Lime Down
Solar Park

The Applicant's Response to Outstanding Matters from Deadline 6 and the Submission Received at Deadline 6B

October 2026

Revision 1

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1 Introduction

1.1 Purpose of Document

1.1.1 This document provides Lime Down Solar Park Limited's (the Applicant's) response to Written Representations (WRs) submitted by Interested Parties at Deadline 6 (21 August 2026) that were not responded to, or were not responded to in full, at Deadline 6B, together with the submission made by Wiltshire Council at Deadline 6B (02 September 2026).

1.1.2 A total of six Relevant Representations (RRs) and 26 WRs were submitted by Interested Parties at Deadline 6 and published on the Planning Inspectorate (PINS) website on 25 August 2026. The Examining Authority (ExA) subsequently exercised its discretion to accept eight further submissions, which were published on 25 August, 9 September, 14 September, 22 September, 25 September and 28 September 2026.

1.1.3 Two of the additional submissions accepted by the ExA, Stop Lime Down's **Business Survey Report [AS-027]** and **Transport Submission [AS-028]**, are addressed separately by the Applicant in the **Applicant's Response to SLD Deadline 6 Submission – Business Survey [EN010168/EXAM/9.86]** and the **Applicant's Response to SLD Deadline 6 Submission – Transport [EN010168/EXAM/9.87]**, respectively, and are therefore not reproduced in this document.

1.1.4 The Applicant has also responded to a further submission from Jonathan Tippet Seymour-Williams, dated 18 September 2026, which was submitted to the Examining Authority and provided directly to the Applicant but had not been published on the Planning Inspectorate's website at the time of this submission.

1.1.5 As set out in the **Applicant's Response to Relevant Representations and Written Representations Received at Deadline 6 [REP6B-014]**, the Applicant responded at Deadline 6B to all matters raised in the six RRs. In respect of the WRs, given the limited period between Deadline 6 and Deadline 6B, the Applicant prioritised its responses to matters raised specifically in relation to the Change Application.

1.1.6 Where a WR raised matters relating to the Change Application alongside other matters concerning the Scheme, the Applicant responded at Deadline 6B to those elements relating to the Change Application. Any additional matters that did not relate to the Change Application were identified for consideration and response at Deadline 7.

1.1.7 This document therefore provides the Applicant's response to those outstanding matters, together with the submission made by Wiltshire

Council at Deadline 6B, and completes the Applicant's response to the relevant submissions received at Deadlines 6 and 6B.

1.2 Structure of Document

1.2.1 This document provides the Applicant's response to the outstanding matters raised in submissions received at Deadline 6, together with the submission made by Wiltshire Council at Deadline 6B, and is structured as follows:

- Table 1-1 sets out the list of acronyms used in this document.
- Error! Reference source not found. lists the local authorities whose submissions received at Deadline 6 and Deadline 6B are responded to in this document. These submissions are presented and responded to in **Section 2** of this document.
- **Table** lists the statutory consultees, undertakers and notable parties whose submissions received at Deadline 6 are responded to in this document and with whom the Applicant is seeking to undertake a Statement of Common Ground. These submissions are presented and responded to in **Section 3** of this document.
- **Table 1-4** lists the host and neighbouring parish councils whose submissions received at Deadline 6 are responded to in this document. These submissions are presented in **Section 4** of this document.
- **Table 1-5** List of Parties Mentioned in the Book of Reference Whose Submissions Are Responded to in Section lists the parties mentioned in the Book of Reference whose submissions received at Deadline 6 are responded to in this document. These submissions are presented and responded to in **Section 5** of this document.
- **Table** lists the members of the public and all remaining organisations and businesses whose submissions received at Deadline 6 are responded to in this document. These submissions are presented and responded to in **Section 6** of this document.

1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Lime Down Solar Park Examination Library.

1.2.3 Revision suffixes have also been attached to any documents which have been revised and resubmitted to the Planning Inspectorate during the Examination.

Table 1-1 List of Acronyms

Acronym	Document
BESS	Battery Energy Storage System
BNG	Biodiversity Net Gain
BSMP	Battery Safety Management Plan
CEMP	Construction Environmental Management Plan
CNL	Cotswolds National Landscape
CR	Consultation Report
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DS	Decommissioning Strategy
EIA	Environmental Impact Assessment
EPMP	Ecological Protection and Mitigation Plan
EPMS	Ecological Protection and Mitigation Strategy
EqIA	Equality Impact Assessment
ES	Environmental Statement
FRADS	Flood Risk Assessment and Drainage Strategy
FTE	Full Time Equivalent
GVA	Gross Value Added
LEMP	Landscape and Ecological Management Plan
OEMP	Operational Environmental Management Plan
PEIR	Preliminary Environmental Information Report
PROWPPMP	Public Rights of Way and Permissive Paths Management Plan
SRMP	Soil Resources Management Plan
SSCEP	Skills, Supply Chain and Employment Plan

Acronym	Document
SWMP	Site Waste Management Plan
WRS	Water Resources Strategy

1.3 Tables of Parties Submitting Comments

1.3.1 The tables below identify the Interested Parties whose submissions, or outstanding matters within those submissions, are responded to in this document.

Table 1-2 List of Local Authorities Whose Submissions Are Responded to in Section 2

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
REP6-066, REP6-067, REP6-068, REP6-069, REP6B-014	WC	01-003, 01-004, 01-005, 01-006, 01-007, 01-008, 01-009, 01-010, 01-011, 01-012, 01-013, 01-014, 01-015, 01-016, 01-017, 01-018, 01-019, 01-020, 01-021, 01-022, 01-023, 01-024, 01-025, 01-026, 01-030, 01-031, 01-032, 01-033, 01-034, 01-035, 01-036, 01-037, 01-038, 01-039, 01-041, 01-042, 01-043, 01-044, 01-045, 01-046, 01-047, 01-051, 01-052, 01-053, 01-057, 02-001, 02-002, 02-003, 02-004, 02-005, 02-006, 02-007, 02-008, 02-009, 02-010, 02-011, 02-012, 02-013, 02-014, 02-015, 02-016, 02-017, 02-018, 02-019, 02-020, 02-021, 02-022, 02-023, 03-001, 03-002,	Wiltshire Council

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
		03-003, 03-004, 03-005, 03-006, 03-007, 03-008, 03-009, 03-010, 03-011, 03-014, 03-015, 03-016, 03-017, 03-018, 03-019, 03-020, 03-021, 03-022, 03-023, 03-024, 03-025, 03-026, 03-027, 03-028, 03-029, 03-030, 03-031, 03-032, 03-033, 03-034, 03-035, 03-036, 03-037, 03-038, 03-039, 03-040, 03-041, 03-042, 03-043, 03-044, 03-048, 03-049, 03-052, 03-053, 03-054, 03-055, 03-056, 03-057, 03-058, 03-059, 03-060, 03-061, 03-062, 03-063, 03-064, 03-065, 03-078, 04-001, 04-002, 04-003, 04-004, 04-005, 04-006, 04-007, 04-008, 04-009, 04-010, 04-011, 04-012, 04-013, 04-014, 04-015, 04-016, 04-020, 04-021, 04-022, 04-023, 04-024, 04-025, 04-027, 04-028, 04-029, 04-030, 04-031, 04-032, 04-036,	

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
		04-037, 04-047, 04-055, 04-056, 04-057, 04-058, 04-059, 04-060, 04-061, 04-065, 04-066, 05-001, 05-002, 05-003, 05-004, 05-005, 05-006, 05-007, 05-008, 05-009, 05-010, 05-011, 05-012, 05-013, 05-014, 05-015, 05-016, 05-017, 05-018, 05-019, 05-020, 05-021, 05-022, 05-023, 05-024, 05-025, 05-026, 05-027, 05-028, 05-029, 05-030, 05-031, 05-032, 05-033, 05-034, 05-035, 05-036, 05-037, 05-038, 05-039, 05-040, 05-041, 05-043, 06-001, 06-002, 06-003, 06-004, 06-005, 06-006, 06-007, 06-008, 06-010, 06-011, 06-012, 06-013, 06-014, 06-015, 06-016, 06-017, 06-018, 06-019, 06-021, 06-024, 06-027, 06-030, 06-032, 06-035, 06-036, 06-037, 06-038, 06-039, 07-001, 07-002, 07-003, 07-004, 07-005,	

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
		07-006, 07-007, 07-008, 07-009, 07-010, 07-017, 07-018, 07-019, 07-020, 07-021, 07-022, 07-023, 07-024, 07-025, 07-026, 07-027, 07-028, 07-032, 07-033, 07-034, 07-035, 07-041, 07-042, 07-043, 07-044, 07-045, 08-001, 08-002, 08-003, 08-004, 08-005, 09-001, 09-002, 09-004, 09-005, 09-006, 09-007, 09-008, 09-009, 09-010, 09-011, 09-012, 09-013, 09-014, 09-017, 09-022, 10-001, 10-002, 10-003, 10-004, 10-005, 10-006, 10-008, 10-009, 10-010, 10-011, 10-012, 10-013, 11-006, 11-007, 11-008, 11-010, 11-011, 11-012, 11-013, 11-014, 11-015, 11-016, 11-017, 11-018, 11-019, 11-020, 11-021, 12-001, 12-002, 12-003, 12-004, 12-005, 12-006, 12-007, 12-008, 12-009, 12-010, 12-015, 12-016, 12-017,	

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
		13-004, 13-005, 13-006, 13-007, 13-008, 13-009, 13-010, 13-011, 13-012, 13-013, 13-014, 13-015, 13-016, 13-019, 13-024, 13-026, 13-027, 13-028, 13-029, 13-030, 13-031, 13-032, 13-033, 13-034, 13-035, 13-036, 13-037, 14-001, 14-002, 14-003, 14-004, 14-005, 14-005a, 14-006, 14-006a, 14-008, 14-009, 14-010, 14-011, 14-013, 14-016, 14-017, 14-019, 14-020, 14-021, 14-022, 14-023, 14-024, 14-025, 14-026, 14-027, 14-028, 14-028a, 14-030, 14-031, 14-032, 14-033, 14-034, 14-037, 14-039, 14-041, 14-048, 14-049, 14-050, 15-001, 15-002, 15-003, 15-004, 15-005, 15-006, 15-007, 15-008, 15-009, 15-010, 15-011, 15-012, 15-013, 15-014, 15-015, 15-016, 15-017, 15-018, 15-019, 15-020, 15-021, 16-001,	

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
		16-002, 16-002a, 16-004, 16-005, 16-007, 16-008, 16-009, 16-011, 16-012, 16-014, 16-014a, 16-014b, 16-014c, 16-015, 16-016, 16-017, 16-018, 16-019, 16-020, 17-001, 17-002, 17-003, 17-004, 17-005, 18-001, 19-001, 19-002, 22-001, 22-002, 23-001, 23-002, 23-003	

Table 1-3 List of Statutory Consultees, Undertakers and Notable Parties Whose Submissions Are Responded to in Section 3

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
REP6-074	EA	N/A	Environment Agency
REP6-078	NH	09-018, 09-019, 09-020, 09-021, 13-003, 13-005, 13-006, 13-008, 13-009, 13-012, 13-013, 13-014, 13-016, 20-001, 20-002, 20-003, 21-001, 21-002, 21-003, 21-004, 21-005, 21-006, 21-007	National Highways
REP6-079	BSWICB	N/A	NHS Bath and North East Somerset, Swindon and Wiltshire

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
			Integrated Care Board
REP6-081, REP6-082, AS-019	SLD	N/A	Stop Lime Down

Table 1-4 List of Host and Neighbouring Parish Councils Whose Submissions Are Responded to in Section 4

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
AS-023	SPC	N/A	Sherston Parish Council

Table 1-5 List of Parties Mentioned in the Book of Reference Whose Submissions Are Responded to in Section 5

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
REP6-087 Additional Submission Not Yet Published	JSW	Party not referenced in Land and Rights Negotiations Tracker.	Jonathan Tippet Seymour-Williams
Additional Submission Not Yet Listed in the Examination Library	JB	05-033, 05-039, 05-042	John Baillie
AS-014	IR	10-004, 10-005, 10-006	Isabel Ross
AS-015	RBF	08-004	Roberts Berry Farm

Examination Library Reference	Acronym	Book of Reference Plot Number(s)	Written Representation Received From
AS-030	SUK	15-013	Solacap UK Ltd

Table 1-6 List of Members of the Public and All Remaining Organisations and Businesses Whose Submissions Are Responded to in Section 6

Examination Library Reference	Acronym	Written Representation Received From
REP6-083	AC	Andrew Calderbank
REP6-084	AP	Andrew Pivars
REP6-085	JF	January Farrington
REP6-086	JO	John Oglesby
REP6-088	PJB	Peter and Jane Boggis
REP6-089	RML	Robert MacLachlan
REP6-090	VJC	Vivienne Jane Clarke
AS-025	GLA	Green Lane Association

2 The Applicant's Response to Host and Neighbouring Local Authorities

2.1 Wiltshire Council

Table 2-1 Wiltshire Council – Comments on any Submissions Received at Deadline 5 [REP6-069]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC1-001	Landscape and Visual	Change 1	**2.7 TPO and Hedgerow Plan (Rev 2)** The Council notes changes to the Index Plan and Sheet 4 to accommodate the small extension of the order limits at 'Lime Down D' to allow the emergency access from the BESS area to be connected with the public highway, in accordance with 'Change 1, as set out in the change application **[CR1 045].** - No additional landscape concerns are identified to result from this change.	The Applicant notes Wiltshire Council's response to 'Change 1' of the Change Application.
WC1-002	Landscape and Visual	Draft DCO	**3.1 Draft Development Consent Order (Rev 5)** **Article 40 – Schedule 12 – Part 3** TPO8 should be included in the schedule due to the impact on the protected trees to the North of Grittleton House and the HHD trenchless solutions and siting of temporary compounds.	The Applicant confirms that N/TPO8 is already included in Part 3 of Schedule 12 to the **Draft DCO [REP6-005].** N/TPO8 is listed as a tree group and individual trees subject to potential felling or lopping or cutting back of canopy or roots, in connection with Work

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Nos. 5A and 8A. Article 41 of the Draft DCO provides the deemed consent mechanism for works to trees listed. Accordingly, the point raised by Wiltshire Council has been addressed in the current version of the Draft DCO. No further amendment is required.
WC1-003	Arboriculture	Tree Preservation Orders	**Article 41 - Trees subject to tree preservation orders** Where, during operation of the authorised development, a retained BS 5837:2012 Category A or Category B tree, or any veteran or ancient tree, is felled or removed for reasons including safety, disease, structural failure or other operational necessity, the undertaker shall notify Wiltshire Council in writing within five working days of the tree being felled or removed. The notification shall include: • the location and reference number of the tree;	The Applicant notes this comment. The Applicant has considered Wiltshire Council's request regarding the extension of the five working day notification period to trees within Conservation Areas. Rather than amending Article 41, the Applicant has introduced an additional operational commitment within the **Outline OEMP [REP6-031]** (Revision 7) at Deadline 6. This requires the Undertaker to provide Wiltshire Council with not less than five working days' written notice where, during operation of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• the reason for the felling or removal; and • the date on which the works were undertaken Wiltshire Council Response: This needs to be reworded to ensure that sufficient notice is provided, as described below. Wiltshire Council requires a distinction between dead and dangerous trees, where we are notified before removal (5 working days' Notice) unless there's an immediate safety risk. Where, during operation of the authorised development, a retained BS 5837:2012 Category A or Category B tree, or any veteran or ancient tree, requires felling or removal due to disease, structural failure, safety concerns or other operational necessity, the undertaker shall notify Wiltshire Council in writing, providing at least five working days prior to the felling or removal of a dead or dangerous tree,	the authorised development, it is determined that the felling or removal of a retained Category A or Category B tree, or a retained veteran or ancient tree, is reasonably necessary due to disease, structural condition, safety considerations or operational requirements associated with the authorised development. The commitment also makes appropriate provision for urgent works where a tree presents an immediate risk of serious harm to persons or property, in which case prior notification would not be required and Wiltshire Council would instead be notified in writing as soon as reasonably practicable following completion of the works. The Applicant considers that this provides an appropriate and proportionate mechanism for ensuring that Wiltshire Council is notified in advance of works to the retained trees

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			protected by a Tree Preservation Order or within a Conservation Area. Please find a link below to the Government website where you can access the above information. https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation areas#dead-trees-and-branches	of greatest arboricultural value and sensitivity during operation, including where such trees are located within a Conservation Area. The Applicant therefore does not consider that a separate amendment to Article 41 to capture all trees subject to Section 211 notification requirements is necessary. The revised commitment is included within the **Outline OEMP [REP6-031]** (Revision 7) submitted at Deadline 6.
WC1-004	Climate Change	ES Climate Change Calculations	**6.1 Environmental Statement Volume 1 Chapter 7 Climate Change (Rev 2)** The Applicant has updated the Climate Change chapter of the Environmental Statement (EN010168) to provide greater clarity on a number of matters. These revisions include further explanation of the number of fixed and tracked solar photovoltaic (PV) panels and their associated impacts, incorporation of Environmental Product	The Applicant notes this comment. In summary, the Applicant compared the lifecycle greenhouse gas intensity of the Scheme with the projected UK grid carbon intensity in the first year of operation (2029) to provide context regarding the carbon performance of the Scheme at the point electricity generation commences.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Declaration (EPD) data, and clarification of the methodology used to compare the Scheme's emissions against the carbon intensity of grid electricity. The revised calculations have resulted in an increase in the estimated embodied carbon emissions of the Scheme and, consequently, an increase in the total calculated carbon emissions and carbon intensity of the development. The updated assessment has also resulted in an increase in the forecast electricity generation from the Scheme. The revisions provide a more comprehensive explanation of the Scheme's overall climate change benefits, whereby co-benefits include the contribution of the Battery Energy Storage System (BESS) to grid balancing and resilience, as well as the Scheme's role in supporting the decarbonisation of the national electricity supply. This, in turn, facilitates wider decarbonisation across other sectors, including housing and transport.	The Applicant recognises that UK grid carbon intensity is projected to decrease over time as additional low-carbon generation is deployed. However, the assessment considers the lifecycle greenhouse gas emissions associated with the Scheme and the contribution it makes to meeting national decarbonisation and renewable energy objectives. Nevertheless, the predicted grid average intensity for the first year of operation is an appropriate baseline against which to estimate future carbon savings. As stated, the comparison of the Scheme's carbon intensity with the UK grid projection is not "*like-for-like*". For example, the UK Grid GHG Intensity values (as per DESNZ 2023) are based on territorial and operational emissions, while the Scheme's inventory accounts for global and lifetime emissions (and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Wiltshire Council welcomes the additional work undertaken by the Applicant to improve transparency regarding the assessment of carbon emissions, including clarification of assumptions and methodologies applied. A number of the revisions respond to concerns identified within the University of Exeter report (submitted as part of Wiltshire Council's Written Statement), although not all matters raised have been addressed. The Council notes that the report's observations and conclusions may still remain relevant in respect of certain 5 methodological choices, including the comparison of Scheme emissions against the carbon intensity of the electricity grid in the first year of operation, rather than against the projected grid intensity for each year across the operational lifetime of the development.	therefore presents a precautionary assessment). The Scheme would nonetheless represent an emissions saving and would support the trajectory to net zero, as the grid average during the Proposed Development's operation will include fossil fuel energy generation.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC1-005	Climate Change	ES Climate Change Calculations	Nevertheless, the Council accepts that the amendments provide greater transparency and assist in understanding the basis of the assessment. Whilst the council cannot comment on the precise figures and methodology, the Council maintains its previous position that the Scheme would deliver an overall benefit in terms of carbon emissions reduction and considers that the revised assessment more clearly contextualises and demonstrates those benefits.	The Applicant notes this comment.
WC1-006	Landscape and Visual	Viewpoints	**6.2 Environmental Statement Volume 2 Figure 8-10 Viewpoints (Rev 2)**. The Council notes the addition of viewpoint locations for the ExA's additionally requested Viewpoints referenced as 'VP ExA 1' (Lime Down D) and 'VP ExA 2' (Lime Down D) included on the maps **[REP5-043]**.	The Applicant notes this comment.
WC1-007	Transport and Access	AIL Route	**[REP5-039] 6.2 ES Vol 2. Figure 3-4-1 to 3-4-2 Landscape and Ecology Mitigation Plan (rev 3) (1 of 4);**	The Applicant is not proposing to remove the access north of Bincombe Wood from **ES Volume 2, Figure 3-4-1**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			[REP5-040] 6.2 ES Vol 2. Figure 3-4-3.1 to 3-4-3.2 Landscape and Ecology Mitigation Plan (rev 3) (2 of 4); **[REP5-041] 6.2 ES Vol 2. Figure 3-4-4.1 to 3-4-4.2 Landscape and Ecology Mitigation Plan (rev 4) (3 of 4);** **[REP5-042] 6.2 ES Vol 2. Figure 3-4-5.1 to 3-4-5.2 Landscape and Ecology Mitigation Plan (rev 4) (4 of 4).** The Council has assumed that the plans have been amended to primarily reflect DCO boundary limit changes arising from the applicants Change Request 1 application which has been accepted into Examination. The Council notes the alternative AIL road route through field parcels E2, E3 to reach the planned 132kV substation in field parcel E5 (Lime Down E) with the aim of avoiding impacts to Bincombe Wood (Ancient Woodland) from the original planned route. However, the Council observes that the original AIL route running along the northern edge of Bincombe Wood still remains on the Lime Down E	**to 3-4-5.2 Landscape and Ecology Mitigation Plan [REP6-009 and REP5-040 to REP5-042]** as this is to be retained for operational and maintenance purposes, such as hedgerow management, and would also continue to provide access for existing agricultural operation. However, the plans have been updated at Deadline 6 to differentiate accesses forming standard construction routes, AIL construction routes and/or both in different colours.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Figures [REP5 042] in addition to the revised AIL track route around the northern and eastern edges of field parcel E3.	
WC1-008	Transport and Access	Landscape and Ecological Mitigation Plans	The Council considers that the 'Landscape and Ecological Mitigation Plans' **[REP5-039; 040; 041; 042]** should be revised to differentiate between the different internal access track / road functions, with different keyed line-type colours, as they are all currently the same light brown colour, so specific routes and the differences within illustrative construction details **[REP5-066]** are not clear on the plans. The Council suggests the following three types of internal access tracks could and should be separately keyed and illustrated on plans; • 'Internal tracks to provide AIL access to the proposed 132kV substations' (surfaced with granular porous materials). (As illustrated within **[REP5-066]** ES, Vol 3, APP/6.3, Appendix 3-3, illustrative drawings). • 'Internal tracks/roads to	The Landscape and Ecological Mitigation Plans will be revised at Deadline 7 to differentiate between the different internal access track / road functions, with different keyed line-type colours as specified by Wiltshire Council.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			provide AIL access to the proposed 400kV substation and BESS area' (surfaced with non porous macadam materials) incorporating roadside ditch/es (As illustrated within **[REP5-066]** ES, Vol 3, APP/6.3, Appendix 3-3, illustrative drawings. • 'Internal access tracks within solar panel fields' (surfaced with granular porous materials) which should be incorporated into **[REP5-066]** as an additional illustrative drawing*; *The Council suggests that if the illustrative construction details for 'Internal access tracks within the Solar Panel fields' is unlikely to differ from the illustrative construction details for the 'AIL Internal Access Road Cross-Sections for 132kV Substations', then the drawing could simply be re-titled 'Internal tracks to provide AIL access to the proposed 132kV substations & Solar Panel fields,' then only two types of access track would require to be included on the plans.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC1-009	Landscape and Visual	Assessment Methodology	**6.3 Environmental Statement Volume 3 Appendix 8-1 Landscape and Visual Assessment Methodology (Rev 3)** The Council notes the inclusion of the ExA's additionally requested Viewpoints 1 and 2 (as summer views) at the end of Section 5, Photography and Photomontage Methodology **[REP5-068]**.	The Applicant notes this comment.
WC1-010	Landscape and Visual	Cotswold National Landscape	**6.3 Environmental Statement Volume 3 Assessments of Effects on the CNL and its Special Qualities (Rev 2)** The Council understands the revision is to consolidate the submission into the ES Volume 3 (as appendix 8-6), following its initial submission as part of the applicant's Change Request 1, at the request of the ExA.	The Applicant confirms that **Appendix 8-6 [REP5-069]** (Revision 2) was revised to reflect the changes in Change 4 the Change Application.
WC1-011	Ecology and Biodiversity	Ecological Mitigation Plan	The Council is unable to locate specific locations to understand the extent to which the applicant is proposing to restore dry-stone walls within the setting of the CNL on the submitted Landscape and Ecological Mitigation Plan for Lime	The Applicant confirms that dry stone wall restoration is proposed along the eastern edge of field parcels A1 and A2 and the Landscape and Ecological Mitigation Plan for Lime Down A will be revised to more clearly define this.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Down A **[REP5-039]** despite it being referenced on the key. The Council understands drystone walls are present along the eastern edge of field parcels A1 and A2, but they are not currently discernible. The Council believes the thin dashed brown line, is currently obscured by the thicker red line, denoting the order limit boundary. The Council to clearly identify where existing drystone considers walls are it important proposed to be restored on the 'Landscape and Ecology Mitigation Plan/s' and **[REP5-039]** revised to address this. The Council additionally notes reference within the drawing key to 'existing drystone wall to be retained' within the 'Landscape and Ecological Mitigation Plan' for Lime Down A **[REP5-039]**. The Council suggests that the current wording on this drawing key should be changed to 'existing drystone wall to be retained and restored', alongside clearer	The Applicant will revise the key on Landscape and Ecological Mitigation Plan for Lime Down from '*existing drystone wall to be retained*' to '*existing drystone wall to be retained and restored'.*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			visual identification on the plan to where these walls are located would provide greater planning certainty that the restoration of drystone walls will be delivered by the project and a clear link to Requirement 7 (Landscape and Ecological Management Plan) is secured.	
WC1-012	Construction and Decommissioning	Construction Environmental Management Plan	**7.12 Outline Construction Environmental Management Plan (Rev 6)** Impacts to Ancient Woodland (North Bincombe Wood) from access tracks: Access tracks will be aligned to maintain a minimum 15 m buffer from the boundary of North Bincombe Wood Ancient Woodland, whilst also maintaining a minimum 50 m buffer from the Great Crested Newt (GCN) pond identified between Fields E1 and E2 (as identified in ES Volume 2, Figure 2-2: Figure 2 2-1 to 2-2-5 Field Boundaries and Numbering [APP-078]).	The Applicant confirms further discussions were undertaken relating to Bincombe Woods on a call with Wiltshire Council on 21 September. This was a productive conversation whereby wording was shared by the Council the following day and adopted by the Applicant in the updated version of the **Outline CEMP [EN010168/APP/7.12]** (Revision 8) prepared for Deadline 7.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Adjacent to North Bincombe Wood, any upgrades to the existing track will follow a specialist 'no-dig' construction methodology and specification to avoid the need to excavate and potentially incur root damage. If required, the access track will be built on top of the existing ground level, with no digging into the ground for a sub-base. No heavy vehicles or machinery will be used along the track where it is adjacent to North Bincombe Wood. No monitoring required Wiltshire Council Response – Discussions are still ongoing between parties and will be considered at DL6.	
WC1-013	Construction and Decommissioning	Construction Environmental Management Plan	**REP4-049 – Outline construction environmental Management Plan – Page 100 – para 3.1.113:** Wiltshire Council Archaeology Service (WCAS) are content with the mitigation work proposed by the applicant's archaeological consultant. Public engagement during the mitigation work	The Applicant notes WCAS are content with the mitigation works proposed in the **Outline Construction Environmental Management Plan [REP6-029]** and detailed in **Environmental Statement Volume 3 Appendix 12-6 Outline Archaeological Mitigation Strategy [REP6-012]**. Section 12 of **Environmental**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			has been stipulated as a requirement of archaeological works by WCAS.	**Statement Volume 3 Appendix 12-6 Outline Archaeological Mitigation Strategy [REP6-012]** sets out the scope of public outreach and engagement.
WC1-014	Construction and Decommissioning	Construction Environmental Management Plan	**7.13 Outline Operational Environmental Management Plan (Rev 6)** Where, during operation of the authorised development, a retained BS 5837:2012 Category A or Category B tree, or any veteran or ancient tree, is felled or removed for reasons including safety, disease, structural failure or other operational necessity, the undertaker shall notify Wiltshire Council in writing within five working days of the tree being felled or removed. The notification shall include: • the location and reference number of the tree; • the reason for the felling or removal; and • the date on which the works were undertaken	Please see response to WC1-003.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Wiltshire Council Response: This needs to be reworded to ensure that sufficient notice is provided, as described below. Wiltshire Council requires a distinction between dead and dangerous trees, where we are notified before removal (5 working days' Notice) unless there's an immediate safety risk. Where, during operation of the authorised development, a retained BS 5837:2012 Category A or Category B tree, or any veteran or ancient tree, requires felling or removal due to disease, structural failure, safety concerns or other operational necessity, the undertaker shall notify Wiltshire Council in writing, providing at least five working days prior to the felling or removal of a dead or dangerous tree, protected by a Tree Preservation Order or within a Conservation Area. Where works are urgently necessary because the tree presents an immediate risk of serious harm, notification shall be provided as soon as practicable	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			following the completion of the works, and shall include: • the location and reference number of the tree; • the reason for the felling or removal; • the date on which the works were undertaken; and • where applicable, a brief arboricultural justification explaining why the works were considered urgently necessary. Please find a link below to the Government website where you can access the above information. https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in conservation-areas#dead-trees-and-branches	
WC1-015	Soils and Agriculture	Soil Resources Management Plan	**14. 7.15 Outline Soil Resources Management Plan (Rev 4)** 14.1. The Council provided comments at Deadline 4 in relation to the OSRMP (Rev 3) **[REP4-054]** within to ExQ2-DCO 2.1.2, ExA's Second Written its response Questions **[PD 015]** including	The Applicant directs the Council to the response to DCO2.1 of **The Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			comments on additional principles for locating soil stockpiles (para. 1.8.22) and the introduction of maximum stockpile parameters (para. 10 1.8.24). Significant concerns remain regarding the scale of soil storage required/proposed, the absence of identified stockpile locations, which in the Councils view risks subsequent conflict with areas of embedded mitigation, stated Design Principles and Parameters and best practice referenced from within various outline Management Plans.	
WC1-016	Soils and Agriculture	Soil Resources Management Plan	The Council remains concerned that no indicative stockpile locations have been identified on any supporting plans. While the revised oSRMP (Rev 4) **[REP5-078]**, para. 1.8.23, references good practice measures such as 'avoiding impacts on trees, watercourses and areas of construction activities', it does not adequately address other key environmental constraints, including overland surface water flow routes,	Paragraph 1.8.23 was expanded in Revision 5 of the **Outline SRMP [REP6-035]** submitted at Deadline 6 to identify additional spatial constraints to stockpile locations as advised by other relevant disciplines: Cultural Heritage, Ecology and Biodiversity and Landscape and Visual as per the council's request.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			embedded mitigation areas, ecological and environmental buffers, or require consideration of landscape character or visual amenity interests.	Additional measures in relation to hydrology, flood risk and drainage have been added to Paragraph 1.8.23 of the **Outline SRMP [EN010168/APP/7.15]** (Revision 6) at Deadline 7 to specify where stockpiles can be stored in relation to Flood Zones. Moreover, an amendment to paragraph 1.8.40 was also made at Deadline 7 which further considers surface water flows and flooding in terms of management plans and additional mitigation as a means of monitoring soil condition.
WC1-017	Soils and Agriculture	Soil Resources Management Plan	Given the potential extent of soil stockpiles required, the Council considers that indicative stockpile locations should be included on the Works Plans, or alternatively that clear spatial constraints and exclusions should be incorporated within mitigation strategies, or that a requirement for a '**detailed Soil Stockpile Constraints Plan**' be prepared to clearly illustrate the	Refer to response to WC1-016. Detailed constraints plans, including the detailed SRMP, will be developed at the detailed design stage.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			land areas which would not be suitable for soil stockpiling, such as on steeper sloping land, flood zones, overland surface water paths, embedded mitigation areas and environmental buffers etc. in order to address all relevant environmental constraints, design principles and best practice referenced to be followed from within Management Plans.	
WC1-018	Soils and Agriculture	Soil Resources Management Plan	At the very least the Council would wish to see para. 1.8.23 **[REP5 078]** expanded to list all relevant environmental constraints, and mitigation areas, not just 'root- or crown-spread of trees, adjacent to watercourses or in locations where they will be disturbed or contaminated by other construction activities.'	Refer to response to WC1-016.
WC1-019	Ecology and Biodiversity	Hedgerow Removal Plans	**15. 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 5)** **TPO and Hedgerow Removal Plans** There is distinct lack of information between several of the plans, for	The Applicant notes Wiltshire Council's comment. Following a due diligence review by the Applicant, the Hedgerow Removal Plan presented in Annex A of the **Outline and Ecological Protection and Mitigation Strategy**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			example, between sheet 25, sheet 26, and sheet 27, there is a large element of hedgerow and protected trees that are affected by the cable route corridor where no plan has been provided.	**[EN010168/APP/7.19]** (Revision 7) has been updated at Deadline 7 to capture additional minor hedgerow removal expected to be required to widen existing field entrances at sheet 26, with associated updates to the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** (Revision 6) and **ES Volume 1, Chapter 9 Ecology and Biodiversity [EN010168/APP/6.1]** (Revision 4) to reflect this change. This was identified as being required following a further review of Access Drawings presented in Annex C and Annex D of **ES Volume 3, Appendix 13-1 Transport Assessment [EN010168/APP/6.3]** (Revision 7) to ensure consistency across these documents. The Applicant confirms that all proposed hedgerow breaches within the Cable

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Route Corridor are shown on the Hedgerow Removal Plan. Where gaps occur between the identified breaches, this reflects locations where hedgerow removal is not anticipated to be required, for example due to the absence of hedgerows, the presence of existing gaps that will be utilised for access, or the presence of Avoidance Areas where cable installation will adopt trenchless technologies to avoid hedgerow removal. The Applicant has also amended the **TPO and Hedgerow Plan [EN010168/APP/2.7]** (Revision 3) for Deadline 7 to ensure it aligns with the extent of hedgerows presented in the Hedgerow Removal Plan.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC1-020	Construction and Decommissioning	Outline CEMP	**16. 7.22 Outline Construction Traffic Management Plan (Rev 5)** The Applicant considers that appropriate mitigation and monitoring are already secured through the Arboricultural Method Statement and the Outline CEMP [REP4-049], which together provide suitable protection for **Surrendell Wood** during construction. Notwithstanding this position, discussions with Wiltshire Council are continuing to determine whether any additional commitments can be agreed. Subject to the outcome of those discussions, the Applicant will provide any agreed amendments to the relevant management plans at Deadline 6. Until that time, this matter remains under discussion between the parties. Wiltshire Council Response – Discussions are still ongoing between parties and will be considered at DL6.	The Applicant notes this comment and welcomes further discussion with Wiltshire Council.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC1-021	Transport and Access	Rodbourne Conservation Area	*Applicant note: Images were provided citing a previous applicant response.* **Comment:** Confirmation regarding the scope of the Highway improvement Works at this location is welcomed and removes the concerns raised in respect of potential impact on the Rodbourne Conservation Area from works to the access.	The Applicant notes this comment and welcomes confirmation that the Council's concerns have been addressed in this regard.
WC1-022	Landscape and Visual	LVIA	**9.55 Applicant's response to submissions received at D4** 17.1. The Applicant has included a response to Wiltshire Council's Post Hearing Submissions **[REP4-092]** within Table 2-9 **[REP5-098]**. The table includes 44 individual Reference points covering (ISH 2) for Landscape and Visual Matters (WC-004 to WC-047 inclusive). The Council comments on these themed reference points where relevant as follows; Landscape Fabric 12 WC-004 – The uncertainty around the definition of 'Landscape Fabric' used and applied	With reference to comments on '*Landscape Fabric*', the Applicant notes that GLVIA3 does not provide a definition of the term in its Glossary. However, the term is used in its text. It should be noted that GLVIA3 is not a prescriptive methodology for undertaking Landscape and Visual Impact Assessment (LVIA) but rather provides a framework of principles and good practice within which professional judgement is applied.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			within the applicant's LVIA's, 'Landscape identified as an Assessment' was issue from the project's outset, initially raised within the Council's PEIR stage review comments. This matter has been continually raised as an issue and questioned by the Council prior to and throughout the examination process within its various formal responses. As previously highlighted by the Council, there is no definition of 'Landscape Fabric' contained within the GLVIA3 Glossary definitions. The Council has set out in detail with references to specific paragraphs in this guidance, where the applicant, in the Council's view, has not interpreted or applied this guidance correctly within their LVIA, landscape assessment, which in the Council considers ultimately culminates in the omission and/or under reporting of adverse change effects for some landscape elements, while over stating the beneficial effects for others.	The Landscape Institute's Technical Guidance Note LITGN-2024-01 Published August 2024, Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) sets out that the purpose of LVIA is to communicate the landscape professional's judgement about changes to landscape and views, and that achieving that outcome is more fundamental to good LVIA than the detailed mechanics of a particular methodology. It also expressly says on Page 1 that "*variation and debate are to be expected rather than discouraged*." And that whilst "*GLVIA3 provides a structured process for assessing effects on landscape and visual resources. The responsibility of the assessor is to tailor it to the place and project under consideration, supported by an explanation of the rationale behind the approach taken*."

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				As explained in the **Technical Note on Landscape Fabric and Landscape Character [REP1-121]**, the assessment on Landscape Fabric is an independent and separate assessment to that undertaken on the effects of the Scheme on Landscape Character. The Technical Note explains that the Methodology used in the LVIA has been developed in response to the increasing number of large-scale solar farms where there is potential for large scale landscape change resulting in both Adverse and Beneficial effects. By treating Landscape Fabric as a separate Landscape Receptor, the approach allows the physical landscape benefits of the Scheme (such as new hedgerows and meadows) at the Site level to be quantified without affecting the separate assessment on Landscape Character.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC1-023	Landscape and Visual	LVIA	GLVIA3 contains a Glossary of definitions commonly used for 'Landscape and Visual Impact Assessment', pages 155-159. There is no definition of 'Landscape Fabric' within GLVIA3. GLVIA3 Glossary definition (page 156) defines 'Elements' as… ''Individual parts which make up the landscape, such as, for example, trees, hedges and buildings.' GLVIA3 Glossary definition (page 157) defines 'Landscape' as… ''An area, as perceived by people, the character of which, is the result of the action and interaction of natural and/or human factors.'' GLVIA3 Glossary definition (page 157) defines 'Landscape Character' as… ''A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.'' The Council considers that the applicant should be asked a simple question in relation to their assessment of	Please refer to the response above as well as further comment below: Landscape Fabric is described in the **LVIA Assessment Methodology [REP5-067]** Glossary and at paragraph 8.7.16 of the **LVIA [REP6B-004]** as: "*Landscape fabric is the individual tangible elements or features such as landform, woodland, hedges, tree cover, vegetation that make up a landscape or site. These can usually be described and quantified.*". These are the natural elements within the Site, for example the lengths of hedgerow or areas of woodland and grassland within each individual site. Landscape Character is described in the **LVIA Assessment Methodology [REP5-067]** Glossary as follows: "*A distinct, recognisable, and consistent pattern of elements in the landscape*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			landscape fabric, as follows… 'Is the term 'Landscape Fabric' as applied within the applicants LVIA interchangeable with the term 'landscape Element' as defined in the GLVIA3 Glossary (page 156)? If the answer is YES, then the Council views the LVIA's separate assessment and conclusions on 'landscape fabric' represents a partial and incomplete assessment of landscape elements (fabric) as it only includes some natural elements which does a full or transparent narrative or assessment of the physical direct change effects for all not give relevant landscape elements, including man-made and perceptual aspects which may influence character. The LVIA should include within its separate assessment of fabric components, all elements, both natural and manmade, existing and introduced into landscape within the DCO order limits / study the areas, to help the ExA understand the direct tangible landscape	*that makes one landscape different from another, rather than better or worse*." The Applicant's definition of '*Landscape Fabric*' is defined in the **LVIA Assessment Methodology [REP5-067]**, as noted above and is not interchangeable with GLVIA's definition of '*element*'. As previously stated, the **LVIA [REP6B-004]** provides two separate assessments: one on Landscape Fabric and one on Landscape Character. The Landscape Character Assessments undertaken within the 1km, 2km and 5km considers all elements of the receiving landscape and the proposed Scheme including natural and man-made elements (such as the solar infrastructure) as well as the landscape's cultural, aesthetic and perceptual qualities.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			effects attributable to the proposed development during construction, operation and decommissioning stages. 13 If the answer is NO, then the Council questions why the LVIA hasn't carried out a credible separate assessment of resulting tangible change effects for landscape elements. The LVIA robustly assess Council does or seeks to not consider that quantify these changes within separate narrative and assessment of landscape character.	
WC1-024	Landscape and Visual	LVIA	WC-005 - The Applicant's comments help further illustrate the Council's point about conflating separate elements (Fabric components) with assessments the separate of landscape assessment of landscape character i.e. the comment is themed under landscape fabric assessment, but the applicant's response references the intention to carry out further assessment of landscape character. To be clear, the Council has consistently sought a transparent assessment with a clear and	The Applicant notes Wiltshire Council's view that a further assessment of landscape character is not a helpful substitute to help the ExA understand the direct and indirect landscape change effects for landscape elements impacted within the DCO order limits and study area.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			well considered narrative of the direct tangible physical changes to all landscape elements within the DCO sites or otherwise impacted by the development proposal, whether that be from direct losses, new additions, or other changes such as through changed management prescriptions. This assessment should incorporate both natural and manmade elements, including any relevant perceptual change aspects which could influence character, these tangible changes should be measured and quantified from existing baseline conditions where possible. The Council considers that a further assessment of landscape character is not a helpful substitute to help the ExA understand the direct and indirect landscape change effects for landscape elements impacted within the DCO order limits and study area.	
WC1-025	Landscape and Visual	LVIA	WC-006 to WC-010 - The Council maintains its opinions in relation to	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Landscape Fabric and has no further comment to make.	
WC1-026	Landscape and Visual	Cotswolds National Landscape	**The Cotswolds National Landscape** WC-011 to WC-017 - The Council's position is clear on the points raised in relation to the setting of the CNL; effects on the Special Qualities of the CNL and Furthering the CNL purposes. The Council has no further comments to make at this stage.	The Applicant notes this comment.
WC1-027	Transport and Access	Construction Traffic Management Plan	**Design and Parameters** **WC-027** to- No further comment. **WC-028** - No further comment. **WC-029** - No further comment. **WC-030 to WC-031** - The council notes the applicant's response in relation to the outstanding previously requested additions/changes to Work No. 6 and Work No. 8a & 8b **[REP4-043]** Design Principles and Parameters, within the updates now incorporated into Construction Traffic Management Plan **[REP4-057]** below;	The purpose of the **Design Principles and Parameters [REP4-043]** document is to set out the design principles and parameters by which the Scheme has been designed and the Environmental Impact Assessment has been undertaken. It contains the Scheme parameters and design commitments related to those parameters.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the Outline '' Section 6.4 of the Outline Construction Traffic Management Plan [REP4 057] was updated at Deadline 4 to state, "Any edge restraints required to form or retain surface materials at access points to the Solar PV Sites, the BESS and Substation will be laid to finish flush with adjacent road levels to avoid creation of uncharacteristic upstands". In addition, Section 6.4 of the Outline Construction Traffic Management Plan [REP4-057] was also updated at Deadline 4 to state, "Where existing sections of roadside hedgerows or dry stone walls are necessary to remove to facilitate the temporary creation of highway visibility splays and widened access to accommodate AIL's, the removed sections of hedgerow or drystone wall shall be replanted or reconstructed on existing alignments following completion of any temporary works, and on new adjusted alignments along the back edge of the required	Wiltshire Council's request to include reference to "*wooden posts round in section and agricultural in appearance*" could be accommodated in the **Design Principles and Parameters [REP4-043]** as there are already parameters and design commitments related to fencing in that document. However, in terms of including these highways related design commitments, the Applicant considers that the **Outline CTMP [REP6-041]** is the appropriate document given Section 6.3 of the **Outline CTMP [REP6-041]** already sets out specific highways measures. These highways measures are secured under Requirement 15 of the **Draft DCO [REP6-005]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			visibility splays for any permanent works. The Council is unclear, as to why some of the councils' previous requests have been incorporated into the **Design Principles and Parameters** document **[REP4-043]**, while others are incorporated into the **Outline Construction Traffic Management Plan [REP4 057]** as there is no explanation within the applicant's response explaining the different approaches taken.	
WC1-028	Soils and Agriculture	Outline Soil Resources Management Plan	**WC32 to WC-033** - No further comment. **WC-034** - Please refer to comments provided under **[REP5-078]** 7.15 Outline Soil Resources Management Plan (Rev 4) Tracked response above.	Refer to response to WC1-016.
WC1-029	Arboriculture	Tree Removal	**WC-03**5 - The Council acknowledges the applicant's commitment to ensure that there is no woodland edge tree loss or drystone wall removal at Grittleton Crossroads.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC1-030	Landscape and Visual	Visual Impact Mitigation	**WC-036** - The Council confirms its concerns regarding the colouration of infrastructure components in the landscape and is not reassured that these will be of a muted, non-reflective finish, which is compatible with the need to ensure that the visual impact of these components is minimised. Additionally, the Council has concerns that the bunding and acoustic fencing around the BESS will in itself be unacceptably prominent. It will require suitable screen planting at an early stage to rapidly reduce the potential visual impact. **WC-037** - No further comment.	The Applicant notes this comment regarding the colouration of infrastructure. Regarding the bunding and acoustic fencing around the BESS, which is located adjacent to the railway line and existing woodland, screen planting is proposed on the bunding to reduce its visual impact as shown on the Landscape and Ecological Mitigation Plans [REP5-039 - REP5-042].
WC1-031	Construction and Decommissioning	ISH2 Action Points	**ISH2 - Action Points** **WC-038** – Wiltshire Council provided a deferred response to (ISH2)- Action Point 2, within its **Wiltshire Council Comments on Submissions Received at Deadline 4 [REP5-113]**, at Deadline 5 **[REP5-113]** Section 31, Para's 31.1 to 31.7 (pages 52-52).	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			WC-039 – (ISH2) Action Point 6. Refers to Outline Decommissioning Strategy Rev3 [REP3-097] and DCO (Rev3 [REP3 006]. See below for responses. **WC-040** – (ISH2) Action Point 6. The Council confirms its requirements at Paragraphs 3.3 to 3.5 and notes the applicant's comments. **WC-041** – (ISH2) Action Point 6. The Council confirms its requirements at Paragraphs 3.6 to 3.9 relating to signing off the decommissioning works (Section 6.3 Management Review). The Applicant's response has not adequately addressed this issue.	
WC1-032	Construction and Decommissioning	ISH2 Action Points	**WC-042** - (ISH2) Action Point 6. The Council confirms its request with Requirement 20 for a decommissioning report and certificate of completion for its approval	The Applicant refers Wiltshire Council to its response given to DCO2.19 in the **Applicant's Response to the Examining Authority's Second Written Questions [REP5-097].**
WC1-033	Construction and	ISH2 Action Points	**WC-043** - (ISH2) Action Point 7. The Council does not consider that applicant's response answers its	The Applicant acknowledges that existing field hedgerows may be associated with parallel drainage ditches

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Decommissioning		concern in relation to existing field ditches and potential conflict with any parallel hedgerow widening proposals, such as adjacent to existing, largely single species Elm hedgerows.	and that appropriate access may need to be retained to allow for their ongoing inspection and maintenance. Where an existing single or dominant species hedgerow is identified for reinforcement to provide or enhance visual screening, the precise location and arrangement of supplementary planting will be determined through the detailed Landscape and Ecological Management Plan (LEMP), having regard to local site conditions, including the presence of existing drainage ditches and the need to maintain appropriate access to them. Where a ditch is present immediately adjacent to an existing hedgerow, supplementary planting would therefore not necessarily be planted directly alongside the existing hedge. Depending on the local circumstances,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				planting may be appropriately offset from the ditch or located on the opposite side of it, with sufficient space retained for maintenance access. Alternatively, where appropriate and practicable, reinforcement of the existing hedgerow through infill planting and management may be used to strengthen its screening function. This approach would ensure that the intended landscape and visual mitigation can be delivered without compromising the function or future maintenance of existing drainage features.
WC1-034	Construction and Decommissioning	ISH2 Action Points	**WC-044** - (ISH2) Action Point 11. The Council maintains its opinion in relation to this point (reference to best practice standards) and considers that the information requested should be referenced and incorporated, in	The Applicant maintains its position as set out in its response at WC-044 in the **Applicant's Response to Submissions Received at Deadline 4 [REP5-098]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			particular for the project's operational phase.	
WC1-035	Construction and Decommissioning	ISH2 Action Points	**WC-045** - (ISH2) Action Point 13. The Council has provided further comment in relation to how it considers the s.85 Duty of the CRoW act should be applied to further the statutory purpose and function of the CNL designation within it's Post hearing submissions [REP4 092] (ISH2) Section 2, para's 2.27 – 2.32. The Council has nothing further to add.	The Applicant notes this comment.
WC1-036	Construction and Decommissioning	ISH2 Action Points	**WC-046** - (ISH2) Action Point 16. No additional comment. Plans WHL WCC002-02 and WHL-WCC002-03 submitted July 2026 [REP4 092] Appendix C. **WC-047** - (ISH2) Action Point 19. No additional comment. Plan WHL-WCC002 04 submitted July 2026 **[REP4-092]** Appendix D.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC1-037	Landscape and Visual	Imagery of Legacy Landscape	**9.57 Imagery of Legacy Landscape** 18.1. The Council notes the inclusion of additional photomontages to illustrate how the legacy landscape may look after 60 years ears, from seven representative viewpoint locations (VP3, VP4, VP6, VP25, VP26, VP30 and VP31). While the Council welcomes and supports the applicant's intention to leave a positive, enhancing landscape legacy following decommissioning, there is of course no guarantee that the legacy landscape presented within these photomontages will look like this at the end of 60 years. The Legacy landscape will depend on effective establishment of planting and ongoing management for the life of the project, including effective monitoring and adaptive management measures, and noting retention of some beneficial landscape enhancement components would be at the final discretion of individual landowners in combination with environmental	It is agreed that the Legacy landscape will depend on effective establishment of planting and ongoing management for the life of the project, including effective monitoring and adaptive management measures. These measures are set out in the **Outline Landscape and Ecological Management Plan (LEMP) [REP6-037]**, which secures the provision of replacement tree and woodland planting as part of the wider landscape, ecological and biodiversity mitigation strategy, and the **Outline Environmental Protection and Management Strategy (EPMS) [REP6-039]**, which establishes the framework for the delivery of environmental mitigation throughout the construction and operational phases.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			protections in force at the time of decommissioning.	The detailed design of replacement planting, including species selection, planting specifications, locations and long-term management, will be developed following consent as part of the detailed Landscape and Ecological Management Plan (LEMP) and Environmental Protection and Management Strategy (EPMS). These documents are required to be submitted to and approved by the relevant planning authority pursuant to Schedule 2, Requirements 7 and 8 of the **Draft DCO [REP6-005]** before the relevant works can commence.
WC1-038	Landscape and Visual	Limestone Lowlands Character Area	**Action Point 14** states: Provide an assessment of how the Limestone Lowland landscape type and its sub-divided Landscape Character Areas would be affected including reference to the: - key characteristics; - Inherent landscape sensitivities; and - broad management objectives. **Action Point 15** states: Provide an assessment of how the key characteristics of the	The Applicant notes this comment. At Paragraph 1.1.6 of the **Limestone Lowland Character Assessment [REP6B-008]**, the Applicant explains that all Landscape Types and Character Areas with the 10km Study Area were

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			relevant landscape character types (Limestone Lowland and Hullavington Rolling Lowland) would be impacted by cumulative developments. Explain whether the key characteristics of the character types would be so changed by the cumulative developments as to transform it into a different landscape type. Wiltshire Council considers that Action Points 14 and 15 are clear in their requirements and that there is no logical reason for the Applicant to change the action requirements and effectively over-complicate what are relatively straightforward actions.	assessed holistically to be comparable with the **LVIA [REP6B-004]**.
WC1-039	Landscape and Visual	Limestone Lowlands Character Area	**Mitigation** 1.2.3 As discussed throughout the examination procedure Wiltshire Council does not have confidence that the applicant has followed the principles for mitigation set out in the relevant	The Applicant respectfully disagrees that the management guidelines for LCA8 are akin to mitigation principles. With reference to the other management guidelines, the Lime Down Scheme incorporates extensive measures to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Landscape Character Assessment Guidance. For example, Hullavington Rolling Lowland LCA8 Management Guidelines at 4.145 states: The overall objectives for the area are to conserve and enhance its pastoral character, and to ensure that any new development respects the grain of the dispersed settlement in the area and the vernacular building materials. This does not indicate that the wholesale industrialisation of the receiving landscape is by any means going to be acceptable. 1.2.6 The issue of whether the proposed mitigation will be suitable following decommissioning has been previously discussed at length with some of the mitigation proposals e.g. growing hedges to 4.5m being inherently unsuitable for the receiving landscape. The commentary at 1.2.6 is once again confusing mitigation and enhancement.	improve the continuity of hedgerows (which is specifically noted as important in shaping the character of the area) and provides new habitat creation and planting of riverside trees along river valleys and water courses. Notwithstanding the change in land use as a result of the introduction of solar infrastructure, the Applicant considers that the development has been landscape led and has been informed by the Management Guidelines for LCA 8. In response to comment 1.2.6 regarding mitigation and enhancement measures, the Applicant recognises that beneficial landscape character impacts can arise from mitigation as set out in NPS EN-1 (para 5.10.5).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC1-040	Landscape and Visual	Limestone Lowlands Character Area	1.2.7/1.2.8 The issue of the setting of the CNL remains unresolved with there being stark differences of opinion as to what areas fall within the setting of the CNL. The Council's reasoned opinion is that all land to the north-west of the Fosse Way shares characteristics and permeability with the CNL and therefore is within its setting. Therefore, the landscape proposals which are here shown as mitigation and are in fact enhancement which do not adequately address the issues relating to the location of solar arrays within the CNL setting. 1.2.9 The Council disagrees with this statement on the basis that the proposal is not landscape led, as if it were, the applicant would have recommended not to work to establish solar arrays within the setting of the CNL. This was discussed previously at 'Wiltshire Council Comments on Submissions Received at Deadline 2' (15th June 2026) [REP3-141], Para 5.4.	The Applicant maintains its position that its consideration of the Spatial Extent of CNL setting has been informed by the Cotswolds Position Statement on Development in the setting of the Cotswolds AONB which states: "*The Board considers the setting of the Cotswolds AONB to be the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the Cotswolds AONB*". The Applicant maintains that the Lime Down Scheme has been landscape led and has sought to avoid harm to the CNL. Noting that the CNL Board has acknowledged the enhancement

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				measures on the edge of the CNL has sought to further the purposes of the CNL and its natural beauty located in the setting of the CNL, the Applicant considers the CNL Board also consider the Lime Down Scheme to be landscape led.
WC1-041	Landscape and Visual	Hullavington Rolling Lowland Character Area	**Effects on the Host LCA 8: Hullavington Rolling Lowland Character Area** **Key Characteristics (where pertinent)** Patchwork of irregular, medium sized fields, mainly pasture, and larger more recent enclosures used for arable, especially on the richer soils. The description of effects fails to mention the industrialisation of the landscape as a result of the proposed development and the ancillary works. The fields will not be either pastoral or arable; there will be accesses and hardstanding; BESS; substations, other substantial infrastructure; extensive soil storage and fencing to consider, much of which has	This key feature of LCA 8 is discussed in detail on page 12 and the effects on this key feature are set out on page 20 of the **Limestone Lowlands Character Assessment [REP6B-008]**. The assessment note that land use would change from arable agricultural farmland to solar arrays above grassland. It also recognises the Scheme will maintain the existing field patterns as solar infrastructure would be located (above grassland) within the existing field structure without the need for large scale hedgerow removal or

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			not been assessed as yet. Thus, Wiltshire Council considers that there is a gross misrepresentation of the effects of the proposed development on this key characteristic. Continuous hedges with many mature oaks. The response fails to mention the extent of hedgerow removal. Also, it includes information which bears no relevance to this key characteristic. Fine stone villages with muted colours and dispersed farms. There are five villages within/associated with the Scheme area along with dispersed farms and isolated dwellings. They form a key characteristic of the landscape and thus a key component of the receiving landscape. This built form clearly part of the fabric of the receiving landscape, although the applicant does not include built form as landscape fabric in the LVIA. In response to (ISH2), Action Point-16 [EV8-010] the Council has produced plans showing the possible reduction in solar arrays and infrastructure close to the village of	amalgamation of fields to accommodate the arrays. Proposed new native hedgerows would help to reduce field sizes in a few places which will strengthen the receiving landscape pattern. In relation to continuous hedgerows, the **Limestone Lowlands Character Assessment [REP6B-008]** refers to Annex C of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** which quantifies the loss and provision of hedges and hedgerow trees. With reference to fine stone villages pages 14-17 of the **Limestone Lowlands Character Assessment [REP6B-008]** assesses the five villages in LCA8 associated with the Scheme

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Norton to reduce the potential impact on the landscape setting of, and approaches to the village. Unfortunately, the assessment of landscape effects on this key characteristic has relied heavily on visual assessments and has clearly confused the two in its analysis, particularly in respect of Hullavington. Therefore, the Council does not consider the assessment has adequately analysed the potential landscape effects on this key characteristic and does not agree that there are only localised indirect effects on the five villages. No assessment of the landscape effects on dispersed farmsteads has been undertaken.	and considers the landscape setting of the villages with reference to the visual relationship to the Lime Down Scheme. Please also refer to response to WC1-045 below. The effects of the Scheme on the dispersed farmsteads within LCA8 are individually assessed in the LVIA (refer to **Appendix 8-3-1 Visual Assessment Sheets [APP-190]**, **[APP-191]** and **[APP-192]**).
WC1-042	Landscape and Visual	Hullavington Rolling Lowland Character Area	**Description of Effects** 18 Value, Susceptibility and Sensitivity: Paragraph 8.3.52 of ES, Vol 1, Chapter 8 [APP-060] quotes The Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment 2023 as stating: "Landscape sensitivity to	The **Limestone Lowland Landscape Character Assessment [REP6B-008]** is an additional assessment as requested by the ExA in Action Point 14 and 15 from Issue Specific Hearing 2 (ISH2) **[EV8-010]**. It is completely independent from the Assessments on Landscape Character within the various

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			these very large schemes would be categorised as "high" sensitivity regardless of location, requiring developers to pay particular attention to this issue in their specific applications". Therefore, as the site has an accepted 'High' Receptor Value and a 'High' Sensitivity, its Susceptibility to the change proposed can only be 'High'. The matrix does not allow for downgrading this by ignoring key components of the Landscape Fabric. The downgrading of the Sensitivity of the landscape to Medium in the assessment is not considered acceptable. Magnitude: The Magnitude of change on the landscape character resulting from the proposed development has been grossly underestimated and has not considered the large areas of earthworks, spoil storage and areas of panels and associated infrastructure. There will be extensive and wide-ranging changes to the landscape	Study Areas and Landscape Fabric undertaken in the **LVIA [REP6B-004]**. Judgements on the Value and Susceptibility and subsequent Sensitivity of the Character Areas are therefore different than in the LVIA and is robustly assessed and justified within the report. The Applicant maintains its view that the overall sensitivity of the Hullavington Rolling Lowland Character Area (LCA8) which is wholly outside of the CNL has a Medium sensitivity to the proposed Scheme. In consideration of the large area of LCA8 which extends from Malmesbury in the north and Chippenham in the south, as well as the character of the receiving landscape of gently rolling hills and shallow valleys, the Applicant maintains its view that the magnitude of change resulting from the Lime Down

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			components and the landscape character introducing an industrialising 9.5km wide industrialising swath of large scale solar PV/BESS development across almost the entire width of the 'Hullavington Rolling Lowland' and 'Malmesbury-Corsham Limestone Lowland' Landscape Character Areas. Throughout the project the nature of effect will remain Adverse in the Council's opinion.	Scheme (representing 3.41% of the Character Area) is Low at all stages of the Scheme. As set out fully in the **Limestone Lowlands Character Assessment in [REP6B-008]** there are six primary reasons why the solar arrays and other associated infrastructure would not become a defining feature on the landscape. These include: • the dispersed nature of the Sites; • the nature of Scheme being 'overlaid' and reversible; • The strong framework of existing vegetation which is retained and enhanced; • the benefits of mitigation and enhancement measures; • the substantial Biodiversity Net Gains which would be delivered; and • the Legacy Landscape that will develop as a consequence of the development.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC1-043	Landscape and Visual	Malmesbury-Corsham Limestone Lowlands	**Effects on the Host LCA 16A: Malmesbury-Corsham Limestone Lowlands** **Key Characteristics (where pertinent)** Peaceful rural landscape. There will be significant effects on the rurality of the receiving landscape and the tranquillity of the landscape and the fact that the development is described as disaggregated/dispersed in nature means that the adverse effects will be spread over a wide area. They will not be confined to construction as suggested and will include significant adverse effects during the developments' operational/maintenance and decommissioning phases. Strong network of hedgerows, hedgerow trees and occasional woodland copses. The response fails to mention the extent of hedgerow removal. Also, it includes information which bears no relevance to this key characteristic. Remaining areas with medieval field pattern. The	The Assessment recognises that the overall effects of the Lime Down Scheme on LCA 16 would be Adverse at all stages of the development. The Applicant considers that the Very Low magnitude of change is not underestimated given the scale of the development within the large geographical extent of the Character Area.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			assessment states that: Land use will change from arable agricultural farmland to solar arrays above grassland. This, as well as associated infrastructure including fencing, access tracks, BESS and substations will have a notable change on land use. The Council accepts this as an accurate description of the effects of the proposals on the fields. However, it is concerned that this does not accurately transfer to the assessments.	
WC1-044	Landscape and Visual	Malmesbury-Corsham Limestone Lowlands	**Description of Effects** Value, Susceptibility and Sensitivity: Paragraph 8.3.52 of ES Chapter 8 [APP 060] quotes The Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment 2023 as stating: "Landscape sensitivity to these very large schemes would be categorised as "high" sensitivity regardless of location, requiring developers to pay particular attention to this issue in their specific applications". Therefore, as the site has	The Applicant does not consider that the Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment 2023 is comparable to the **Limestone Lowland Landscape Character Assessment [REP6B-008]** as it is a generic assessment and not specific to the development proposed. Judgements on the Susceptibility of a receptor, as noted in GLVIA paragraph

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			an accepted 'High' Receptor Value and a 'High' Sensitivity, its Susceptibility to the change proposed can only be 'High'. The matrix does not allow for downgrading this by ignoring key components of the Landscape Fabric. The downgrading of the Sensitivity of the landscape to Medium in the assessment is not considered acceptable. Magnitude: The Magnitude of change on the landscape character resulting from the proposed development has been grossly underestimated and has not considered the large areas of earthworks, spoil storage and areas of panels and associated infrastructure. There will be extensive and wide-ranging changes to the landscape components and the landscape character. Throughout the project the nature of effect will remain Adverse. These comments apply equally to the resulting effects corresponding to the	3.26, "*relate to the type of change arising from the specific proposal*". The Applicant considers that given the scale of the Lime Down Scheme within the geographical extent of the Malmesbury-Corsham Limestone Lowlands Character Area the Very Low magnitude of change is not underestimated and that there would be Minor Adverse effects at all stages of the development.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			host Landscape Character Type and Landscape Character Area's.	
WC1-045	Landscape and Visual	Malmesbury-Corsham Limestone Lowlands	**Cumulative Landscape Effects** It is important to reiterate the Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment 2023 guidance (as also detailed above) which states: "Landscape sensitivity to these very large schemes would be categorised as "high" sensitivity regardless of location, requiring developers to pay particular attention to this issue in their specific applications". This equally applies to the assessment of cumulative landscape effects. Whilst cumulative effects are different to the Landscape character effects discussed above, and are a higher level of assessment, they should include: changes on the fabric of the landscape, the aesthetic and perceptual aspects of the landscape, and the overall character (GLVIA3 para 7.25). Thus, the cumulative effects ultimately result in the	The LVIA acknowledges that Lime Down Sites A, B and C are of High Value when considered within the 1km and 2km Study Areas due to these siters being within the setting of the CNL. However, when considering the value within the wider 5km Study or LCA 16A as assessed in the **Limestone Lowland Landscape Character Assessment [REP6B-008],** the value associated with CNL dissipates due to the Character Area's large geographical extent. At this scale of assessment only Landscape Character Areas within the CNL are judged as having High Value Landscapes and denoted by its designation. It is agreed that any assessment of effects on landscape character, whether

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			judgement as to whether the landscape character has changed to such an extent that it becomes a new landscape type or sub-type (GLVIA3 para 7.26). Unfortunately, the applicant has muddled visual and landscape characteristics in their assessment. To achieve an accurate assessment, cumulative visual effects should be considered as a totally separate exercise. Due to the disaggregated nature of the proposed development sites and long cable route corridor, both intra-project and inter-project cumulative effects have been assessed, which is welcomed. It is accepted that the cumulative landscape effects are likely to be lower than those assessed in the landscape assessment and LVIA, but this is to be expected as the analysis is based on different assessment criteria. However, the Council maintains its stance that the value, susceptibility and sensitivity have	cumulative or not, should consider the aesthetic and perceptual aspects of the landscape. The Applicant considers that the visual appearance of the landscape experienced through 'sight' is one of the most important perceptual elements of landscape character. This is evidenced in the illustration by Natural England and shown at paragraph 2.1.10 of the **Technical Note on Landscape Fabric and Landscape Character [REP1-121]**. Cumulative landscape assessment therefore must consider the visual aspects of landscape character. The Applicant maintains its position that the character of the receiving landscape with its existing and reinforced

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			been consistently downplayed, leading to a general under-assessment of the level of effect.	framework of vegetation and its gently rolling topography which limits visibility will ensure that the development sits comfortably within the landscape.
WC1-046	Landscape and Visual	GLVIA	Conclusions The Assessment considers that there are Moderate/Minor Adverse (non significant) effects recorded across the receiving/host LCA8 and Minor Adverse (non-significant) recorded across LCA 16A and the attendant LCTs. The Council considers that there has been a consistent downplaying of the level of effect throughout the LVIA and this assessment. The Council does not agree that the dispersed nature of the sites supports their assimilation into the receiving landscape, it merely spreads the effects over a much larger area and affects more receptors. The scheme is not entirely reversible without considerable earthworks, infrastructure removal and disruption of the receiving landscape. Parts are overlaid but a large proportion relies on excavation and hardstanding plus spoil storage. The	When considering the overall effects of the Lime Down Scheme on the Host Landscape Character Area (LCA8 and 16A) both the adverse and beneficial effects of the Scheme on its key features are considered. Wiltshire Council acknowledges and welcomes the Legacy Landscape benefits of the Scheme which are provided by both visual mitigation measures and enhancement measures (noting that NPS EN-1 recognises at para 5.10.5 "…*there may also be beneficial landscape character impacts arising from mitigation*"). The Applicant agrees that effective monitoring with adaptive management

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Council is not convinced that the existing framework of vegetation will ensure that the development sits comfortably within the landscape. The extent of the structures across hundreds of hectares with their attendant infrastructure, hardstanding and spoil storage will have a considerable adverse effect on the character of the receiving landscape. The assumed benefits of mitigation have once again confused mitigation and enhancement. Biodiversity Net Gain is deliverable but is a matter for the ecology specialists to agree. The Legacy Landscape objectives which seek to deliver greater species variety, greater age variation of woody plants, enhanced landscape structure, improved resilience to pest and disease and climate change and reinforcement of local landscape character where appropriate, within the sites are of course welcomed and supported by the Council. While there can be no planning certainty that the	measures would help to increase levels of certainty to help achieve a beneficial legacy landscape. The Applicant maintains its position that the existing and reinforced framework of vegetation and the gently rolling topography of the host Landscape Character Area which limits visibility will ensure that the development sits comfortably within the landscape.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			legacy landscape presented within the illustrative photomontages [REP5-100] will be delivered at the end of 60 years, given landscape legacy effects will very much depend on the effective establishment and ongoing management of the planting for the life of the project. The legacy landscape will also be at the final discretion of individual landowners and environmental protections in force at decommissioning. However, it is also accepted by the Council, that with successful establishment and good management of planting including retention by landowners following decommissioning, then the legacy landscape could look similar to the representative legacy landscape photomontages **[REP5-100]**. The issue is one of certainty. The Council considers effective monitoring with adaptive management measures could help to increase levels of certainty to help achieve a beneficial legacy	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			landscape. The Council considers that long-term beneficial landscape effects are important for the project to deliver considering the projects long lifespan and the corresponding agricultural land use change, lasting for up to 60 years. This is because the changed land use will exclude landowners, farmers and land managers from future funding streams, which might otherwise be open to achieve similar or possibly even better landscape outcomes through participation in Higher-Level Stewardship, Environmental Land Management schemes, or other Agri-environment or Agri forestry schemes that will likely emerge over the next 60 years.	
WC1-047	Landscape and Visual	Transformation of the Landscape	**Transformation of the Landscape** Wiltshire Council considers that, despite the proposed screening of the various built elements of the Lime Down proposals, screening will not be 100% effective in all instances for all receptors,	The **LVIA [REP6B-004]** recognises that not all visual effects can be fully mitigated. This predominantly relates to footpaths which diagonally cross fields where the introduction of screening

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			which the Council believes the applicant accepts. The Council's view is that the receiving landscape will become significantly industrialised as a result of the Cumulative Landscape Effects of Lime Down and other solar related developments within the area. Wiltshire Council's opinion is that the development of solar installations across the DCO area and its surroundings, will result in significant changes to the key characteristics and peoples' perceptual experience of the receiving landscape. In the Council's view these changes are unlikely to result in the designation of an entirely new Landscape Type, as many characteristics will remain, but could require the designation of a new Landscape Sub Type or Landscape Character Area, based on the preponderance of solar array and BESS development within the agricultural landscape.	would be inappropriate to the landscape legacy. The LVIA also recognises that there are significant adverse effects within the 1km Study Area at Construction and Year 1 and that the land use change from agriculture to solar infrastructure will change this key characteristic and peoples' perceptual experience of the receiving landscape. The landscape change from greenfield land to a renewable solar scheme is considered to represent an adverse effect of the highest level (Major Adverse and Significant). However, due to the dispersed nature of the Sites within the Scheme, the strong framework of existing vegetation and the nature of the topography of the receiving

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				landscape the adverse effects of the Lime Down Scheme on the wider landscape dissipates quickly with distance. The Applicant considers that as all other characteristics will remain, the introduction of the solar arrays and other associated infrastructure would not become a defining feature of the landscape once operational (e.g. at year 1 and year 15). As set out fully in the **Limestone Lowlands Character Assessment [REP6B-008]** there are six primary reasons for this: • the dispersed nature of the Sites; • the nature of Scheme being 'overlaid' and reversible; • the strong framework of existing vegetation which is retained and enhanced;

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				• the benefits of mitigation and enhancement measures; • the substantial Biodiversity Net Gains which would be delivered; and • the Legacy Landscape that will develop as a consequence of the development.
WC1-048	Socio-Economics, Tourism and Recreation	Equine Business Report	**Equine Business Report** Wiltshire Council would like to thank the applicant for this report, which does highlight the importance of the equine sector to the rural economy, and recognises the clustering of training and breeding activities within the 5km study area and the surrounding area. It also notes existing financial pressure on the sector with cost increases on the businesses and cost of living pressures on participants which may lead to less demand. We are grateful that the applicant has completed the survey of equine businesses but are disappointed by the small number of responses. This	The Applicant appreciates Wiltshire Council's review of the **Equine Business Report [REP5-105]**. While the report details equine business specific considerations, the Applicant does not consider that the report identifies any impacts to the equine business sector that are different to the assessment outcomes in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, i.e. that there are no significant adverse effects to business sectors as a result of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			may be due to the tight timescales the recipients had to respond and/or due to some of the information that was requested. Wiltshire Council still has a number of concerns: • Dust – we note the mitigation measures the applicant is putting in place and welcome the opportunity to request to see the logs of on-site and off-site dust inspections. However, bearing in mind the restriction on construction activity when the soil is waterlogged which means most construction activity will occur over the summer months, and the increasing prevalence of long, hot and dry summers we feel this will still be an issue.	The Applicant notes that a relatively small number of responses (8no.) to the report questionnaire were received, of approximately 30no. issued. This does, importantly, include four of the closest equine businesses to the Solar PV Array and BESS areas, and a range of business types, including stud farms, liveries, competition training facilities, and an equine health centre. As such, the Applicant is confident that the responses received represented a helpful sample of local equine businesses. The Applicant is cognisant of the potential impacts of construction dust on equine health, hence their inclusion for review in Section 4.2 of the **Equine Business Report [REP5-105]**. The Applicant team is therefore confident that concerns around dust have been suitably captured, with robust dust suppression and monitoring measures

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				set out in Table 9 of the **Outline Construction Environmental Management Plan [REP6-029]** and secured by Requirement 13 in Schedule 2 to the **Draft DCO [REP6-005]**.
WC1-049	Socio-Economics, Tourism and Recreation	Equine Business Report	As has been noted, horses are very sensitive to unexpected changes in their environment and are well known for their flight response to unexpected noise. (There have been a number of widely reported incidents in London with well trained, military horses for instance) We appreciate the mitigation measure that will be put in place and the proposed dialogue with equine businesses but still feel there is the possibility of horses being frightened which could lead to injury to both horse's and staff/rider, depending on the situation. There have been representations stating that blacksmiths have stated they would not attend during the construction phase for this reason.	The Applicant refers to its previous responses to Wiltshire Council at WC-149 to WC-151 of **The Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**. These set out how the **Equine Business Report [REP5-105]** responds to concerns made in respect of equine health, and the safety of riders, business staff, and contracted equine workers such as farriers. The mitigation measures secured through the Requirements in Schedule 2 of the **Draft DCO [REP6-005]** ensure no significant adverse effects to equine businesses are likely to occur.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant notes representations citing incidents involving horses in urban environments. Incidents in densely populated urban settings generally occur within busy, enclosed, and unpredictable environments. In contrast, horses kept in rural settings routinely encounter agricultural machinery and rural vehicle movements. Academic evidence and expert veterinary input evaluated within the **Equine Business Report [REP5-105],** demonstrate that horses adapt to novel auditory and visual stimuli through habituation when exposed to recurring, non-threatening activities. In open pasture or paddock settings, a horse's initial response to novel noise is to employ aversive positioning by moving to the opposite side of the field,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				increasing physical separation and reducing perceived threat. The Applicant addresses the operational requirements of farriers and blacksmiths within the **Equine Business Report [REP5-105].** The Farriers Code of Professional Conduct requires a calm, controlled working area free from sudden noise or movement behind the horse. As set out in the **Equine Business Report [REP5-105],** where farriery takes place inside stabling or farm buildings situated more than 30 metres from active construction areas, horses remain calm or merely alert. To ensure working environments remain safe and predictable, the Applicant has committed to early notification procedures through an independent equestrian expert appointed to the Community Liaison Group (CLG) and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				secured via the Stakeholder Communications Plan. These are secured through Requirements 4 and 13 in Schedule 2 to the **Draft DCO [REP6-005]**.
WC1-050	Socio-Economics, Tourism and Recreation	Equine Business Report	We are concerned to read that all the [Redacted by Planning Inspectorate] Yatton Keynell will have to be relocated while the cable is being installed. We would like to know if compensation is being negotiated with the business owner. 3.4.2 – possible typo as text includes t Error! Reference source not found. (*Applicant note – copied verbatim from WC submission)*	The Applicant confirms that dialogue with the owner's land agent of Park Farm, Yatton Keynell is ongoing to negotiate Heads of Terms for a voluntary agreement. Compensation for all parts of their business affected by the construction of the Cable Route Corridor are included within the Heads of Terms. The Applicant has responded to comments made by the relevant landowner(s) at Section 2.19 of **The Applicant's Response to Submissions Received at Deadline 4 [REP5-098]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant notes the typographical error at paragraph 3.4.2 of the **Equine Business Report [REP5-105]**. This is a cross-referencing error and has been updated at Deadline 7 in the **Equine Business Report [EN010168/APP/9.62]** (Revision 2) to read *"Annex A Index and Map of Equine Businesses and Equestrian Facilities"*, in reference to the identified equestrian businesses within the scope of the report.
WC1-051	Socio-Economics, Tourism and Recreation	Equine Business Report	Jobs and Economic Impact– the applicants estimate of up to 340 FTE jobs supported by the equine sector within 5km of the scheme is a significant number, as is the estimated up to £11m contribution to GVA. Any business closures in the area would have a adverse impact on the economy of the local area. When you add the up to 750 jobs and up to £35m GVA from the wider supply chain the economic importance	The Applicant confirms these are the upper estimates for employment and economic value of the sector in the 5 km Study Area and the wider assessed supply chain area, as identified in the **Equine Business Report [REP5-105]**. For reference, these respectively are less than 0.6% of the quantum of employment identified in the 5 km Study

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			of this sector to the economy becomes apparent.	Area (see Section 2.1 of the **Technical Note on Impacts to Non-Equine Businesses [REP5-111]**), and less than 0.1% of the workforce in the originally assessed 20 km Study Area (see paragraph 16.7.22 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**). The Applicant is confident that the Scheme design and the mitigation measures as specifically identified in Section 5 of the **Equine Business Report [REP5-105]** are sufficient to ensure that no significant adverse effects to any single equine business, nor to the wider supply chain, is likely, as summarised at Section 4.4 of the **Equine Business Report [REP5-105]**. This is therefore consistent with the assessment outcomes in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** that no significant effects to business

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				sectors are anticipated as a result of the Scheme at any phase.
WC1-052	Socio-Economics, Tourism and Recreation	Equine Business Report	• The case studies supplied by the applicant do provide some re-assurance. With these in mind, and the confident assertion by the applicant that the economic impact on the equine sector during the lifetime of this scheme and during the construction phase will be minimal, we see no reason why the applicant would not agree to a business compensation scheme as has been proposed.	The Applicant refers to its response to SE2.1 in **The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]** which sets out the extent of mitigation secured by the Applicant through the **Draft DCO [REP6-005]** and why that therefore would mean a business compensation scheme is redundant, goes beyond any measure to ensure the DCO is acceptable to be consented, and that is unprecedented for a project of this nature.
WC1-053	Landscape and Visual	Stop Lime Down D5 Response - Fosseway	**Stop Lime Down D5 Response CH2.3**: **Direct Impact on the Fosse Way – Page 030:** Any such impacts would be mitigated by any such sites either being scoped out of the development or 'preserved by record' via a series of mitigation	As stated in response SLD1-002 to SLD1-005 of **The Applicant's Response to Submissions Received at Deadline 5 [REP6-060]** the Applicant has identified that there are no direct impacts to the Fosse Way.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			excavations, or by the spacing of solar panels away from isolated features. The Fosse Way will still be visible in the landscape following development and will still be a navigable road.	Mitigation proposed for archaeological sites located adjacent to the Fosse Way is detailed in the **Outline Archaeological Mitigation Strategy [REP6-012]**- see Table 6.1.1: Archaeological Mitigation Strategies. The AMS will be secured through Requirement 12. The Applicant considers the proposed mitigation to be in line with appropriate standards and guidance, and has been devised in consultation with WCAS (see response to WC1-013) and Historic England.
WC1-054	Cultural Heritage	Outline Archaeological Mitigation Strategy	**27. APP-230 Outline Archaeological mitigation Strategy – Page 119 – Para 3.1.156** 27.1. No excavations are proposed on the Scheduled Monument in Field 120. The cable route will not impact this monument.	The Applicant agrees with Wiltshire Council that there would be no impact to the Scheduled Monument as a result of the Scheme. As identified in the **Archaeological Mitigation Strategy [REP6-012]**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Para 3.1.158 & 159: A program of public outreach will be part of the archaeological works carried out ahead of construction. No HDD is currently proposed in Field 120. A program of Strip, Map and Record excavation will be conducted during topsoil stripping of the cable route, well away from the Scheduled Monument.	(updated at Deadline 6), strip, map and sample or HDD is proposed in Field120 to the west of the Scheduled Monument (see Table 6.1.1: Archaeological Mitigation Strategies).

Table 2-2 Wiltshire Council – Comments on Responses to the ExA's Second Written Questions (ExQ2) [REP6-067]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC2-001	Scheme Description and DCO Process	Management Plans	**Ref**: DCO2.1 **Question**: Residual issues with the dDCO and management plans **WC Comment:** [Blank]	The Applicant has no further comments.
WC2-002	Transport and Access	Highway Authority	**Ref:** DCO2.2 **Question:** Article 2 - definition of relevant highway authority **WC Comment:** No Wiltshire comment	The Applicant has no further comments.
WC2-003	Ecology and Biodiversity	Environmental Management Plan	**Ref:** DCO2.3 **Question:** Article 2 - PPW Environmental Management Plan **WC Comment:** Rev 5 defines the permitted preliminary works environmental management plan and requires PPW to be carried out in accordance with it under Requirement 13. **Not resolved:** Rev 5 still does not require LPA approval of the PPW EMP before PPW are carried out.	The Applicant refers Wiltshire Council to its response given to DCO2.1b in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC2-004	Construction and Decommissioning	Operation and Maintenance	**Ref:** DCO2.4 **Question:** Article 2 - definition of "maintain" **WC Comment:** **Not resolved:** Wiltshire supports the ExA's proposed amendment to the definition of "maintain" so that maintenance does not include the removal, reconstruction or replacement of the whole of the authorised development: • The amendment would not prevent assessed scheduled replacement of solar modules or BESS units during the operational life of the scheme, where that replacement remains within the assessed and secured parameters. • The Applicant's reliance on Article 5(3) is not an adequate substitute. Article 5(3) is an environmental-effects limitation only; it does not define the legal scope of the maintenance power and does not, in terms, prevent the undertaker from self-certifying the	The Applicant refers Wiltshire Council to its response given to DCO2.4 in the **Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]** and to its response given to DCO2.1a in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**. The Applicant's position on this matter remains unchanged.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			removal and replacement of all material components as maintenance if the undertaker considers the effects to be no materially new or materially different than those assessed. • There is no requirement for prior notification to the Council that the replacement falls within assessed parameters and does not give rise to materially new or different effects. • Without the ExA's wording, the definition would allow the maintenance power to become a proxy authorisation for whole-scheme renewal by component, by phase, or sequentially over time. That could include replacement involving materially different technology, altered layout, materially different construction methodology, new foundations, a new cabling strategy, changed BESS design, or whole-scheme repowering, where the undertaker considers the effects to be no materially new or materially different to those assessed.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			The ExA's limitation (or equivalent) appears in a large body of recently-made DCOs including Longfield, Cottam, Gate Burton, Sunnica, West Burton, Oaklands, Heckington Fen, Byers Gill, East Yorkshire, Tillbridge, Springwell, Fenwick and Peartree Hill. It should therefore be adopted to preserve the ordinary distinction between maintenance of an authorised development and the removal, reconstruction or replacement of the authorised development as a whole.	
WC2-005	Soils and Agriculture	EIA	**Ref:** DCO2.5 **Question:** Article 6 - EIA Agriculture Regulations modification **WC Comment:** No Wiltshire comment **Ref:** DCO2.6 **Question:** Article 7 - statutory nuisance defence **WC Comment:** No Wiltshire comment	The Applicant has no further comments.
WC2-006	Transport and Access	Construction Traffic	**Ref:** DCO2.7	The Applicant refers Wiltshire Council to its response given to DCO2.7 in the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Management Plan	**Question:** Article 16 - traffic regulation measures Q1 **WC Comment:** **Not resolved:** • Wiltshire supports the ExA's proposed amendment to Article 16(4)(b), that the traffic authority's written consent should be obtained as part of the construction traffic management plan in Schedule 2, Requirement 15 • Article 47 deemed consent should not apply to traffic authority consent under Article 16	**Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]**. The Applicant's position on this matter remains unchanged.
WC2-007	Transport and Access	Traffic Regulation Measures	**Ref:** DCO2.8 **Question:** Article 16 - traffic regulation measures Q2 **WC Comment:** **Not resolved:** • Rev 5 retains the four-week notice period in Article 16(5)(a) rather than Wiltshire's eight-week compromise. • The issue is not whether a single statutory provision specifies an eight-	The Applicant refers Wiltshire Council to its response given at DCO2.8a in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**. The Applicant's position on this matter remains unchanged.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			week DCO period; the issue is that four weeks is insufficient for Wiltshire to discharge its traffic authority and network-management functions properly. • The eight-week period remains the pragmatic minimum, reduced from the ordinary 12-week TTRO / major permit lead-in.	
WC2-008	Transport and Access	Traffic Regulation Measures	**Ref:** DCO2.9 **Question:** Article 16 - traffic regulation measures Q3 **WC Comment:** No Wiltshire comment	The Applicant has no further comments.
WC2-009	Landscape and Visual	Tree Felling	**Ref:** DCO2.10 **Question:** Article 40 - felling/lopping trees and hedgerow removal Q1 **WC Comment:** No Wiltshire comment	The Applicant has no further comments.
WC2-010	Landscape and Visual	Hedgerow Removal	**Ref:** DCO2.11 **Question:** Article 40 - insertion of "only" **WC Comment:** **Not resolved:**	The Applicant refers Wiltshire Council to its response given to DCO2.11 in the **Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]**. The

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• Rev 5 Article 40(4) still authorises removal of hedgerows listed in Parts 1 and 2 of Schedule 12 "to the extent set out" in the EPMS approved under Requirement 8. The requested placement of "only" has not been adopted. • Rev 5 does not quantify the specific lengths of hedgerow authorised for removal in Schedule 12. The Council's precision/enforceability concern therefore remains. • Schedule 12 should identify the authorised extent of removal by measured lengths, or at least minimum/maximum extents, by reference to the approved plans, with the EPMS and HRA controls operating as further limits rather than as the only operative control.	Applicant's position on this matter remains unchanged.
WC2-011	Landscape and Visual	Arboriculture	**Ref:** DCO2.12 **Question:** Article 41 - TPO trees **WC Comment:** Rev 5 includes the five working day notice provision for non-urgent Article	The Applicant refers Wiltshire Council to its response given to DCO2.1i in the **Applicant's Response to Submissions Received at Deadline 5**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			41(1)(b) TPO works. Wiltshire's arboricultural officers considered that period reasonable for TPO trees. **Not resolved:** • Rev 5 does not extend the notice protection to trees within Conservation Areas subject to section 211 TCPA 1990 notification requirements.	**[REP6-060]**. The Applicant's position on this matter remains unchanged.
WC2-012	Scheme Description and DCO Process	General	**Ref:** DCO2.13 **Question:** Article 47 - procedure in relation to certain approvals etc. **WC Comment:** No Wiltshire comment	The Applicant has no further comments.
WC2-013	Construction and Decommissioning	Maintenance and Drainage	**Ref:** DCO2.14 **Question:** Article 50 - maintenance of drainage works **WC Comment:** Rev retains Article 50, which is supported by Wiltshire as the provision preserves drainage maintenance responsibilities unless otherwise agreed.	The Applicant has no further comments.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC2-014	Scheme Description and DCO Process	General Remarks	**Ref:** DCO2.15 **Question:** Multiple requirements - National Highways consultation **WC Comment:** No Wiltshire comment **Ref:** DCO2.16 **Question:** Requirement 11 - surface and foul water drainage **WC Comment:** No Wiltshire comment **Ref:** DCO2.17 **Question:** Requirement 20 - decommissioning and restoration Q1 **WC Comment:** No Wiltshire comment **Ref:** DCO2.18 **Question:** Requirement 20 - abandoned or decayed works **WC Comment:** No Wiltshire comment **Ref:** DCO2.19 **Question:** Requirement 20 - decommissioning phasing/report/certificate **WC Comment:** No Wiltshire comment **Ref:** DCO2.20	The Applicant has no further comments.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Question: Proposed new requirement - register of requirements **WC Comment:** No Wiltshire comment	
WC2-015	Arboriculture	Arboricultural Assessments	**Ref:** DCO2.21 **Question:** Schedule 13 - missing certified documents **WC Comment:** Not resolved: The Arboricultural Impact Assessment and Arboricultural Method Statement are not clearly included as certified documents.	The Applicant refers Wiltshire Council to its response given to DCO2.1s in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**. The Applicant's position on this matter remains unchanged.
WC2-016	Scheme Description and DCO Process	General - No Comment	**Ref:** DCO2.22 **Question:** Schedule 14 - confidentiality clause in arbitration rules **WC Comment:** No Wiltshire comment	The Applicant has no further comments.
WC2-017	Scheme Description and DCO Process	Schedule Provisions	**Ref:** DCO2.23 **Question:** Schedule 15 - protective provisions: status and proposed revisions **WC Comment:** Schedule 15/Part 9: Rev 5 retains the Article 17 substitution clause as requested by Wiltshire/LLFA	The Applicant welcomes Wiltshire Council's confirmation that the amendment to Article 17 has resolved the issue previously raised regarding its interaction with Part 9 of Schedule 15.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC2-018	Transport and Access	Protective Provisions	**Ref:** DCO2.24 **Question:** Local highway authority protective provisions: variances and hierarchy **WC Comment:** Not resolved: Schedule 15/Part11 - Protective Provisions for the local highway authority • Rev 5 adopts most of the Council's substantive protective provision amendments, including the wider prior approval regime, permit scheme interface, condition survey and highway damage redress wording, Article 47 exclusion, mud deposit, indemnity and expert determination. • The outstanding points are few but critical - the application/scope wording, the missing estimated cost of works definition, the maintenance trigger being tied to application rather than issue of the final certificate **The Council has submitted a draft tracked-change version of the Rev 5 protection provisions and**	The Applicant welcomes Wiltshire Council's comment that most of its substantive suggested amendments have been addressed. The Applicant is committed to continued negotiations with Wiltshire Council in respect of the points that remain outstanding.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			explanatory note with these comments at Deadline 6.	
WC2-019	Scheme Description and DCO Process	General – No Comment	**Ref:** DCO2.25 **Question:** Protected provisions for National Grid Electricity Transmission Asked: No - directed to Applicant / NGET **WC Comment:** No Wiltshire comment **Ref:** DCO2.26 **Question:** Protected provisions for the Environment Agency Asked: No - directed to Applicant / Environment Agency **WC Comment:** No Wiltshire comment **Ref:** DCO2.27 **Question:** Protected provisions for National Highways Asked: No - directed to Applicant / National Highways **WC Comment:** No Wiltshire comment	The Applicant has no further comments.
WC2-020	Scheme Description and DCO Process	Schedule 16	**Ref:** DCO2.28 **Question:** Schedule 16 - fees Q1 **WC Comment:**	The Applicant refers Wiltshire Council to its response to DCO2.28 in the **Applicant's Response to the Examining Authority's Second**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Not resolved: • Rev 5 Schedule 16 now includes a dynamic fee mechanism for the discharge of Requirement 20 only. That is a partial concession but does not address Wiltshire's wider concern. • The other discharge fees remain fixed; there is no general wording adding "or the fees applicable at the time of application by the Applicant"; and there is no general CPI/uplift mechanism. • Rev 5 retains ten weeks for determination, not Wiltshire's requested twelve weeks. The 20 working day outer period for further-information requests where consultees are involved has been adopted, which is welcome. • Wiltshire maintains that it must not be financially disadvantaged in discharging requirements over a 60-year scheme life. A PPA may assist, but it is not a substitute for a clear DCO fee/cost-recovery mechanism.	**Written Questions [REP5-097]** and its response to DCO2.1u in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**. The Applicant's position on this matter remains unchanged.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC2-021	Scheme Description and DCO Process	General – No Comment	**Ref:** DCO2.29 **Question:** Schedule 16 - fees Q2 **WC Comment:** No Wiltshire comment	The Applicant has no further comments.

Table 2-3 Wiltshire Council – Proposed Amendments to Protective Provisions Schedule 15, Part 11 of Rev 5 dDCO [REP6-066]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC3-001	Scheme Description and DCO Process	Introduction	Explanatory note: Wiltshire Council proposed amendments to Schedule 15, Part 11 This note accompanies Wiltshire Council's proposed tracked amendments to Schedule 15, Part 11 of the Rev 5 dDCO. It identifies the remaining critical amendments which Wiltshire asks the ExA and Secretary of State to adopt if the local highway authority protective provisions are not otherwise agreed.	Protective provisions with Wiltshire Council have now been agreed and incorporated into the **Draft DCO [EN010168/APP/3.1]** (Revision 7) at Deadline 7. As South Gloucestershire Council is the Local Highway Authority for a portion of the highway works, the Applicant has shared a copy of the agreed Protective Provisions with South Gloucestershire Council and awaits any comments from them on the Protective Provisions.
WC3-002	Scheme Description and DCO Process	Scope/application Art 139	Rev 5 applies Part 11 only to road works and cable works. Wiltshire's previous submissions explain that construction traffic can affect the local road network outside the footprint of those works. The additional limb is needed so that condition survey, monitoring, highway damage redress, mud control, step-in, cost recovery, security and indemnity	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			provisions are engaged where construction traffic causes, or may reasonably be expected to cause, physical damage, abnormal deterioration, obstruction or contamination of the local road network.	
WC3-003	Scheme Description and DCO Process	"Estimated cost of works" definition Art 140(3)	The bond sum is calculated by reference to the estimated cost of works. Rev 5 omits the definition of that term, leaving the calculation insufficiently anchored. Wiltshire's definition identifies the categories of cost to be included, including temporary works, traffic management, reinstatement, remedial works, testing, supervision, road safety audit remedial measures and other works reasonably required to complete the road works and cable works to the satisfaction of the local highway authority.	See above response to WC3-001.
WC3-004	Scheme Description and DCO Process	"Commuted sum" definition Art 140(3)	Wiltshire can accept reference to a methodology in the outline CTMP only if that methodology remains current when the estimate is prepared. The DCO	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			should not freeze Wiltshire into an outdated methodology or require the undertaker's agreement before a successor published or approved local highway authority methodology can apply.	
WC3-005	Scheme Description and DCO Process	"Detailed design information" definition Art 140(3)	Wiltshire's preferred drafting reinstates electrical work for road lighting, traffic signs and signals as part of road works detailed design information. This is a technical completeness amendment.	See above response to WC3-001.
WC3-006	Scheme Description and DCO Process	Defects period and Maintenance until final certificate Art 148(2)	Rev 5 ends the undertaker's maintenance responsibility when it applies for the final certificate. That is **not acceptable**: 1. The Applicant's amendment is misconceived as a matter of highway law and orthodox highway practice. Under the Highways Act 1980 model, reflected in sections 37 and 38 practice and DfT adoption guidance, the relevant trigger is not the developer's application for certification.	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			2. The relevant trigger is the highway authority being satisfied that the works, maintenance period, defects, remedial works, final information and commuted sum/cost matters have been properly completed. 3. An application for a final certificate proves only that the undertaker says it is ready to hand the asset back; it does not prove that the works have been inspected, that defects have been remedied, that as-built information is complete, that damage attributable to construction traffic has been resolved, or that the highway is in a condition which the public authority should maintain at public expense. 4. The Applicant's amendment would make the end of highway maintenance responsibility turn on the undertaker's unilateral election, rather than on the local highway authority's objective acceptance that the work is complete, safe, defect-free and maintainable.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			5. An application is only the start of the final certificate process. Maintenance should remain with the undertaker until the local highway authority issues the final certificate. 6. This is not a timing issue; it is a transfer of risk from the undertaker to the public highway authority before the authority has accepted the asset as safe and having met objective highways engineering standards. 7. The correct trigger is issue of the final certificate. If the Applicant is concerned about delay, the proper remedy is the dispute mechanism.	
WC3-007	Scheme Description and DCO Process	Expert determination Art 156	Wiltshire can accept the National Highways-style timescales, but the drafting should clarify when the expert is appointed so that there is no open-ended gap between notification of a dispute, identifying an expert and commencement of the 7/7/7 expert process.	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC3-008	Scheme Description and DCO Process	Appendix A	Appendix A: Wiltshire Council proposed amendments to Protective Provisions Schedule 15, Part 11 of the Rev 5 dDCO	See above response to WC3-001.

Table 2-4 Wiltshire Council – Response to Second Written Questions (ExQ2) [REP6-068]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC4-001	Scheme Description and DCO Process	DCO2.23	**Status and Proposed Revisions** As per the examination timetable, all Statutory Undertakers and Wiltshire Council are requested to submit their proposed version of protective provisions that they wish to see included for their benefit in the dDCO but have not been agreed by the applicant. Please also set out why you are not content with the applicant's version in Schedule 15 of Revision 4 of the dDCO [REP4-004], and explain why the ExA and Secretary of State should prefer your suggested drafting. **WC Response:** Wiltshire Council submits with this response the version of the local highway authority protective provisions which it considers should be included in Schedule 15 of the draft Development Consent Order for its benefit. The Council remains in active discussions	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			with the Applicant. The Council returned a further marked-up version of the protective provisions on 10 August 2026. Those discussions are ongoing. However, the provisions have not yet been agreed, and the Council therefore submits its preferred drafting in accordance with the Examination timetable. **1. Why Wiltshire is not content with the Applicant's version** Wiltshire is not content with the Applicant's version of Schedule 15 in Revision 4 of the draft DCO because it does not yet provide a sufficiently robust or complete regime for protecting the local road network, highway assets, road users, and Wiltshire's statutory highway functions. The Council's concern is not that the DCO must replicate an ordinary section 38 or section 278 agreement. Nor is the Council seeking to duplicate the street works, permit scheme or Construction Traffic Management Plan controls. The	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			point is that a DCO confers project-specific statutory powers, including powers to carry out works to and under the local road network. Those powers require project-specific protective provisions which operate directly between the undertaker and the local highway authority. The Applicant's version still leaves material gaps in the following areas.	
WC4-002	Scheme Description and DCO Process	DCO2.23	**2. Scope of the protective provisions** The Applicant's version narrows the application of the protective provisions to road works and cable works. Wiltshire's position is that the protective provisions must also apply to the carrying out, maintenance and decommissioning of the authorised development insofar as those activities, including construction traffic associated with the authorised development, affect or may reasonably be expected to affect the local road network. This is necessary because highway impacts	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			from the authorised development will not necessarily be confined to the footprint of road works or cable works. Construction traffic may cause physical damage, abnormal deterioration, obstruction, contamination, mud on the highway, or other impacts across the local road network. Requirement 15 and the permit scheme are not a substitute for this application wording. They may regulate traffic management, routing, permits and road space coordination, but they do not provide the full protective machinery required by the local highway authority, including direct condition survey approval, monitoring, damage redress, step-in, cost recovery, security and indemnity provisions. Wiltshire's wider application wording is therefore necessary to ensure that the protective provisions apply to the real highway risks generated by the authorised development.	
WC4-003	Scheme Description	DCO2.23	**3. Technical approval and deemed approval**	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	and DCO Process		Wiltshire cannot accept deemed approval for pre-commencement highway technical approvals. The approvals required under the protective provisions concern highway safety, asset protection, road-space coordination, construction methodology, road safety audits, detailed design information, condition surveys, cable depths, geotechnical information, traffic management and compliance with highway specifications. These are not ordinary planning details. The Council accepts that the undertaker requires timely decisions. Wiltshire's drafting addresses that by requiring approvals not to be unreasonably withheld, by requiring written reasons for refusal, and by providing a dispute resolution mechanism. That is the appropriate safeguard against delay. Deemed approval is not appropriate for safety-critical highway matters. If the Applicant requires a longstop mechanism, the	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			appropriate compromise is deemed refusal, not deemed approval. That would preserve the undertaker's ability to challenge delay while avoiding the unacceptable outcome that detailed highway works or cable works could be treated as approved without technical review.	
WC4-004	Scheme Description and DCO Process	DCO2.23	**4. Condition surveys, monitoring and highway damage redress** Wiltshire requires the condition survey, monitoring and highway damage redress regime to be secured directly through the protective provisions. A CTMP may identify construction routes and management measures, but it does not provide the same direct legal protection as the protective provisions. Wiltshire requires an agreed baseline condition survey and monitoring regime, together with a highway damage redress protocol where reasonably required, including recovery of excess maintenance expenses arising from	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			extraordinary traffic associated with the authorised development, including where applicable under section 59 of the Highways Act 1980. These controls are necessary to ensure that the local road network is not left to the public purse where damage or abnormal deterioration is attributable to the authorised development.	
WC4-005	Scheme Description and DCO Process	DCO2.23	**5. Maintenance until final certificate** Wiltshire does not accept the Applicant's proposed amendment which would end the undertaker's maintenance responsibility on application for the final certificate. That approach is misconceived. An application for a final certificate is only the start of the final certification process. It does not establish that the works are acceptable, that all defects have been remedied, that final information has been provided, or that the local road network has been left in a condition suitable for the local highway authority to maintain. The	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			ordinary highways model is that the developer remains responsible until the highway authority is satisfied that the works, maintenance period, defects and final information have been properly completed. The relevant trigger is the issue of the final certificate, not the developer's application for it. Wiltshire's drafting does not give the Council an unfettered ability to delay. The protective provisions require Wiltshire to inspect, identify any further works required, and issue the final certificate once the relevant matters have been resolved. If the Applicant considers Wiltshire is acting unreasonably, the dispute resolution mechanism is available.	
WC4-006	Scheme Description and DCO Process	DCO2.23	**6. Security, bond and commuted sums** Wiltshire requires appropriate security for the road works and cable works, including a bond or cash surety calculated by reference to 120% of the estimated cost of works plus the commuted sum. The security	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			mechanism is necessary because the local highway authority must not be exposed to the risk of having to complete, remedy or make safe works to the local road network at public expense if the undertaker defaults or becomes insolvent. The ability to calculate the security by phase is a proportionate way of addressing the Applicant's delivery concerns. The commuted sum must also be calculated by reference to the local highway authority's current published or approved methodology at the date the estimate is prepared. It should not be fixed by reference to a potentially outdated methodology contained in the Outline Construction Traffic Management Plan.	
WC4-007	Scheme Description and DCO Process	DCO2.23	**7. Costs, mud control and practical highway management** Wiltshire's costs provisions are necessary to ensure that the Council can recover the reasonable costs it incurs in checking, approving,	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			supervising, inspecting and administering the highway aspects of the authorised development. The mud deposit is also justified. It is modest, refundable, and targeted at the practical risk of mud, soil, litter or other deleterious material being deposited on the local road network from multiple dispersed works locations and construction accesses. It does not duplicate the undertaker's primary obligation to keep the highway clean; it provides a practical mechanism for urgent or default cleaning where necessary in the interests of highway safety.	
WC4-008	Scheme Description and DCO Process	DCO2.23	**8. Indemnity** Wiltshire does not accept that its standard section 278 indemnity is the appropriate model for these DCO protective provisions. A section 278 or section 38 agreement is principally concerned with the delivery, inspection, maintenance and adoption of agreed	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			highway works. These protective provisions are wider. They are required to protect the local highway authority against the exercise of statutory powers under the DCO, including works to and under the local road network, cable works, maintenance, removal, reinstatement, decommissioning, interference with highway assets and land, and claims arising under statutory compensation codes. The indemnity must therefore reflect the wider DCO risk profile. A National Highways-style indemnity is more appropriate because it is designed for protective provisions in an Order conferring statutory powers, rather than for a conventional developer highway agreement.	
WC4-009	Scheme Description and DCO Process	DCO2.23	**9. Land and rights affecting the local road network** Wiltshire requires clear protection against the exercise of DCO powers over land forming part of the local road network or land owned by the local	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			highway authority, except with the consent of the local highway authority. This is necessary to ensure that the undertaker cannot acquire, use, interfere with, extinguish rights over, or impose rights on highway land or local highway authority land without proper local highway authority control. That is a proportionate protection for land and assets held by Wiltshire in its statutory highway capacity.	
WC4-010	Scheme Description and DCO Process	DCO2.23	**10. Expert determination** Wiltshire accepts expert determination as an appropriate mechanism for technical highway disputes. However, the clause must preserve the ability to refer disputes concerning legal interpretation to arbitration, and it must not prevent Wiltshire from exercising urgent highway safety or step-in powers where action is needed to protect the public or the local road network. The expert determination process must also avoid any open-ended gap between	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			nomination of an expert and the start of the determination timetable. The expert process should be capable of operating quickly and effectively where highway delivery or safety issues arise.	
WC4-011	Scheme Description and DCO Process	DCO2.23	**11. Why the ExA and Secretary of State should prefer Wiltshire's drafting** Wiltshire's drafting should be preferred because it is targeted, proportionate and directly related to the impacts of the authorised development on the local road network. The drafting does not give Wiltshire a veto over the authorised development. It requires the Council to act reasonably, to give written reasons for refusal, and to engage in expert determination where disputes arise. The protections are confined to matters relevant to Wiltshire's statutory highway functions, including highway safety, asset protection, network management, technical approval, security, cost recovery, maintenance, defects,	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			indemnity and land interests. The Applicant's version relies too heavily on Requirement 15, the permit scheme and general street works controls. Those controls are important, but they do not provide a complete substitute for direct protective provisions in favour of the local highway authority. For these reasons, Wiltshire asks the ExA and Secretary of State to prefer Wiltshire's submitted version of the protective provisions, unless and to the extent that further agreement is reached with the Applicant before the close of the Examination.	
WC4-012	Scheme Description and DCO Process	DCO2.24	**Protected Provisions for The Local Highway Authority** The ExA acknowledges the submission of draft protected provisions for the local highway authority from the applicant [REP4-004] and Wiltshire Council [REP4-092]. From a review of the drafts, the ExA notes for example (but not least) that the definition of "the bond	See above response to WC3-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			sum" and "the commuted sum" are different between the two versions, while the "estimated costs of works" definition provided by the Council has not been included in the applicant's version. The ExA also notes that in the applicant's definition of "the bond sum", sub-paragraph (c) refers to National Highways, when it should refer to the local highway authority. <u>The Applicant:</u> The Applicant is required to identify for the ExA all variances between the two versions and advise what discussions are taking place to resolve these variances. The ExA appreciates that prior to deadline 5 the drafting of the protected provisions for the local highway authority may evolve, such that a revised version of the provisions may be submitted into the examination, but it would nonetheless be helpful to the ExA for the variances from the Council's version to be clearly identified, explained	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			and justified. The Applicant is also asked to explain whether any revisions are required to the drafting of Articles 8 to 16, or Requirement 15 (or the oCTMP) in light of these protected provisions. The ExA is seeking to be absolutely clear on whether Article 47, Schedule 16 or the protected provisions take priority in the consent/ approval arrangements contained within Articles 8 to 16 and Requirement 15. <u>Wiltshire Council:</u> Wiltshire Council is also invited to make submissions if required. **WC Response:** Wiltshire Council notes the ExA's comments regarding the differences between the Applicant's and the Council's versions of the local highway authority protective provisions. This issue is addressed in Wiltshire Council's latest version of the protective	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			provisions. The Council's latest drafting includes: • a definition of "**the bond sum**" calculated by reference to 120% of the estimated cost of works plus the commuted sum; • a definition of "**estimated cost of works**", so that the basis for calculating the bond is clear and objectively referable to the works affecting the local road network; and • a definition of "**commuted sum**", linked to the local highway authority's applicable commuted sum methodology at the date the estimate is prepared, or such other methodology as may be agreed.	
WC4-013	Scheme Description and DCO Process	DCO2.24	The Council agrees with the ExA's observation that the reference to **National Highways** in the Applicant's version should refer to the **local highway authority**. That error is not present in Wiltshire's latest drafting.	This has been addressed in the agreed version of the Protective Provisions incorporated into the **Draft DCO [EN010168/APP/3.1]** (Revision 7) at Deadline 7.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Wiltshire's position is that the Applicant's Revision 4 drafting is deficient because it does not include the Council's definition of "estimated cost of works". Without that definition, the bond sum is not anchored to a clear and comprehensive calculation of the works and associated costs which the bond is intended to secure. This is particularly important because the works may come forward in phases and may include temporary works, traffic management, reinstatement works, remedial works, testing, supervision, road safety audit remedial measures and other works reasonably required to complete the road works and cable works to the satisfaction of the local highway authority. The Council's drafting should therefore be preferred because it provides a complete and coherent security mechanism. It identifies: • what costs are secured;	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• how the estimated cost of works is to be calculated; • how the commuted sum is to be calculated; • how the bond sum is to be derived; and • that the relevant security is to be in favour of, and enforceable by, the local highway authority. WC returned a further marked-up version of the protective provisions on 10 August 2026 and negotiations remain ongoing. However, unless and until an agreed form is reached, Wiltshire asks the ExA and Secretary of State to prefer the Council's latest drafting on these points.	

Table 2-5 Wiltshire Council – Comments on Relevant Representations and Written Representations made in relation to the Change Application [REP6B-014]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC5-001	Transport and Access	RR4960	1. Wiltshire Council Highways RR4960 'Representation by David James Hatherell on behalf of Christopher Charles Wright' - This representation is about the swept path of large vehicles at the junction by Firs Farm which the ExA have already raised with the applicant in their questions. I don't have anything to add to this, other that make the point that the swept paths associated with all HGVs at this junction (including AIL vehicles) will need to be accommodated within the existing public highway.	The Applicant makes note of this comment. The proposed swept path is shown within the existing public highway on drawing PL404B Annex H of the **ES Volume 3, Appendix 13-1 Transport Assessment [REP6-015].**
WC5-002	Transport and Access	RR4960	The respondent refers to the need for detailed plans to confirm that no part of the private land is over-run/overhung by HGVs. The Applicant has provided an updated plan PL404 in Annex H to the Transport Assessment (Rev 5) which shows the swept path tracking of a 16	The Applicant makes note of this comment. Drawing PL404-B is now presented in Annex K of the **ES Volume 3, Appendix 13-1 Transport Assessment [EN010168/APP/6.3]** (Revision 7). The proposed swept path

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			axle AIL carrier through this junction. This shows wheel over-run to the kerbs and body overhang to the wider verge by Firs Farm, However, in the absence of a highway boundary line or indication of highway extents on this plan, it is unclear whether any of the overhang impinges on private land in the ownership of the respondent.	is shown within the existing public highway.
WC5-003	Transport and Access	Farleaze Farm	1. Wiltshire Council Highways Jonathan Seymour-Williams - This written representation relates to Farleaze Farm on Pig Lane and the overall wider impacts that LDSF will have on its setting and future investment decisions. I have no comment on the written content from an HDM perspective.	The Applicant makes note of this comment.
WC5-004	Transport and Access	GCC Change 1	1. Wiltshire Council Highways Gloucestershire County Council - The Council's comments relate only to 'Change 1: An extension of the order	The Applicant makes note of this comment. The Applicant confirms that extensions to the Order Limits needed in the vicinity

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			limits at Lime Down D to allow the emergency access to connect with public highway'. It is stated "GCC officers note there are two change application areas located on junctions just off the A46 north of M4 Junction 18 that are not included or detailed in document "*Change Application and Consultation Report (Revision 1) June 2026". These are near Doddington Wood and Plough Farm College. Although this section of the A46 is outside Gloucestershire's boundary, GCC officers would like to request further information on any access changes for construction traffic that can have impacts on the A46 local highway network in Gloucestershire*". I have no HDM comment on matters relating to the adjoining LHA network, although I am surprised that extensions to the Order Limits needed in the vicinity of Lime Down D would have resulted in any changes to intended works already	of Lime Down D have not resulted in any changes to intended works already proposed on the A46.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			proposed on the A46, which is well to the west.	
WC5-005	Hydrology, Flood Risk and Drainage	No New Matters	2. Comments from Lead Local Flood Authority The Lead Local Flood Authority (LLFA) has reviewed the Relevant Representations and Written Representations identified for Deadline 6B. No new flood risk, drainage, hydrological or water quality matters have been identified through these representations.	The Applicant notes and welcomes the LLFA's confirmation that no new flood risk, drainage, hydrological or water quality matters have been identified from the Relevant Representations and Written Representations submitted at Deadline 6B.
WC5-006	Hydrology, Flood Risk and Drainage	Catchment Resilience	The Forestry Commission representation raises matters that are consistent with the Council's existing position regarding Natural Flood Management, catchment resilience and wider multifunctional environmental benefits, particularly in relation to woodland creation, habitat connectivity and wider catchment functioning. However, these matters are already reflected within the Council's existing	The Applicant notes that the Forestry Commission representation does not introduce any new flood risk evidence, hydraulic modelling, drainage assessment or technical concern and that the matters identified are consistent with the LLFA's existing position.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			flood risk and drainage position and do not introduce any new flood risk evidence, hydraulic modelling, drainage assessments or technical concerns requiring any amendment to the LLFA's existing position.	The consideration of Natural Flood Management and wider multifunctional hydrological benefits has been addressed through the **Lime Down D Natural Flood Management Viability Report [REP5-109]** and the ongoing **Statement of Common Ground with Wiltshire Council [REP6-045]**. The Lime Down D assessment considered whether feasible NFM measures within the Scheme boundary could materially reduce downstream flood risk at Corston. It identified soil management and riparian buffer measures as the most physically suitable interventions within Lime Down D, while demonstrating that NFM measures applied solely within this part of the catchment would have limited influence on downstream flood risk.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Lime Down D represents less than 8% of the catchment draining to Corston and the modelling demonstrates that the principal flood mechanism at Corston is governed by the wider upstream catchment and localised conveyance constraints within the village. More widely, the Scheme incorporates measures which provide complementary hydrological and environmental benefits, including soil and vegetation management, watercourse and riparian buffers, maintenance of existing drainage pathways and permeable runoff-management measures. These measures and their securing mechanisms are consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP5-102]**. The watercourse and riparian buffers incorporated throughout the relevant

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Solar PV Sites also maintain space alongside watercourses and do not preclude relevant Risk Management Authorities, landowners or other third parties from considering further catchment, riparian or in-channel interventions in the future, subject to the necessary landowner agreement, regulatory consents and detailed assessment. The **Lime Down D Natural Flood Management Viability Report [REP5-109]** also confirms that the Applicant will make the hydraulic model available to support future flood alleviation studies and option assessment. The Applicant therefore considers that the Forestry Commission representation does not alter the conclusions of the flood risk and drainage assessment or

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				establish a need for additional Scheme-wide NFM measures to be delivered as part of the Scheme. The Applicant's position on these matters is set out at Sections 3.7.17 (Draft DCO - OLEMP Buffers & SuDS) and 3.7.19 (Strategic Flood Management and Betterment) of the **Statement of Common Ground with Wiltshire Council [REP6-045]**.
WC5-007	Hydrology, Flood Risk and Drainage	Position Maintained	The remaining Relevant Representations and Written Representations do not raise any new flood risk, drainage or hydrological matters beyond those already considered through the Flood Risk Assessment, Drainage Strategy, supporting management plans and ongoing Statement of Common Ground discussions. Accordingly, the LLFA has no further comments to make in relation to Deadline 6B and maintains its	The Applicant notes the LLFA's confirmation that the remaining Relevant Representations and Written Representations raise no new flood risk, drainage or hydrological matters. The Applicant's position on the matters previously raised by the LLFA similarly remains unchanged and is set out in the updated Statement of Common Ground

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			previously submitted position on flood risk, drainage and hydrology.	with Wiltshire Council, together with the supporting flood risk, drainage and environmental management documents submitted during the Examination.

3 The Applicant's Response to Statutory Consultees, Undertakers and Notable Parties with Whom the Applicant Is Seeking to Undertake a Statement of Common Ground

3.1 Environment Agency

Table 3-1 Environment Agency – Appendix 1: Flood Risk Comments on Updated Documents [REP6-074]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
Lime Down D – Natural Flood Management Viability Report. August 2026. Revision 1 (REP5-109)				
Document Reference(s): Lime Down D – Natural Flood Management Viability Report. August 2026. Revision 1. Options mapping. Figures 8 (option 1) and 9 (option 2) (REP5-109)				
EA1-001	Hydrology, Flood Risk and Drainage	Issue	The comparison mapping in figures 8 and 9 does not clearly demonstrate the spatial impacts of the proposed interventions or clearly identify areas where flood extent is reduced or increased relative to the baseline	The Applicant agrees that the presentation of the modelling results can be improved. Figures 8 and 9 of the **Lime Down D Natural Flood Management Viability Report [EN010168/APP/9.66]** (Revision 2) have therefore been updated for Deadline 7 to present water level differences between the baseline and Options 1 and 2. The revised figures distinguish areas where flood levels increase or decrease and identify areas which are wet in the baseline but dry with the intervention in place, and vice versa. The

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				accompanying text has also been updated to explain the changes shown.
EA1-002	Hydrology, Flood Risk and Drainage	Impact	It is difficult to fully understand the flood risk changes due to the Option 1 and Option 2 interventions	The Applicant notes the Environment Agency's comment. The revised mapping and accompanying explanation described in EA1-001 provide a clearer representation of the flood risk changes associated with Options 1 and 2.
EA1-003	Hydrology, Flood Risk and Drainage	Solution	Please present Figures 8 and 9 as water level difference maps, clearly identifying areas that are wet in the baseline but dry with the interventions in place, and vice versa.	The Applicant agrees. Figures 8 and 9 of the **Lime Down D Natural Flood Management Viability Report [EN010168/APP/9.66]** (Revision 2) have been updated as described in EA1-001.
EA1-004	Hydrology, Flood Risk and Drainage	Additional narrative/ explanation	Whilst it is acknowledged that the impacts from options 1 and 2 associated with the design event (1% Annual Exceedance Probability AEP plus 39% climate change) appear relatively small, it would be helpful if Figures 8 (option 1) and 9 (option 2) were presented as water level difference maps, clearly identifying areas that are wet in the baseline scenario but dry with	The Applicant agrees. The revised figures and accompanying text described in EA1-001 provide a clearer representation of the relatively small changes associated with Options 1 and 2 for the 1% AEP plus 39% climate change event.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		the interventions in place, and vice versa. This would provide a clearer representation of the changes resulting from the proposed measures.		
Document Reference(s): Lime Down D – Natural Flood Management Viability Report. August 2026. Revision 1 (REP5-109)				
EA1-005	Hydrology, Flood Risk and Drainage	Issue	The assessment does not demonstrate how the proposed interventions perform during more frequent flood events.	The Applicant agrees that assessment of a more frequent event would provide useful additional context on the potential performance of the NFM options. The **Lime Down D Natural Flood Management Viability Report [EN010168/APP/9.66]** (Revision 2) has therefore been updated for Deadline 7 to include modelling of the 3.3% AEP (1 in 30-year) event for Options 1 and 2, together with comparison mapping and additional discussion of the magnitude and extent of any resulting flood risk benefit. The additional assessment complements the existing 1% AEP plus 39% climate change assessment and provides further information on

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				how the proposed interventions perform during a lower magnitude, more frequently occurring event.
EA1-006	Hydrology, Flood Risk and Drainage	Impact	It is unclear whether the scheme provides measurable flood risk benefits under lower magnitude, more frequently occurring events	The Applicant notes the Environment Agency's comment. The additional 3.3% AEP assessment described in EA1-005 provides further information on the extent to which Options 1 and 2 provide measurable flood risk benefits during a more frequent event.
EA1-007	Hydrology, Flood Risk and Drainage	Solution	Please consider simulating a more frequent event, such as the 3.3% Annual Exceedance Probability (AEP) (1 in 30 year) event, and include additional discussion and comparison mapping of any resulting flood risk benefits within the report. Alternatively, provide justification for why the assessment of more frequent events is not considered necessary.	The Applicant agrees. The **Lime Down D Natural Flood Management Viability Report [EN010168/APP/9.66]** (Revision 2) has been updated as described in EA1-005 to include modelling of the 3.3% AEP event, comparison mapping and additional discussion of the resulting flood risk effects.
EA1-008	Hydrology, Flood Risk	Additional narrative/ explanation		The Applicant agrees. The additional 3.3% AEP assessment described in EA1-005 has been included to provide further clarity on the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	and Drainage	Whilst it is acknowledged that the impacts associated with the design event (1% AEP plus 39% climate change) appear relatively small, it would also be beneficial to assess a more frequent event, such as the 3.3% AEP (1 in 30 year) scenario, to clearly demonstrate any potential benefits under lower magnitude, more frequently occurring flood events.		performance of Options 1 and 2 during a lower magnitude, more frequently occurring flood event.
EA1-009	Hydrology, Flood Risk and Drainage	It is recognised that the A429 bridge acts as a hydraulic constriction within the system. However, additional evidence and discussion regarding the scheme's performance during more frequent flood events would provide further clarity on the magnitude and extent of any flood risk benefits.		The Applicant notes the Environment Agency's comment regarding the A429 bridge constraint. The additional 3.3% AEP modelling described in EA1-005 provides further information on the magnitude and extent of any flood risk benefit during a more frequent event, including the influence of the existing downstream hydraulic constraint.
Environmental Statement Volume 3 Appendix 11.6: Flood Risk Assessment and Outline Drainage Strategy – Lime Down D/BESS. August 2026. Revision 5				
Document Reference(s): Environmental Statement Volume 3 Appendix 11.6: Flood Risk Assessment (FRA) and Outline Drainage Strategy – Lime Down D/BESS. August 2026. Revision 5 (REP5-056)				
EA1-010	Hydrology, Flood Risk	Issue	The hydraulic model outputs presented within the FRA do not	The Applicant agrees. The **Flood Risk Assessment and Drainage Strategy for Lime Down D/BESS [EN010168/APP/6.3]** (Revision 6)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	and Drainage		appear to reflect the latest hydraulic modelling.	has been updated for Deadline 7 so that the flood mapping and associated assessment reflect the latest Gauze Brook hydraulic modelling presented in the **Lime Down D Hydraulic Modelling Report [REP5-096]**. The updated outputs are broadly consistent with the previous modelling in terms of overall flood extent, but updating the FRA ensures that the mapping and assessment are aligned with the latest hydraulic model.
EA1-011	Hydrology, Flood Risk and Drainage	Impact	It is unclear whether the predicted flood risk impacts to the proposed development have changed following the updated hydraulic modelling.	The Applicant notes the Environment Agency's comment. The **Flood Risk Assessment and Drainage Strategy for Lime Down D/BESS [EN010168/APP/6.3]** (Revision 6) has been updated as described in EA1-010 using the latest Gauze Brook model outputs, so that the assessment of flood risk to the proposed development is based on the latest modelling.
EA1-012	Hydrology, Flood Risk	Solution	Please update the mapping within the Lime Down D/BESS FRA to reflect the latest Gauze	The Applicant agrees. The mapping within the **Flood Risk Assessment and Drainage Strategy for Lime Down D/BESS [EN010168/APP/6.3]**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	and Drainage		Brook hydraulic modelling or provide justification for retaining the outputs from the previous Flood Modeller-TUFLOW model to inform the scheme design.	(Revision 6) has been updated to reflect the latest Gauze Brook hydraulic modelling, as described in EA1-010.
EA1-013	Hydrology, Flood Risk and Drainage	Additional narrative/ explanation It is appreciated that the model outputs are broadly similar in terms of flood extent. However, some clarification on the rationale for not updating the model results within the Lime Down D/BESS FRA would be helpful.		The Applicant agrees that the FRA should reflect the latest modelling. Although the previous and updated model outputs are broadly similar in terms of flood extent, the **Flood Risk Assessment and Drainage Strategy for Lime Down D/BESS [EN010168/APP/6.3]** (Revision 6) has been updated as described in EA1-010 so that the assessment and mapping are consistent with the **Lime Down D Hydraulic Modelling Report [REP5-096]**.
Lime Down D – Hydraulic Modelling Report. August 2026. Revision 2.(REP5-096)				
EA1-014	Hydrology, Flood Risk and Drainage	Lime Down D – Hydraulic Modelling Report	We have no comments on the updated Gauze Brook Hydraulic Modelling Report itself, which contains an appropriate level of detail. However, we are currently reviewing the hydraulic	The Applicant notes the Environment Agency's comments on the **Lime Down D Hydraulic Modelling Report [REP5-096]** and welcomes

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			model files and model construction and will provide any comments arising from that review to the applicant in due course.	confirmation that the report contains an appropriate level of detail. The Applicant will continue to engage with the Environment Agency in relation to its review of the hydraulic model files and model construction.
EA1-015	Hydrology, Flood Risk and Drainage	Lime Down D – Hydraulic Modelling Report	With regards to the hydrology, the applicant has provided a Flood Estimation Calculation Record in Appendix C of the updated model report. The hydrological assessment is considered reasonable. The Applicant has elected to adopt the more conservative Flood Estimation Handbook (FEH) statistical peak flow estimates in preference to those derived from ReFH2.	The Applicant welcomes the Environment Agency's confirmation that the hydrological assessment is reasonable. The Applicant also notes the Environment Agency's acknowledgement that the more conservative FEH Statistical Method peak flow estimates have been adopted within the **Lime Down D Hydraulic Modelling Report [REP5-096]**.
EA1-016	Hydrology, Flood Risk	Lime Down D – Hydraulic	A flow gauge is present on the Gauze Brook at Rodbourne, downstream of the study reach;	The Applicant notes the Environment Agency's comment regarding the Rodbourne gauge.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	and Drainage	Modelling Report	however, this dataset has not been incorporated into the assessment.	The gauge was not used directly in the design-flow estimation because, as noted by the Environment Agency, it is not classified by the NRFA as suitable for QMED estimation or pooling. The Gauze Brook catchment has therefore been treated as ungauged, with design peak flows derived using the FEH Statistical Method. The **Lime Down D Hydraulic Modelling Report [EN010168/APP/9.32]** (Revision 3) has been updated for Deadline 7 to include a brief discussion of the Rodbourne gauge dataset, its limitations and its potential value as a sense check on catchment response and hydrograph characteristics.
EA1-017	Hydrology, Flood Risk and Drainage	Lime Down D – Hydraulic Modelling Report	The Rodbourne gauge is not classified by the National River Flow Archive (NRFA) as suitable for estimation of the Median Annual Maximum flood (QMED)	The Applicant agrees. The limitations of the Rodbourne gauge mean that it is not appropriate for direct use in QMED estimation or pooling, but

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			or pooled analysis and therefore its exclusion is not considered unreasonable. Nevertheless, the dataset may have provided some value as a sense check of hydrograph shape and catchment response characteristics.	the dataset can provide contextual information on catchment response. The **Lime Down D Hydraulic Modelling Report [EN010168/APP/9.32]** (Revision 3) has been updated as described in EA1-016 to include this discussion.
EA1-018	Hydrology, Flood Risk and Drainage	Lime Down D – Hydraulic Modelling Report	The peak flows derived for the study catchment do not appear unreasonable when considered alongside recorded flows at Rodbourne, noting that the gauged catchment area is slightly larger.	The Applicant welcomes the Environment Agency's confirmation that the adopted peak flows do not appear unreasonable when considered alongside the recorded flows at Rodbourne. The comparison provides additional support for the design flows adopted within the **Lime Down D Hydraulic Modelling Report [REP5-096]**, while recognising the differences in catchment area and the limitations of the gauge dataset identified in EA1-016.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
EA1-019	Hydrology, Flood Risk and Drainage	Lime Down D – Hydraulic Modelling Report	The Applicant may wish to consider the following in relation to the hydrological assessment: 1. Whilst not considered fundamental to the conclusions of the assessment, it would be beneficial to include a brief discussion of the potential value and limitations of the Rodbourne gauge data, particularly in relation to ReFH2 parameter estimation and verification of hydrograph shape.	The Applicant agrees that the Rodbourne gauge provides useful contextual information notwithstanding its limitations. The **Lime Down D Hydraulic Modelling Report [EN010168/APP/9.32]** (Revision 3) has been updated for Deadline 7 to include a brief discussion of the potential value and limitations of the gauge data, including its use as a sense check on ReFH2 hydrograph characteristics and catchment response, as described in EA1-016.
Environmental Statement Volume 3 Appendix 11.4: Flood Risk Assessment and Outline Drainage Strategy – Lime Down C1. August 2026. Revision 5 (REP5-052)				
EA1-020	Hydrology, Flood Risk and Drainage	Flood Risk Assessment and Outline Drainage Strategy	No comments; although the applicant should note the Environment Agency's ask for a requirement in relation to the location of the substation within	The Applicant notes the Environment Agency's continued request for a separate flood mitigation Requirement. This matter was considered directly in the Applicant's response to FHW2.5 in the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Lime Down C1 (field C33) as shown below: *No development shall take place within Lime Down C1 until the location of the substation has been confirmed, an assessment of flood risk has been undertaken and a mitigation plan have been submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Environment Agency, and these works shall be carried out as approved.* *Note: Should the assessment show increased flood risk, the mitigation plan should include a Floodplain Compensation Scheme. Any proposed compensation scheme must demonstrate:*	**Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]**. The Applicant maintains that an additional Requirement is not necessary. Avoidance through micro-siting remains the preferred approach. The **Flood Risk Assessment and Drainage Strategy for Lime Down C1 [REP6-010]** confirms that the detailed design will seek to locate the substation outside the mapped surface water flow routes within Field C33. If the substation cannot be located wholly outside those flow routes, a site-specific flood risk assessment and, where required, proportionate hydraulic modelling will be undertaken at detailed design. This will demonstrate that the final layout maintains flood conveyance and storage and does not increase flood risk elsewhere. Any mitigation identified as necessary, which may include compensatory flood storage, localised

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			a) no net loss of floodplain storage within the design flood event; *b) compensation provided on a level-for-level and volume-for-volume basis where appropriate;* *c) no increase in flood risk elsewhere;* *d) implementation of compensatory storage prior to the associated floodplain loss; and* *e) appropriate maintenance of the compensation scheme is in place during the operation phase.*	level adjustments or other measures to maintain existing flow routes, will be incorporated into the detailed design. The detailed design is already subject to approval under Requirement 5 of the **Draft DCO [REP6-005]**. As set out in FHW2.5, the discharge of that Requirement requires the Applicant to demonstrate that the detailed design would not give rise to materially new or materially different environmental effects from those reported in the Environmental Statement, in accordance with Schedule 16. This provides the mechanism for the flood risk assessment and any necessary mitigation to be considered before the detailed design is approved. The Applicant therefore considers that the substantive flood risk controls sought by the Environment Agency are already secured through the existing DCO framework and that a separate

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				flood mitigation Requirement would duplicate those controls.

Table 3-2 Environment Agency – Appendix 2: Updated Comments and Position on the Issues Raised in the EA's Relevant Representation/Written Representation/Examination Responses Following Review of Documents Submitted at Deadline 5 [REP6-074]

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA001-EA011s summarise the issues below	See below	See below	N/A	N/A
EA-012	REP5-012 3.1 Draft Development Consent Order (Rev 5)	Disapplying Flood Risk Activity Permits	**Agree** We have now agreed in principle to the applicant's request to disapply the need for Flood Risk Activity Permits under the Environmental Permitting (England and Wales) Regulations 2016; based on the information in REP1-126 **9.10 ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule** and subject to the inclusion of our standard protective provisions in the Development Consent Order. Our standard protective provisions are now included in the draft Development	The Applicant welcomes the Environment Agency's confirmation that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
			Consent Order so we can agree this matter.	
EA-013	REP3-006 3.1 Draft Development Consent Order (Rev 3)	Requirement 13 Construction environmental management plan (CEMP)	Agreed- as per Deadline 4 response	The Applicant notes that this issue is agreed.
EA-014	REP3-006 3.1 Draft Developme nt Consent Order (Rev 3)	Requirement 14 Operational environmental management plan (OEMP)	Agreed as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-015	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 17 Soil Management	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-016	Fisheries	Fish species protection	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-017	Fisheries, Biodiversity and Geomorphology	Watercourse Crossings	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-018	Fisheries, Biodiversity and Geomorphology	Commitments register: mitigation	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-019	Fisheries, Biodiversity and Geomorphology	Ecological assessments	Agree- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-020	Fisheries, Biodiversity and Geomorphology	Aquatic invertebrates	Agree- As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-021	Fisheries, Biodiversity and Geomorphology	Watercourse buffers	Agree- As per Deadline 5 response	The Applicant notes that this issue is agreed.
EA-022	Water Framework Directive	Groundwater Bodies	Agree-as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-023	Groundwater and Contaminated Land	Piling	Agree-as per Deadline 4 response	The Applicant notes that this issue is agreed.
EA-024	Groundwater and Contaminated Land	Battery Energy Storage System (BESS) foundation solution	Agree- as per Deadline 4 response	The Applicant notes that this issue is agreed.
EA-025	Groundwater and	Fire water supply and storage within	Agree- as per Deadline 2 response	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
	Contaminated Land	the Outline Battery Safety Management Plan (oBSMP)		
EA-026	Groundwater and Contaminated Land	Ground infrastructure will be left in-situ following the decommissioning phase	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-027	Groundwater and Contaminated Land	Suitable mitigation where groundwater may be encountered.	Agree-as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-028	Groundwater and	Per- and polyfluoroalkyl substances (PFAS)	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
	Contaminated Land	based materials		
EA-029	Groundwater and Contaminated Land	Licensed groundwater abstractions	Agree-as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-030	Groundwater and Contaminated Land	Thermal implications of cables	Under discussion We are satisfied with the updates made to **Environmental Statement Chapter 19: Ground Conditions [REP5-026]**, specifically 19.10.2 (bullet 9), Paragraph 19.11.10 and Table 19-6. However, we had previously requested that a commitment to secure assessment of thermal impacts, and route the cables accordingly prior to construction be included in the Construction Environment Management Plan. Currently, there is no securing mechanism for the assessment of	The Applicant has indicated in Section 19.11.10 of **Environmental Statement, Volume 1, Chapter 19: Ground Conditions [REP5-026]** that assessment of thermal impacts will be undertaken in line with EA guidance on thermal impacts from cables (Risk assessments for buried electricity cabling, EA. Undated) supplied to the applicant on 27th February 2026. This includes a commitment in the **Outline Construction Environmental Management Plan [REP6-029]** Table 13 to undertake location-specific hydrogeological risk assessment and micro-route cable to minimise impacts to

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
			thermal impacts and micro-siting of the cable route.	SPZ and GWDTE. The Applicant would like to reiterate their commitment to ensuring that thermal impacts to groundwater from the scheme will be fully considered and where necessary, appropriately mitigated.
EA-031	Groundwater and Contaminated Land	The Battery Energy Storage System (BESS) Area drainage outfall automatically self-actuating valves	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-032	Groundwater and Contaminated Land	Ground conditions	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-033	Groundwater and	Discovery and	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
	Contaminated Land	Inspection Strategy		
EA-034	Groundwater and Contaminated Land	Inconsistency in the walkover surveys carried out.	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-035	Groundwater and Contaminated Land	Soil contamination during the operational phase.	Agree- as per Deadline 4 response	The Applicant notes that this issue is agreed.
EA-036	Groundwater and Contaminated Land	Groundwater risks have not been appropriately assessed.	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-037	Groundwater and Contaminated Land	Storage and management proposals for batteries have not	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
		been provided.		
EA-038	Groundwater and Contaminated Land	Mitigation proposals managing risks to groundwater have not been adequately addressed.	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-039	Groundwater and Contaminated Land	No Preliminary Risk Assessments (PRAs) for the interconnecting corridors between the main solar panel areas.	Agree- as per Deadline 4 response	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-040	Groundwater and Contaminated Land	Maps and data searches in appendices 19-1, 192 and 19-5 are not complete or specific to those sites	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-041	Groundwater and Contaminated Land	The PRA reports do not refer to the proposed Discovery and Inspection Strategy	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-042	Groundwater and Contaminated Land	PRA- offsite vehicle repair garage	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-043	Groundwater and Contaminated Land	Unclear whether ground investigation to confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-044	Groundwater and Contaminated Land	Justification for selecting the distances beyond which off site contamination sources would not be significant.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-045	Groundwater and Contaminated Land	Monks Park Mine	Agree- as per Deadline 4 response	The Applicant notes that this issue is agreed.
EA-046	Groundwater and Contaminated Land	No drainage strategies are provided for the proposed 400kV and 132kV Substations.	Agree-as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-047	Groundwater and Contaminated Land	Present the SuDS	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-048	Groundwater and Contaminated Land	Table 4: SuDS Mitigation Indices is blank.	Agree As per Deadline 4 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-049	Flood Risk Assessment	Functional Floodplain (Flood Zone 3b).	Agree The Applicant has included maps showing extents of the 3.3% (1 in 30) annual exceedance probability scenario. No land raising is within the functional floodplain, only small portions of panelled areas. The Applicant has assessed and confirmed that the impacts of this on flood flows and floodplain storage loss would not give rise to increases in flood risk elsewhere.	The Applicant welcomes the Environment Agency's confirmation that this matter is agreed. The Applicant notes the Environment Agency's agreement that the extent of the functional floodplain has been appropriately identified and assessed, and that the limited interaction of panelled areas with the 3.3% AEP flood extent would not result in an increase in flood risk elsewhere.
EA-050	Flood Risk Assessment	Fencing must not inhibit flood flow routes.	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-051	Flood Risk Assessment	No assessment of the impacts the	Agree – as per Deadline 5 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
		construction phase of the development will have on flood risk.		
EA-052	Flood Risk Assessment	It is not clear what freeboard allowances are proposed.	Agree – as per Deadline 5 response.	The Applicant notes that this issue is agreed.
EA-053	Flood Risk Assessment	Hydraulic model files for the Gauze Brook have not been reviewed.	Under Discussion The Applicant has submitted updated hydraulic model files and an updated hydraulic modelling report for the Gauze Brook. We have reviewed the updated modelling report and have no concerns regarding the modelling approach adopted or the methods used to calculate the design flood flows. However, we are currently reviewing the hydraulic model files themselves and will provide any further comments arising	The Applicant welcomes the Environment Agency's confirmation that it has no concerns regarding the modelling approach adopted or the methods used to derive the design flood flows. The Applicant notes that the Environment Agency's review of the hydraulic model files is ongoing and will continue to engage with the

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
			from that review to the applicant in due course.	Environment Agency on any comments arising from that review.
EA-054	Flood Risk Assessment	It is not clear how the analysis extent area of 275,000m2 has been derived.	Agreed. As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-055	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down D/BESS	Agree As per Deadline 5 response.	The Applicant notes that this issue is agreed.
EA-056	Flood Risk Assessment	It is not clear how the analysis	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
		extent area of 175,580m2 has been derived.		
EA-057	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down E2	Agree We have reviewed the hydraulic modelling for Lime Down E2 and consider it reasonable for assessing flood risk to the proposed development. The impacts of the solar panel support frames on flood risk elsewhere have been quantified using the detailed hydraulic modelling outputs. The resulting loss of floodplain storage associated with the support frames is considered negligible (less than 1 m^3) and is therefore not expected to result in an increase in flood risk elsewhere.	The Applicant welcomes the Environment Agency's confirmation that this matter is agreed. The Applicant notes the Environment Agency's conclusion that the hydraulic modelling for Lime Down E2 is reasonable for assessing flood risk to the proposed development, and that the quantified loss of floodplain storage associated with the solar panel support frames is negligible, at less than 1 m^3. The Applicant therefore agrees that this would not result in an increase in flood risk elsewhere.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-058	Outline Decommissioning Strategy	No clear commitment to the production of an outline or detailed Decommissioning Environmental Management Plan.	Agreed As per Deadline 2 response	The Applicant notes that this issue is agreed.
EA-059	Cable Route Construction Method Statement	Cable Route Construction Method Statement	Agree- As per Deadline 5 response.	The Applicant notes that this issue is agreed.
EA-060	Biodiversity Net Gain	Trading Rules	Agree As per Deadline 2 response	The Applicant notes that this issue is agreed.
EA-061	Biodiversity Net Gain	Full Biodiversity Net Gain Metric has	Agree- As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
		not been provided.		
EA-062	Outline Landscape and Ecological Management Plan	Planting strategy misses opportunities to enhance the environment.	Agree- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-063	Water Framework Directive Assessment	Change the description from "Supports Good" to "Not High" and possibly add an explanation	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-064	Water Framework Directive Assessment	The assessment does not identify or discuss	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
		Groundwater Dependent Terrestrial Ecosystems (GWDTEs)		
EA-065	Water Framework Directive Assessment	Subsurface infrastructure such as the Cable Corridor could impact the status of WFD Groundwater Bodies and should not be excluded from assessment.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-066	Outline Battery Safety	Provide details of the products to be used in	Agree As per Deadline 2 response	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
	Management Plan	the proposed liquid cooling systems, and the means by which it will be contained, captured and disposed.		
EA-067	Outline Battery Safety Manageme nt Plan	Provide more detail about the inspection and maintenance frequency and protocols for key controls at the BESS site.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-068	Outline Battery Safety	No details are provided of the proposed testing suite	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
	Management Plan	or sampling protocol for potentially contaminated firewater captured at the BESS in a fire event.		
EA-069	Outline Battery Safety Management Plan	It is not clear whether the proposed lining of the drainage system at the BESS would be impermeable.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-070	Outline Construction Environmental Management Plan	Water Quality Mitigation Measures are insufficient	Agree As per Deadline 4 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-071	Outline Site Waste Manageme nt Plan	No inclusion that waste will be assessed in accordance with Waste Technical Guidance WM3	Agree As per Deadline 2 response	The Applicant notes that this issue is agreed.
EA-072	Permitting	Permitting Informative	Agree	The Applicant notes that this issue is agreed.
EA-073	Flood Risk Assessment	Compensator y Flood Storage	Under Discussion. We welcome the proposal to site the Lime Down C1 substation outside mapped flood flow routes where practicable. However, we consider that there needs to be a separate flood compensation requirement as this relates to the overarching principles of the scheme. It must be ensured that development in Lime Down C1 cannot commence until the location of the	The Applicant notes the Environment Agency's continued request for a separate flood mitigation Requirement. This is the same matter addressed in EA1-020 and in the Applicant's response to FHW2.5 in the **Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]**. The Applicant maintains that an additional Requirement is not necessary.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
			substation has been confirmed, an assessment of flood risk has been undertaken and a mitigation plan have been submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Environment Agency and mitigation put in place to avoid flood risk to third parties. The requirement explicitly requires a formal submission, review, and written sign-off ("approved in writing") by the Local Planning Authority and the Environment Agency. The requirement provides a pre-commencement trigger which would ensure that development is halted in Lime Down C1 until it is satisfied. The mitigation proposed is unknown at this time. Flood Mitigation Requirement *No development shall take place within Lime Down C1 until the location of the substation has been confirmed, an assessment of flood risk has been*	The **Flood Risk Assessment and Drainage Strategy for Lime Down C1 [REP6-010]** confirms that the preferred approach is to locate the substation outside the mapped surface water flow routes within Field C33. If this cannot be achieved in full at detailed design, a site-specific flood risk assessment and, where necessary, proportionate hydraulic modelling will be undertaken to demonstrate that flood conveyance and storage are maintained and that flood risk is not increased elsewhere. Any mitigation identified through that assessment, including compensatory flood storage where required, would be incorporated into the detailed design.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
			undertaken and a mitigation plan have been submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Environment Agency, and these works shall be carried out as approved. *Note: Should the assessment show increased flood risk, the mitigation plan should include a Floodplain Compensation Scheme. Any proposed compensation scheme must demonstrate:* *a) no net loss of floodplain storage within the design flood event;* *b) compensation provided on a level-forlevel and volume-for-volume basis where appropriate;* *c) no increase in flood risk elsewhere;* *d) implementation of compensatory storage prior to the associated floodplain loss; and*	As set out in FHW2.5, the detailed design is already subject to approval under Requirement 5 of the **Draft DCO [REP6-005]** and must demonstrate that it would not give rise to materially new or materially different environmental effects from those reported in the Environmental Statement. The Applicant therefore considers that the substantive controls sought by the Environment Agency are already secured through the existing DCO framework and that a separate flood mitigation Requirement would duplicate those controls. This is also consistent with the agreed project position that no additional flood-risk Requirement should be introduced at this stage.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
			e) appropriate maintenance of the compensation scheme is in place during the operation phase.	
EA-074	Outline Landscape and Ecological Management	Herbicide Use	Agreed- as per Deadline 4 response	The Applicant notes that this issue is agreed.
EA-075	Outline Ecological Protection and Mitigation Strategy	Improvements to Document	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-076	Firewater Drainage	Detail of fire water management. A standalone drainage plan is strongly recommended.	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-077	BESS and Substation Drainage	Proposed drainage layout for the BESS and 400kv Substation development.	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-078	Lime Down E Desk Study	former RAF airfield at Hullavingto n.	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-079	outline Battery Safety Management Plan	Battery replacements	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-080	Intrusive Ground Investigations	Intrusive Ground Investigations	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-081	Decommissio ning	Decommissio ning of cables	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-082	Ground Investigations	Purpose, scope and extent of ground investigations	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-083	Battery Safety Management Plan	Manual isolation of BESS systems	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-084	Battery Safety Management Plan	Battery storage infrastructure should not be delivered to site before all firewater containment arrangements are installed and commissioned.	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-085	Battery Safety Management Plan	Emergency Response Plan	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-086	Foundation Design	Piling Risk Assessment references	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-087	Commitments Register	Horizontal Directional Drilling	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-088	Commitments Register	Siting of construction compounds and stockpiles	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-089	Commitments Register	Plant maintenance	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-090	Commitments Register	Breakout contingency procedures	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
EA-091	Commitments Register	Per- and polyfluoroalkyl substances (PFAS)	Agree- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-092	Commitments Register	BESS and substation drainage infrastructure	Agree- As per Deadline 2 response	The Applicant notes that this issue is agreed.
EA-093	Commitments Register	Hydrologic al risk assessment	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA Written Rep (WR) REP1-151 ID Ref in REP2-039	**Issue**	**Topic (s)**	**Environment Agency Updated Position following Deadline 5 submissions**	**Applicant's Response**
EA001-EA011s summarise the issues below	See below	See below	N/A	N/A

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
WR EA-001	Ecology and Biodiversity	Biodiversity Net Gain	**Agree**	The Applicant notes that this issue is agreed.
WR EA-002	Draft DCO	"Substantially in accordance with" requirements	**Under Discussion** We maintain our previous position set out in our **written representation REP1-151**	The Applicant maintains its position as set out in its response to WR EA-002 in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**. In summary, the use of "substantially in accordance with" is standard drafting for DCO Requirements and is appropriate in the context of this Scheme. It provides the necessary flexibility to accommodate detailed design development within the Rochdale Envelope whilst securing the relevant mitigation measures through the requirement for each detailed plan to be submitted to and approved by the relevant planning authority, in consultation with the Environment Agency as appropriate, before the relevant works may commence or be carried out, and the requirement for

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
				those plans to be implemented as approved. The Applicant does not consider that this wording undermines the enforceability of the relevant Requirements.
WR EA-003	Draft DCO Soil Management	Requirement 17	**Agree**	The Applicant notes that this issue is agreed.
WR EA-004	Draft DCO	Procedure for Discharge of Requirements	**Agree** We note the applicant's explanation that we will be notified on the day of consultation. Ideally we would have the 15 working day consultation period specified in the DCO but we recognise we would have this time to consider applications so can agree this matter.	The Applicant notes that this issue is agreed.
WREA-005	Water Quality	Foul Drainage	**Agree** -as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WREA-006	Water Quality	Water Quality Monitoring	**Agree-** as per Deadline 4 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
WREA-007	Water Quality	Vehicle washdown and refuelling areas	**Agree** -as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WREA-008	Water Quality	Concrete management	**Agree-** as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WREA-009	Water Quality	Sediment control and SuDS	**Agree-** as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WREA-010	Water Quality	Fuels, oils and chemical storage	**Agree-** as per Deadline 4 response.	The Applicant notes that this issue is agreed.
WREA-011	Water Quality	Wheel wash water disposal	**Agree-** as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WREA-012	Water Quality	Outline Decommissioning Strategy	**Agree-** as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WREA-013	Water Quality	Watercourse buffers	**Agree** - as per Deadline 3 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
WREA-014	Water Quality	Horizontal Directional Drilling (HDD) and Per- and polyfluoroalkyl substances (PFAS)	**Agree-** as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WREA-015	Statement of Common Ground	Statement of Common Ground	**Under Discussion** The next version of the Statement of Common Ground will be submitted at Deadline 6.	The Applicant confirms that the revised **Statement of Common Ground with Environment Agency [REP6-047]** was submitted at Deadline 6.

Table 3-3 Environment Agency – Issues Raised as Part of Deadline 4 Response [REP6-074]

EA Deadline 4 response REP4-097	Issue	Topic	Environment Agency Updated Position following Deadline 5 submissions	Applicant's Response
Action 25	Cable Route Corridor	Species surveys	**Agree** We have reviewed the **Outline Environmental Protection Management Strategy (REP5-082)** and the applicant has updated the timing of pre commencement inspections in paragraph 10.3.2 so the inspection will be carried out two months in advance of works commencing by a suitably qualified ecologist, which we agree to.	The Applicant notes that this issue is agreed
Action 25	Fisheries	Outline Construction Environmental Management Plan	**Agree** We have reviewed the **Outline Construction Environmental Management Plan (REP-072)** and the requested commitment has been included.	The Applicant notes that this issue is agreed

3.2 National Highways

Table 3-4 National Highways – Comments on Responses to the Examining Authority's Second Written Questions and Requests for Information (ExQ2) [REP6-078]

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
NH-001	**1 Introduction** **1.1** This is a response by National Highways Limited ("NH") to the Applicant's Responses to the Examining Authority's second written questions and requests for information (ExQ2) issued on Monday 27 July 2026 [REP5-097]. NH does not respond separately to the Applicant's Response to Submissions Received at Deadline 4 [REP-098] as the latest position is addressed in NH's Response to Examining Authority's second written questions and requests for information (ExQ2), the responses below and the updated Statement of Common Ground which NH understands will also be submitted at Deadline 6.				The Applicant notes this comment.
DC02.2	The Applicant	**Article 2 – Interpretation Q1** National Highways [REP4-098] has requested that a definition of relevant highway authority is required to be included in the dDCO. The	Article 2 already includes the requested definition, with article 2(1) providing: *"highway" and "highway authority" have*	NH is content that this addresses its request.	The Applicant notes this comment.

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		Applicant is asked to include such a definition or explain why it is not necessary	*the same meaning as in the 1980 Act;* The term "relevant" is not defined as its meaning is readily understood.		
DCO2.15	The Applicant	**Multiple Requirements – National Highways** National Highways [REP4-098] has reiterated its concern that it is not named a consultee in Requirement 3, whilst also maintaining that it must be added as a consultee to	National Highways is the statutory undertaker responsible for the strategic road network – a series of motorways and major A-roads that are the most heavily used part of the national highway network.	As per NH's response to ExQ2 NH is happy with the suggest approach. This just leaves the additions that NH have requested to Requirement 3 and 5 in its response to ExQ DCO2.1 [REP5-127].	The Applicant welcomes confirmation that National Highways is content with the approach taken in respect of Requirements 7 to 20. With regard to Requirements 3 and 5, the Applicant refers National Highways to its response to DCO2.15 in the **Applicant's Response to the Examining Authority's Second Written Questions [REP5-097].**

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		Requirements 5, 7, 8, 10, 11, 13, 14, 15, 16 and 20 to protect its position. The ExA seeks to understand from the applicant what issues would arise from acquiescing to National	National Highways operates under licence, issued by the Department for Transport. The core function of National Highways, as set out in the licence, is the operation and management of the strategic road network. The Scheme is a nationally significant infrastructure project with only limited interactions with the strategic road network. The		The Applicant does not consider it proportionate to add National Highways as a named consultee in Requirement 3 (*Approved details and amendments to them*) or Requirement 5 (*Detailed design approval*), as neither Requirement concerns matters that fall within National Highways' remit in respect of the SRN. The detailed design approval under Requirement 5 relates to the layout, scale, appearance and access arrangements for the on-site works, which do not directly engage National Highways' statutory functions. Similarly, Requirement 3 concerns the mechanism for amending approved documents, which is a general planning process matter.

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
			interactions with the strategic road network are limited to the use of the SRN by construction traffic and the crossing of the SRN by the cable route corridor. Proportionate consultation and oversight for these aspects are provided for by the DCO. As a relevant highway authority, National Highways will be consulted under Requirement 15 (construction		

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
			traffic management plan). The cable crossing is subject to the protective provisions for National Highways included in Part 5 of Schedule 15 to the draft DCO [REP4-004]. As relevant highway authority, National Highways will also be consulted in respect of decommissioning under Requirement 20. The **Outline Construction**		

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
			Environmental Management Plan (CEMP) [REP4-049] makes further targeted provision for National Highways to be consulted on fencing, drainage, and dust creation, as well as any changes or amendments to an approved CEMP that have effect within 10 metres (or otherwise in the vicinity of) the SRN. As a result of ongoing discussions with		

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
			National Highways, the Applicant has also amended the **Outline Operational Environmental Management Plan [EN010168/APP/7.13] (Revision 6) and the Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] (Revision 5)** submitted at Deadline 5 to include an obligation to consult with		

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
			National Highways where activities are proposed within close proximity or adjacent to the SRN or that could have an impact on the SRN. The proportionate approach set out above ensures that National Highways is fully consulted on all matters under the Requirements that could impact the SRN, and the level of consultation is therefore consistent with National		

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
			Highways' remit under its licence.		
DCO2.27	The Applicant National Highways	**Protected Provisions for National Highways** In response to ISH4 Action Point 9 [REP4-087] the applicant provided a summary of negotiations with statutory undertakers on protected provisions. The ExA notes the applicant's statement that it is confident that protected provisions with National Highways will be agreed prior to the	National Highways requested an additional amendment to the protective provisions on 3 August 2026 together with some amendments to the outline management plans. The Applicant has responded and is awaiting final confirmation that the protective provisions and side agreement are now agreed.	The ExA has NH's response to this question in [REP5-127] and does not comment further.	The Applicant notes this comment.

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		close of the examination. However, National Highways in its deadline 4 submission [REP4-098] states that whilst National Highways is content in principle with the protected provisions and Side Agreement reflecting the position agreed at Green Hill, National Highways has made it clear to the Applicant that there are scheme specifics that need to be agreed before NH is in a position to formally agree the PP's.	The Applicant remains confident that agreement will be reached prior to the close of the Examination.		

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		Following NH's in principal approval, progress with the Applicant on requirements has been minimal (ref NH-007). Notwithstanding ExQ2 DCO2.15 and DCO2.23 above, the ExA would welcome an honest and realistic position from the applicant and National Highways on the likelihood of agreeing protected provisions for Lime Down before the anticipated close of this examination on 21 October 2026, particularly noting			

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		the absence of any updates to the SoCG since deadline 2 [REP-030].			
EB2.18	The Applicant Wiltshire Council	**Trenchless Techniques – Protection of Root Systems and Soil Structure** National Highways response to ExQ1 NH-008 [REP4-098] refers to concerns regarding the depth of trenchless techniques and the potential to damage root systems and/ or soil structure with respect to trees reference N/TP07. National Highways	The main risks to soil structure from cable installation are compaction by machinery and disruption due to excavation and reinstatement. With the trenchless system, these risks are largely confined to launch and reception pit areas only and the extent of disturbance to soil structures is	National Highways note Wiltshire Council's comments on this issue (response to ExQ2 EB2.18) [page 29 of [REP5-112]) that the information currently presented does not fully demonstrate that unacceptable impacts on retained and / or protected trees would be avoided in all locations across the Order Limits.	The Applicant notes this comment. Text to this effect has been added to the **Outline AMS [EN010168/APP.6.3]** (Revision 3) and submitted at Deadline 7. The detailed AMS will be produced following detailed design and its production is secured in the **Outline CEMP [REP6-029]**.

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		remains unconvinced by the details of the applicant's approach and therefore considers these trees should form part of Schedule 12 of the DCO. **The Applicant:** You are requested to address National Highways' concerns regarding the proposed use of trenchless techniques in the vicinity of trees N/TP07. Please identify: • the proposed minimum depths and offsets from	therefore much less compared with open trench installation. The trenchless system is anticipated to install cables at up to 2m depth where the material is most likely to either be structureless clay or limestone rock, the structures of which would not be adversely affected. As stated in Table 4 of the Outline CEMP [REP4-049], HDD will be utilized to avoid damaging roots,	Wiltshire Council have requested: "the detailed design to consider the category of tree to ensure that there is no removal of any Category A tree to facilitate the HDD. A clear methodology for dealing with inadvertent drilling returns, bore collapse, settlement or other construction anomalies that may affect root protection areas is required. The Applicant should provide detailed trenchless crossing drawings showing entry and exit points, horizontal and vertical offsets from the Root	

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		root protection areas • the assessment undertaken to demonstrate that roots and soil structure will not be adversely affected • the management documents in which these controls would be secured • whether any amendments to dDCO Article 41, Schedule 12, or relevant management plans are proposed to address National Highways' concerns.	maintaining a minimum depth of 1m to bypass the majority of roots, which typically exist in the upper 600mm of soil. All machinery used for trenchless solutions (e.g. HDD) will be situated outside the RPAs of retained trees. Entry and exit points for the trenchless solutions will be sited more than 15m from retained tree stems. Trenchless	Protection Area (RPA), and tree-specific assessments where trenchless techniques are proposed within or immediately adjacent to RPAs of Category A, Veteran, or Ancient trees, and protected trees subject to TPOs, thereby demonstrating that there will be no significant loss of rooting volume, and there is no unacceptable risk of soil fracturing, heave, settlement or desiccation affecting the structural rooting environment." National Highways endorse this request and require clarity on	

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		Wiltshire Council: Although trees N/TP07 are located on National Highways land, please provide your professional opinion on whether the applicant has demonstrated that the proposed trenchless techniques generally across the Order limits would avoid unacceptable impacts on tree root systems and soil structure. If not, please specify: • what additional information is required	solution depths will exceed 1m under RPAs. Throughout construction, movement of machinery and storage of materials will be managed to prevent encroachment into RPAs. In the event that access is required, temporary ground protection will be employed to safeguard the tree roots.	how this is to be secured. National Highways would want to be consulted on the details submitted where this relates to N/TPO7.	

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		• whether additional mitigation or controls should be secured • the mechanism by which such controls should be secured • any revised drafting considered to be necessary to the dDCO.	The above measures are included within **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**, and apply to N/TP07. The Contractor is to comply with the measures set out in the Arboricultural Method Statement. A detailed Arboricultural Method		

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
			Statement, based on post-DCO detailed design, will be produced prior to construction commencing and will be included within the detailed CEMP.		
TT2.4	The Applicant	**Outline Construction Traffic Management Plan Q2** **Question:** ExQ1 TT1.11 asked National Highways to clarify whether deliveries to the proposed development through junctions 17	**Applicant's Response:** The Applicant makes note of this comment. The travel times between junction 17 and 18 and the scheme are all within 30 minutes travel time. Therefore, vehicles arriving	NH is content that no update is required to the Outline CTMP	The Applicant notes this comment.

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		and 18 should take place after 09:30 and before 16:30 on weekdays (or some other times)? In its response [REP3-151], National Highways stated that due to existing levels of congestion, it is expected that no construction traffic would pass through junctions 17 and 18 of the M4 during the weekday morning (08:00-09:00) and evening (17:00-18:00) peak hours, therefore vehicles should not pass through these junctions until after 09:30 and before	09:30 or departing at 16:30 will avoid travelling through junctions 17 and 18 of the M4 during the identified weekday morning (08:00-09:00) and evening (17:00-18:00) peak hours. **The Statement of Common Ground with National Highways [REP2-030]** set out an agreed position on the proposed construction hours set out in		

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		16:30 on weekdays. This would logically mean that vehicles would be arriving on site later than 09:30 depending on the travel time from the M4 to the various site access points. The Applicant is requested to review its oCTMP, particularly paragraphs 3.2.6 and section 3.4 to explicitly include the National Highways' requirement in relation to HGVs, as well as advise on any implications this may have on the construction timetable and the	the Outline CTMP and the timing restrictions to avoid peak traffic periods, which would mean that deliveries could use the junction before 09:30 but outside of the AM (08:00-09:00) and PM (17:00-18:00) peak hours. On this basis, the **Outline CTMP [REP4-057]** remains unchanged on this matter.		

EXQ2 / Reference	Respondent	Question:	Applicant's Response to ExQ2	Response to Question on behalf of National Highways	Applicant's Response
		construction traffic flows on the local construction route network if these strict times to avoid junctions 17 and 18 are imposed.			

3.3 NHS Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board

Table 3-5 NHS Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board – Public Health, Wellbeing and Health Service Capacity Concerns [REP6-079]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
BSWICB-001	Scheme Description and DCO Process	Introduction	NHS Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (BSW ICB) recognises the important contribution that renewable energy infrastructure will make towards achieving national net zero ambitions and supporting the transition to a lower-carbon economy. We therefore support the development of renewable energy infrastructure in principle.	The Applicant notes NHS BSW ICB's comments and has responded in full below [BSWICB-002 to BSWICB-039] below.
BSWICB-002	Human Health	Health and Wellbeing Impacts	However, whilst welcoming investment in renewable energy, the ICB has significant concerns regarding the scale of the proposed Lime Down Solar Park development and the adequacy of the assessment of its potential impacts on population health, wellbeing, health inequalities, community resilience and local health and care services. Having reviewed the applicant's Human Health Assessment and associated supporting	The Applicant is confident that the assessment of health and wellbeing impacts in **ES Volume 1, Chapter 18: Human Health [APP-070]** and its supporting documents provide a robust and proportionate assessment of likely significant effects to health as a result of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			documentation, we are not persuaded that the potential health implications of a development of this scale, extent and duration have been fully understood, sufficiently evidenced or appropriately mitigated.	The Applicant considers local health baseline conditions, the likely impacts from the Scheme, and the appropriate level of mitigation measures have all been provided and set out in full. In response to **Action points arising from ISH8 [EV14-010]**, the Applicant has provided a **Position Statement [EN010168/EXAM/9.90]** which provides the updated positions of the Applicant, BSW ICB, and Wiltshire Council's Public Health team since the ICB's representations were published. The Applicant has responded to these matters in more detail in [BSWICB-003 to BSWICB-034] below.
BSWICB-003	Human Health	Health and Wellbeing Impacts	Whilst this representation is submitted in response to the current consultation on proposed changes to the Development Consent Order application, the concerns raised by NHS Bath and North East Somerset, Swindon and Wiltshire	The Applicant welcomes ICB's involvement in this DCO examination, and is confident that the Applicant's submitted documents give due consideration to cumulative health, wellbeing, health inequality and health

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Integrated Care Board relate principally to the cumulative health, wellbeing, health inequality and health service impacts of the Lime Down Solar Park development as a whole. The ICB considers that these matters remain material to the Examination of the Development Consent Order application and should be considered by the Examining Authority when assessing both the proposed changes and the overall scheme. The ICB's comments are therefore intended to inform the Examination of the full development, including its scale, geographical extent, operational lifespan and the cumulative implications for population health, community resilience, mental wellbeing and future demand upon health and care services.	service impacts as has been identified by the ICB. Since these representations were made, the Applicant has met with the ICB and Wiltshire Council's Public Health team to ensure the positions of each party was fully understood. This meeting was held on 25th September and was used to draft the **Position Statement [EN010168/EXAM/9.90]** between the three parties, submitted at Deadline 7. The Applicant used this meeting to explain that it made contact with the ICB as a prescribed consultee at EIA Scoping in July 2024, by the Applicant's Human Health technical lead in September 2024 during non-statutory consultation, then again at Section 42 Statutory Consultation in January 2025. Finally, the ICB was invited to register as an Interested Party to make Relevant

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Representations following submission of the DCO Application in September 2025. At no point were means of communication by email or post acknowledged or responded to, with these comments at Deadline 6 the first made by any representative of the ICB towards this Scheme. The ICB's representative at the meeting was not aware of previous communication attempts, but did confirm that the correct contact channels were used by the Applicant.
BSWICB-004	Human Health	Comprehensive Public Health Impact Assessment	Comprehensive Public Health Impact Assessment The ICB formally requests that a comprehensive and independently reviewed Public Health Impact Assessment (HIA) be undertaken and afforded significant weight within the Examination process.	The Applicant maintains that a standalone, independently reviewed Health Impact Assessment (HIA) is neither necessary nor justified, as the potential public health implications of the Scheme have already been exhaustively assessed and secured within the Environmental Statement (ES). **ES Volume 1, Chapter 18: Human Health**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				[APP-070] provides a comprehensive and proportionate, population-level assessment of the Scheme's potential effects on physical and mental health and wellbeing. Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, the request for an additional independently reviewed Public HIA is no longer being pursued by the ICB, and for that reason has not been included in the **Position Statement between The Applicant Wiltshire Council Public Health and NHS BSW ICB [EN010168/EXAM/9.90]**. Resultantly, this matter is considered to be resolved.
BSWICB-005	Human Health	Comprehensive Public Health Impact Assessment	Whilst the applicant has undertaken a Human Health Assessment, the assessment itself identifies a range of potential adverse impacts relating to mental wellbeing, physical activity, social connectivity, community identity, sense of place, access to healthcare services	The Applicant confirms that the assessment within **ES Volume 1, Chapter 18: Human Health [APP-070]** identifies adverse effects to health and wellbeing, but no significant adverse effects. This is as a result of the Scheme design and mitigation measures secured

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			and wider determinants of health, whilst concluding that most effects are minor or negligible. The ICB is concerned that insufficient evidence has been provided to demonstrate that the cumulative impacts of these effects over the lifetime of the development have been robustly examined.	by the relevant Requirements in Schedule 2 to the **Draft DCO [REP6-005]**. The Applicant has built this assessment on evidence provided through: its baseline conditions assessment to identify key health profiles, vulnerable groups, and inequalities in the local population; and the assessment of physical health impacts derived from the assessment of transport safety, air quality, noise and vibration, flood risk, ground contamination, and public access across the rest of the Environmental Statement. The likely impacts on health and wellbeing have been assessed against industry guidance and considered through informed professional judgement built on experience from previous assessments of this nature being undertaken by the Applicant team.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-006	Human Health	Comprehensive Public Health Impact Assessment	The ICB would expect a more comprehensive assessment to specifically address: Mental health and psychological wellbeing. • Physical activity and preventative health benefits. • Health inequalities and impacts on vulnerable groups. • Community resilience and social cohesion. • Access to green space and recreational assets. • Long-term implications for neighbourhood health. • Future demand pressures on health and care services.	Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**. The Applicant is confident that the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** provides a comprehensive and proportionate, population-level assessment of the Scheme's likely significant effects on physical and mental health and wellbeing, and covers all matters raised by the ICB: • The assessment covers both physical and mental health and wellbeing aspects of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• Cumulative impacts arising over the 60-year operational life of the scheme. Mental Health and Wellbeing	assessed determinants of health scoped in; • Health inequalities and vulnerable groups have been identified and made fundamental to the assessment of receptor sensitivity to changes from the Scheme; • Community resilience, social cohesion, access to green space and recreation, and demand for healthcare have all been directly considered through the assessed determinants of health scoped in; and • Long-term health implications, and the long-term operational effects of the Scheme over its entire lifetime have been assessed for the assessed determinants of health scoped in.
BSWICB-007	Human Health	Comprehensive Public Health Impact Assessment	The ICB's principal concern relates to mental health and wellbeing.	The Applicant confirms that the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** provides a comprehensive and proportionate, population-level assessment of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			The Applicant's assessment recognises that the development may affect: • Mental wellbeing. • The mental health benefits associated with recreation and physical activity. • Social connectivity. • Community identity. • Community resilience. • Sense of place. • Feelings of influence and control over the local environment.	Scheme's likely significant effects on mental health and wellbeing through the scoped determinants of health assessed, as has been identified by the ICB. The Applicant has not however identified any significant adverse effects to these receptors. This is as a result of the Scheme design and mitigation measures secured by the relevant Requirements in Schedule 2 to the **Draft DCO [REP6-005]**. The Applicant furthermore has shown its commitment to mitigation of mental health and community impacts through the provision of a Community Liaison Group to ensure communities are kept well informed and can, where there is opportunity to practicably do so, influence details of construction measures.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant confirms that the provision of the Community Liaison Group as mitigation for community wellbeing impacts was a central item in the meeting on 25 September between Wiltshire Council, the ICB and the Applicant. The parties are broadly aligned on the provision of the CLG and have agreed to continue discussions to ensure terms of reference and the practical application of the CLG can be agreed as early as practicable. The position of each party on this matter is therefore set out in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-008	Human Health	Comprehensive Public Health Impact Assessment	The area affected by the proposal currently provides significant opportunities for walking, cycling, running, horse riding and informal recreation. The Applicant identifies an extensive network of public rights of way and recreational routes that contribute to physical activity, social interaction,	The Applicant notes this comment and confirms it has assessed the impacts of the Scheme on recreation. This has been done both in respect to the use of recreational facilities and routes in **ES Chapter 16: Socio-**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			access to nature and psychological wellbeing.	**Economics, Tourism and Recreation [APP-068]** and its supporting documents, and in respect of changes to the physical and mental health benefits associated with those recreational facilities and routes in **ES Volume 1, Chapter 18: Human Health [APP-070]**.
BSWICB-009	Human Health	Comprehensive Public Health Impact Assessment	The ICB is concerned that insufficient consideration has been given to: • The cumulative psychological effects of large-scale and long-term landscape change. • Loss or perceived loss of valued countryside and tranquil environments. • Reduced enjoyment of recreational and outdoor activities. • Community anxiety associated with prolonged uncertainty and opposition to the scheme. • Potential effects on residents already living with mental health conditions. • The impact on older people, carers and those vulnerable to social isolation who	The Applicant is confident that the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** provides a comprehensive and proportionate, population-level assessment of the matters raised by the ICB: • The geographic and temporal scale of the Scheme have been included in consideration of landscape changes, and the effect this will have on community identify and culture, connection to the landscape, and perceptions of changes to tranquillity. This is covered across both **ES Volume 1, Chapter 18: Human Health [APP-070]** and **Chapter 8:**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			rely upon local environments to maintain wellbeing.	**Landscape and Visual [REP6B-004]**; • Enjoyment of recreational and outdoor activities has been assessed both in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **Chapter 18: Human Health [APP-070]**; • Community anxiety and opposition has been considered in respect of the Scheme from construction to decommissioning in **ES Volume 1, Chapter 18: Human Health [APP-070]**, matters during the DCO process and pre-construction are currently under discussion with Wiltshire Council's Public Health team (see **Statement of Common Ground [REP6-045]**) to ensure mitigation is secured in the most appropriate way for this period; and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				• People with existing mental health conditions, and persons vulnerable to social isolation have been considered as vulnerable groups in the assessment, and the extent to which they are present in the Study Area is reflected in the designation of population sensitivity to impacts from the Scheme in **ES Volume 1, Chapter 18: Human Health [APP-070]** The LVIA in **Chapter 8: Landscape and Visual [REP6B-004]** acknowledges that there are some significant landscape and visual effects as a result of the Lime Down Scheme especially during the Construction Phase. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). There are six primary reasons for this, as set out below:

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				1. Dispersed nature of the Sites The Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each Site, supporting overall assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements, road infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety, and the solar panels will be distributed 'in and amongst' the landscape features to assimilate them into the landscape. **2. Nature of Scheme being 'overlaid' and reversible** For example, developments for mineral extraction fundamentally change the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				nature of the landscape in which they operate, whereas solar projects, with the exception of occasional structural footprints, are 'overlaid' on the landscape. This allows the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. **3. Strong framework of existing vegetation**: The strong framework of existing vegetation means that this would provide the structure for the Scheme to sit comfortably within and not become intrusive within the landscape. The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the array and helps integration into the receiving landscape, particularly in views towards the horizon.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				4. The benefits of mitigation: By Year 15, new planting would be established and help to mitigate adverse effects. Please refer to the LVIA specifically Table 8.10 which sets out the Planting Typologies utilised within the Landscape and Ecology Mitigation Plans and Table 8.18 of the **LVIA [REP6B-004]** which sets out the quantity of landscape enhancements the Scheme would provide: • Proposed Ground Cover: 702.80 ha • Green Corridor & Woodland Planting: 11.45 • Enhanced Riparian Native Planting: 7.78 ha • Hedgerow Reinforcement & Reinforced Roadside Reinforcement: 54.94 km • Proposed Hedgerows:15.49 km • Reintroduction of Historic Ponds and New Ponds: 14

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				5. Biodiversity Net Gain In following the mitigation hierarchy, the Scheme would deliver significant areas of mitigation that would enhance the natural environment by providing net gains for biodiversity. This would deliver additional landscape structure and connections to wider ecological networks as well as contributing positively to the quality of the landscape, far exceeding minimum biodiversity net gain requirements.
BSWICB-010	Human Health	Comprehensive Public Health Impact Assessment	Whilst the applicant concludes that impacts are largely minor or negligible, the ICB does not believe that sufficient evidence has been presented to support that conclusion.	The Applicant confirms that the assessment within **ES Volume 1, Chapter 18: Human Health [APP-070]** identifies that there are no greater than minor adverse effects to assessed health and wellbeing receptors at any phase of the Scheme, and finds no significant adverse effects are likely to occur.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				This is as a result of the Scheme design and mitigation measures secured by the relevant Requirements in Schedule 2 to the **Draft DCO [RPE6-005]**. Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-011	Human Health	Existing Mental Health Vulnerabilities	The Applicant's own baseline assessment identifies existing mental health vulnerabilities within the affected population.	The Applicant confirms that baseline health vulnerabilities and inequalities have been identified in Section 18.7 of **ES Volume 1, Chapter 18: Human Health [APP-070]**. These have therefore directly been used to determine the sensitivity of the population, and vulnerable population sub-groups to the assessed impacts from the Scheme.
BSWICB-012	Human Health	Existing Mental Health Vulnerabilities	The Human Health Assessment records that: • The wider study area experiences significantly higher rates of emergency	The Applicant confirms that baseline health vulnerabilities in respect of mental health and associated risk-taking behaviour have been identified in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			hospital admissions relating to intentional self-harm than the national average. • The population within the immediate study area also performs worse than national benchmark rates for self-harm admissions. • The assessment itself identifies this as being indicative of greater instances of poorer mental health and associated risk-taking behaviour within parts of the population.	Section 18.7 of **ES Volume 1, Chapter 18: Human Health [APP-070]**. These have therefore directly been used to determine the sensitivity of the population, and vulnerable population sub-groups to the assessed impacts from the Scheme. The Applicant confirms that every receptor with respect to mental health impacts was designated medium or high sensitivity, reflecting the higher instances of poorer mental health and associated risk-taking behaviour in the existing population. Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-013	Human Health	Existing Mental Health Vulnerabilities	The ICB considers this evidence highly relevant. Where existing vulnerabilities are already present, there should be a	The Applicant confirms that this matter has been given due consideration in the assessment in **ES Volume 1, Chapter**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			particularly robust assessment of whether a development of this scale could further impact upon mental wellbeing and community resilience.	**18: Human Health [APP-070]**. As such, the Applicant is confident in the robustness of this matter being suitably addressed. Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-014	Human Health	Prevention and Wider Determinants of Health	The NHS has a statutory responsibility to improve population health and reduce health inequalities. Prevention and early intervention are fundamental priorities for both the NHS and Wiltshire's Joint Health and Wellbeing Strategy.	The Applicant notes this comment, is aware of these responsibilities, and has demonstrated its understanding of the statutory, policy, and guidance surrounding health assessment in Section 18.3 of **ES Volume 1, Chapter 18: Human Health [APP-070]** and the supporting Section 1.2 of **ES Volume 3, Appendix 18-2: Human Health Legislation, Policy, Guidance, and Supporting Information [APP-245]**. Together with the assessment outcomes demonstrating no significant adverse

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				effects to health and wellbeing are anticipated have sought to show how the Scheme will not significantly interfere with the priorities of both the NHS and Wiltshire JHWS.
BSWICB-015	Human Health	Prevention and Wider Determinants of Health	The Applicant's assessment acknowledges potential impacts on: • Physical activity. • Recreation. • Community connectivity. • Access to open space. • Enjoyment of the countryside. • The health benefits associated with the natural environment. These factors are important contributors to the prevention of: • Anxiety and depression. • Social isolation and loneliness. • Obesity. • Cardiovascular disease.	The Applicant confirm these matters are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]** and has demonstrated its understanding of the pathways between the Scheme's likely significant effects and the health factors and receptors that they are anticipated to influence.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• Diabetes and other long-term health conditions associated with physical inactivity.	
BSWICB-016	Human Health	Prevention and Wider Determinants of Health	The ICB is concerned that insufficient weight has been given to the preventative health value of the existing environment and whether those benefits may be diminished over the lifespan of the proposed development.	The Applicant considers that appropriate weight has been given to the value of the environment and access to the countryside for recreation-driven health benefits. As such, the impacts of the Scheme have been assessed both in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **Chapter 18: Human Health [APP-070]**. The Applicant has also committed to ensuring that these benefits can be maintained throughout the operational lifetime of the Scheme through the implementation of offsets from PRoWs in the Scheme design, the provision of areas of landscape and ecological enhancement planting, including along PRoWs to improve user experience, and the provision of permissive paths to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				improve the level of physical access to the countryside. These measures are secured through the **Design Principles and Parameters [REP4-043]**, the **Outline Landscape and Ecological Management Plan [REP6-037]** and the **Outline Public Right of Way and Permissive Paths Management Plan [REP1-104]** by Requirements 5, 7, and 16 of Schedule 2 to the **Draft DCO [REP6-005]**. Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved subject to full review of mitigation measures as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-017	Human Health	Neighbourhood Health, Community Resilience and Place	The NHS is increasingly focused on neighbourhood-based models of care, recognising that health outcomes are shaped not only by healthcare services but by the social, environmental and	The Applicant notes this comment and confirms that it too recognises the value of social, environmental and community assets to health outcomes, and has ensured that this has been considered in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			community assets available to local people.	the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]**.
BSWICB-018	Human Health	Neighbourhood Health, Community Resilience and Place	National policy increasingly emphasises prevention, social connection, community resilience, reduction of inequalities and enabling people to remain healthy within their own communities.	The Applicant notes this comment. The Applicant does not consider that the Scheme has any significant adverse effect that would conflict with these national policy aims.
BSWICB-019	Human Health	Neighbourhood Health, Community Resilience and Place	The Applicant's own assessment recognises the importance of: • Community identity. • Community resilience. • Social connectivity. • Access to countryside and recreational routes. • Sense of place. • Community influence and engagement.	The Applicant confirm these matters are recognised, and duly assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**.
BSWICB-020	Human Health	Neighbourhood Health, Community	The ICB is concerned that insufficient consideration has been given to the extent to which the development may affect the community assets and	The Applicant is confident that the assessment of health and wellbeing impacts in **ES Volume 1, Chapter 18: Human Health [APP-070]** and its

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Resilience and Place	environmental factors that support neighbourhood health.	supporting documents provide a robust and proportionate assessment of likely significant effects to health as a result of the Scheme, including on community and environmental assets that contribute towards positive health outcomes at a local level. Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-021	Human Health	Neighbourhood Health, Community Resilience and Place	The surrounding area currently functions as an important resource for walking, cycling, horse riding, recreation, social interaction and connection with nature. These assets support healthier lifestyles, stronger communities and reduced demand upon health and care services.	The Applicant notes this comment and confirms it has assessed the impacts of the Scheme on recreation. This has been done both in respect to the use of recreational facilities and routes in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and its supporting documents, and in respect of changes to the physical and mental health benefits

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				associated with those recreational facilities and routes in **ES Volume 1, Chapter 18: Human Health [APP-070]**.
BSWICB-022	Human Health	Neighbourhood Health, Community Resilience and Place	Whilst the applicant concludes these impacts are likely to be minor or negligible, the ICB considers that the cumulative effect on community wellbeing, social cohesion, neighbourhood resilience and population mental health over the lifetime of the development requires further examination.	The Applicant is confident that the assessment of health and wellbeing impacts in **ES Volume 1, Chapter 18: Human Health [APP-070]** provides a robust and proportionate assessment of likely significant effects on the matters raised by the ICB. The Applicant understands that where multiple health effects may impact upon population groups, there is possibility for there to be cumulative or 'in-combination' effects. As no significant adverse effects have been determined for any individual receptor, the Applicant considers that it is unlikely that there would be any additional significant cumulative or in-combination effect on health and wellbeing, at any phase or collectively across the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-023	Human Health	Health Inequalities and Vulnerable Groups	The Applicant's methodology acknowledges the need to consider impacts upon vulnerable groups including older people, people with disabilities, individuals with mental health conditions, carers, socially isolated individuals and rural communities with barriers to accessing services.	The Applicant confirms that vulnerable groups have been identified in respect of each health receptor in the assessment, and the extent to which they are present in the Study Area is reflected in the designation of population sensitivity to impacts from the Scheme in **ES Volume 1, Chapter 18: Human Health [APP-070]**.
BSWICB-024	Human Health	Health Inequalities and Vulnerable Groups	The ICB is not convinced that the assessment adequately evaluates whether these groups may experience disproportionate adverse impacts.	The Applicant is confident that the assessment of health and wellbeing impacts in **ES Volume 1, Chapter 18: Human Health [APP-070]** and its supporting documents, provides a robust and proportionate assessment of likely significant effects to health as a result of the Scheme. The assessment appropriately identifies vulnerable population groups and where there is

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the potential for disproportionate impacts to be experienced by those vulnerable groups. That notwithstanding, no significant adverse effects are anticipated to any vulnerable groups at any phase of the Scheme. Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-025	Human Health	Health Inequalities and Vulnerable Groups	This is particularly important given the Health and Care Act 2022 focus on reducing inequalities and the obligations arising from the Equality Act 2010.	The Applicant has provided the assessment, informed by the Health and Care Act 2022, in **ES Volume 1, Chapter 18: Human Health [APP-070]** to demonstrate that significant adverse effects to health have been avoided or can be suitably mitigated. As such, the Applicant does not consider that the Scheme undermines the ICB's ability to meet the objectives of the Health and Care Act 2022, nor

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				undermine the Secretary of State's (as decision-maker for the DCO) obligations under the Equality Act 2010. Full details of the legislation, policy, and guidance of relevance to the assessment of human health in full in **ES Volume 3, Appendix 18-2: Human Health Legislation, Policy and Guidance [APP-245]** and supported in **ES Volume 1, Chapter 5: Energy Need, Legislative Context and Energy Policy [APP-057]**.
BSWICB-026	Human Health	Impact on Health and Care Services	The Applicant identifies health and social care services as a relevant health receptor and acknowledges the potential for increased pressure on local healthcare provision.	The Applicant confirms that "Health and Social Care Services" have been assessed as a specific health receptor in **ES Volume 1, Chapter 18: Human Health [APP-070]** for construction and decommissioning, as confirmed in response to reference 3.14.2 in the **Scoping Opinion adopted by the Secretary of State on 22 August 2024**.
BSWICB-027	Human Health	Impact on Health and	The ICB is particularly concerned that the applicant's conclusions regarding	The Applicant has used current GP workforce data in **ES Volume 1,**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Care Services	health service capacity appear to rely predominantly on a review of current GP workforce ratios and assumptions regarding the distribution of temporary worker registrations.	**Chapter 18: Human Health [APP-070]** to understand baseline conditions for healthcare provision and access to the existing population ahead of construction of the Scheme. This is therefore used to determine the extent to which additional temporary workers may put additional pressures on access to primary healthcare. The comparison of GP workforce to patient ratios is also given to determine the sensitivity of health and social care services to change, in its comparative capacity to cope with increased demand, either from the existing population requiring greater treatment, or as a result of temporarily increased patient registration. Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-028	Human Health	Impact on Health and Care Services	Whilst this provides a snapshot of current provision, it does not adequately reflect the significant housing growth and population expansion planned across North Wiltshire over the coming decades, nor the increasing healthcare needs associated with an ageing population and rising prevalence of long-term health conditions.	The Applicant confirms that the assessment of baseline conditions for health service provision is used to assess construction effects, and qualitatively assess decommissioning effects (given this is likely to be in the 2080s-2090s, there is no quantitative measure for assessing healthcare provision at that time). Due to the passive nature of the Scheme, the Applicant does not consider that significant effects to health service provision are likely to occur during the Scheme's operational lifetime, either from increased demand from residents impacted by the Scheme, nor due to increased patient registration associated with the Scheme. The Applicant acknowledges that housing growth, population growth, and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				indeed population demography changes will all affect healthcare, however this is a matter independent of the Scheme and would occur regardless of whether the Scheme is consented or not. This is acknowledged by the Applicant in **ES Volume 1, Chapter 18: Human Health [APP-070]** which identifies the future population baseline as likely to be older, and this have greater healthcare needs than present.
BSWICB-029	Human Health	Impact on Health and Care Services	The Applicant's own assessment acknowledges that the local population is expected to age significantly over the operational lifetime of the scheme, bringing increased demand for health and care services.	The Applicant confirms this is considered in **ES Volume 1, Chapter 18: Human Health [APP-070]**.
BSWICB-030	Human Health	Impact on Health and Care Services	The ICB does not consider that sufficient account has been taken of future demand pressures on: • Primary care services. • Community health services.	The Applicant is confident that the assessment of health and wellbeing impacts in **ES Volume 1, Chapter 18: Human Health [APP-070]** provides a robust and proportionate assessment of likely significant effects to primary,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• Mental health services. • Social care services. • Wider health and care infrastructure.	community and mental healthcare services, social care services, and wider health and care infrastructure. The assessment suitably accounts for future baseline conditions (given the level of information that can reasonably be predicted) through the determination that population groups are likely to be of greater sensitivity to changes in health and social care service provision at the point of decommissioning (2089-91), compared to during construction (2027-29). Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-031	Human Health	Impact on Health and Care Services	Furthermore, the assessment appears to focus principally on direct healthcare provision rather than considering the wider system consequences arising	The Applicant confirms that it has used current GP workforce data in **ES Volume 1, Chapter 18: Human Health [APP-070]** to understand baseline

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			from changes to wellbeing, physical activity, community connectedness and mental health. Demand upon NHS services is influenced not only by population numbers but by the strength of the wider determinants of health. The ICB considers that these factors have not been sufficiently examined in combination.	conditions for healthcare provision and access to the existing population ahead of construction of the Scheme. This is used to determine the extent to which additional temporary workers may put additional pressures on access to primary healthcare. As no further significant adverse effects to the existing population are anticipated during construction, it is not considered likely therefore that there would be significant changes in demand to healthcare services from the existing population as a result of the Scheme. Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-032	Human Health	Community Identity, Sense of	The Applicant acknowledges that nearby communities may experience impacts	The Applicant confirms that "*Community Identity, Culture, Resilience and Influence*" have been assessed as a

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Place and Long-Term Cumulative Impact	relating to community identity, culture, sense of place, resilience and influence.	specific health receptor in **ES Volume 1, Chapter 18: Human Health [APP-070]** for the construction, operation and decommissioning phases of the Scheme.
BSWICB-033	Human Health	Community Identity, Sense of Place and Long-Term Cumulative Impact	The ICB considers these factors to be particularly important within rural communities where connection to landscape, heritage, recreation and community networks forms an important component of individual and collective wellbeing.	The Applicant confirms it understands this, hence it has designated communities in more rural parts of the assessed 2 km Study Area to be of a medium sensitivity to changes in their surroundings, connections to landscape and heritage, and community cohesion. By comparison, more urban or suburban areas have been considered low sensitivity. This is set out, and how engagement around the application for DCO consent for the Scheme is likely to shape community sensitivity in Section 18.7 and 18.10 in **ES Volume 1, Chapter 18: Human Health [APP-070]**.
BSWICB-034	Human Health	Community Identity,	Given the proposed operational lifespan of approximately 60 years, the ICB	The Applicant is confident that the assessment of health and wellbeing

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Sense of Place and Long-Term Cumulative Impact	remains concerned that cumulative impacts over time have not been sufficiently assessed, particularly in relation to mental wellbeing, social cohesion and community resilience.	impacts in Section 18.10 of **ES Volume 1, Chapter 18: Human Health [APP-070]** provides a robust and proportionate assessment of likely significant effects over the entire lifetime of the Scheme. Therefore, the Applicant considers that it has suitably assessed impacts in relation to long-term mental wellbeing, social cohesion and community resilience over the entirety of the 60-year operational lifetime of the Scheme. Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-035	Human Health	Conclusion	BSW ICB supports the principle of renewable energy generation and recognises the importance of achieving national decarbonisation objectives.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
BSWICB-036	Human Health	Conclusion	However, we remain concerned that the applicant's own evidence identifies potential impacts upon mental wellbeing, recreation, physical activity, social connectivity, community identity, access to health services and wider determinants of health, whilst concluding that these impacts are largely non-significant without sufficient evidence to support those conclusions.	The Applicant confirms that while some adverse effects to health and wellbeing have been identified in **ES Volume 1, Chapter 18: Human Health [APP-070]**, these have been determined not to be significant to any receptor or at any phase of the Scheme. The Applicant respectfully disagrees with the ICB's position that the assessment is not sufficiently evidenced, and points to the evidence base throughout the Environmental Statement upon which the health assessment is built, and has been directly referred to within **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant is therefore confident that the assessment of health and wellbeing impacts undertaken has been robust and proportionate.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Since these representations were made, the Applicant has met with the ICB and Wiltshire Council's Public Health team to ensure the positions of each party were fully understood. This meeting was held on 25th September and was used to draft the **Position Statement [EN010168/EXAM/9.90]** between the three parties, submitted at Deadline 7.This confirms that this matter is resolved between the parties.
BSWICB-037	Human Health	Conclusion	In particular, the ICB is concerned that: • Existing mental health vulnerabilities within affected communities may not have been adequately considered. • The cumulative impacts on mental wellbeing, recreation, social connectivity and community resilience may be understated. • Future healthcare demand arising from significant housing growth, population expansion, demographic change and increasing service pressures has not been fully examined.	The Applicant has responded to each of the concerns raised in its responses to 'BSWICB-003' to 'BSWICB-034' above. The Applicant is confident that the assessment of health and wellbeing impacts in **ES Volume 1, Chapter 18: Human Health [APP-070]** and its supporting documents provide a robust and proportionate assessment of likely significant effects to health as a result of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• The implications for prevention, neighbourhood health and wider determinants of health have not been afforded sufficient weight. • The impacts on vulnerable populations and health inequalities require further assessment.	The Applicant further does not consider that the Scheme interferes with the ICB's ability to carry out its own obligations with regard to providing healthcare to future increased population resulting from new housing growth, nor the priorities of the NHS (nationally), the ICB and Wiltshire JHWS to improve preventative and neighbourhood level care.
BSWICB-038	Human Health	Conclusion	The ICB therefore requests that a comprehensive Public Health Impact Assessment be undertaken and independently reviewed before any final determination is made, with specific consideration given to mental health, prevention, neighbourhood health, health inequalities, community resilience and the long-term implications for local health and care services.	The Applicant maintains that a standalone, independently reviewed Health Impact Assessment (HIA) is neither necessary nor justified, as the potential public health implications of the Scheme have already been exhaustively assessed and secured within the Environmental Statement (ES). **ES Volume 1, Chapter 18: Human Health [APP-070]** provides a comprehensive and proportionate, population-level assessment of the Scheme's potential effects on physical and mental health and wellbeing.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Following the meeting on 25 September between Wiltshire Council, the ICB and the Applicant, this matter is resolved as stated in the **Position Statement [EN010168/EXAM/9.90]**.
BSWICB-039	Human Health	Conclusion	The ICB considers these matters material to the Examination of the Development Consent Order application as a whole and believes further evidence is required before a robust conclusion regarding the health impacts of the proposed development can be reached. The ICB requests that the Examining Authority gives appropriate weight to these concerns as representations from the statutory NHS organisation responsible for commissioning healthcare services, improving population health and reducing health inequalities across Bath and North East Somerset, Swindon and Wiltshire.	While the Applicant welcomes BSW ICB's late engagement, introducing an additional, non-statutory layer of independent public health review at this stage of the Examination would duplicate the rigorous assessments already undertaken by competent technical experts and validated by statutory consultees including UK Health Security Agency (UKHSA) **[REP6-080]**. The Applicant notes that it actively sought to engage with BSW ICB and other regional NHS service providers at key stages of the pre-application and DCO submission process, as detailed at 'BSWICB-003' above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Since these representations were made, the Applicant is grateful that it has had the opportunity to meet with the ICB and Wiltshire Council's Public Health team to ensure the positions of each party was fully understood. This meeting was held on 25th September and was used to draft the **Position Statement [EN010168/EXAM/9.90]** between the three parties, submitted at Deadline 7. This confirms that the matters raised in the ICB's Deadline 6 representations are resolved between the parties or will be subject to ongoing collaboration.

3.4 Stop Lime Down

Table 3-6 Stop Lime Down – Introduction [REP6-081]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-001	Scheme Description and DCO Process	Introduction	1.1.1. This document and the attached papers comprise Stop Lime Down's (SLD('s)) Deadline 6 submission. This document will address: • Comments on any submissions received at Deadline 5; • Comments on the responses to the ExA's second written questions ("ExQ2") 1.1.2. This written submission uses the document reference for the tracked version of documents where multiple versions of the document exist in the Document Library. 1.1.3. This document does not provide any comments from SLD's traffic expert, Mr. Bruce Bamber, as Mr. Bamber is currently on annual leave. As mentioned in SLD's Deadline 5 submissions, SLD	The Applicant notes Stop Lime Down's comment and has responded in full below [SLD-002-SLD-297].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			proposes to submit delayed comments from Mr. Bamber on or before 7 September 2026. SLD apologises for the delay in submitting these comments, and would respectfully request and welcome the ExA accepting SLD's traffic and transport submissions from Mr. Bamber late so that his evidence is accepted in the Examination and available to the parties at least a week in advance of the reserved weeks for hearings. SLD recognises that, if accepted, this would be an exceptional step. 1.1.4. SLD welcome any questions that the ExA or any other party (including the Applicant) may have about this submission. SLD will continue to take steps to assist the ExA and advance its case throughout the remainder of the Examination.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			1.1.5. This submission has not been produced with the use of AI. 1.1.6. The following appendices are attached to this submission: A - Landscape Comments on Deadline 5 Submissions B - University of Derby Comments on the Applicant's Updated Climate Papers	

Table 3-7 Stop Lime Down – Comments on Deadline 5 Submissions [REP6-081]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-003	Landscape and Visual	Landscape	2.1.1. Comments from SLD's landscape expert, Ms. Carly Tinkler, have been included at the end of this document as Appendix A.	The Applicant notes this comment and has responded to Appendix A below.
SLD-004	Ecology and Biodiversity	Ecology and Biodiversity	2.2.1. For the avoidance of doubt, SLD does not repeat points here which it has already made in response to answers to ExQ2.	The Applicant notes this comment and welcomes the concise approach taken on issues already raised.
SLD-005	Ecology and Biodiversity	REP5-098 – Applicant's Response to Submissions Received at Deadline 4	REP5-098 – Applicant's Response to Submissions Received at Deadline 4 2.2.2. RT-002: The Applicant has explained that individual hedgerow has been identified which will be removed within the Cable Route Corridor, although detailed locations for proposed crossings within the listed hedgerow is not known at this stage. SLD query on what basis the Applicant is satisfied those crossings will be usable. Equally while the Applicant explains that the oEPMS is "*designed to minimise*	The Applicant notes Stop Lime Down's comment and refers to previous responses provided to Wiltshire Council's Relevant Representations regarding the application of the Rochdale Envelope in relation to ecology and biodiversity in the **Applicant's Response to Relevant Representations (Part 1) [PDA-009]**. The Applicant maintains that the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** assesses the realistic

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			potential adverse impacts on sensitive receptors, including ecological features such as protected and notable species" – without such detailed information, it is unclear how the Applicant be satisfied that such impacts will be avoided.	worst-case effects on all ecological receptors, including hedgerows and protected and notable species therein, and that the avoidance and mitigation measures presented within the **Outline Ecological Protection and Mitigation Strategy [REP6-039]** have been designed to sufficiently mitigate potential adverse impacts on sensitive receptors based on the worst-case scenario assessment presented in **ES Chapter 9 [REP4-010].**
SLD-006	Ecology and Biodiversity	REP5-098 – Applicant's Response to Submissions Received at Deadline 4	2.2.3. SLD1-045: The Applicant responds to SLD's concern that weather can have a significant impact on the effectiveness of pre-clearance searches. The Applicant explains that potential issues such as seasonality and inclement weather conditions are to be taken into account by the EcoCoW's experience, delaying until weather conditions improve if required.	The Applicant notes Stop Lime Down's comment.
SLD-007	Ecology and Biodiversity	REP5-098 – Applicant's Response to	2.2.4. However, while an experienced EcoCoW is more likely to find species, this would not address cases where	The Applicant notes Stop Lime Down's comment and maintains the position set out in the response to **SLD1-045 in the**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Submissions Received at Deadline 4	weather or seasonality removes or obscures the features and signs of activity you would use to confirm species presence. Mr. Valori is further sceptical that an EcoCow would realistically delay works when weather conditions are suboptimal, the work crew is present but otherwise no signs of fauna activity are found.	**Applicant's Response to Submissions Received at Deadline 4 [REP5-098].** The Applicant does not agree that the presence of work crews or programme pressures would override ecological requirements. Ecological supervision would be undertaken in accordance with the relevant method statements and measures set out in the **Outline EPMS [REP6-039]** and protected species legislation, and the EcoCoW would have the authority to advise that works should not proceed where there is a risk of non-compliance with these requirements. The Applicant is therefore satisfied that the proposed EcoCoW-led approach provides a robust mechanism for managing ecological risks associated with changing site conditions, including those arising from weather and seasonality.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-008	Ecology and Biodiversity	REP5-098 – Applicant's Response to Submissions Received at Deadline 4	2.2.5. While these limitations are part of the normal, accepted realities of preclearance searches, they are of particular importance here given the extent of the Applicant's mitigation strategy which hinges on them being effective. In many cases, the Applicant's pre-clearances will be the only real inspection for a number of species, including dormouse, and the only real data informing the eventual mitigation and cable route within each microsite. If the data from a single visit is susceptible to weather conditions, then the subsequent ad-hoc mitigation approach advised will be similarly flawed, and risk of a legal breach will be much higher than if the Applicant had allowed for more time to carry out a proper nest tube or track search.	The Applicant notes Stop Lime Down's comment and maintains the position set out in the response to SLD1-045 in the **Applicant's Response to Submissions Received at Deadline 4 [REP5-098]**, and in the relevant responses to Stop Lime Down's comments in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060**]. The Applicant maintains that the avoidance and mitigation measures set out within the **Outline Ecological Protection and Mitigation Strategy [REP6-039]** minimise as far as reasonably practicable, the potential for impacts on protected species and any associated risk of non-compliance with relevant wildlife legislation.
SLD-009	Ecology and Biodiversity	REP5-080 – Outline Landscape and	2.2.6. At §1.4.4 the Applicant explains that an indicative schedule of monitoring at the Solar PV Sites would comprise UKHab Survey and Botanical quadrats	The Applicant notes Stop Lime Down's comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Ecological Management Plan	undertaken in Years 1, 2, 3, and 5 post-construction, and then every five years for the lifetime of the Scheme. However, the Applicant clarifies that breeding bird surveys and any additional species-specific surveys are likely to be undertaken "*less frequently to monitor changes in the longer time, with visits anticipated to be undertaken every 5 years*."	
SLD-010	Ecology and Biodiversity	REP5-080 – Outline Landscape and Ecological Management Plan	2.2.7. Mr. Valori queries this distinction and the justification for conducting surveys in respect of breeding birds with less regularity, given that loss of nesting habitat has been identified by the Applicant as a major long-term ecological impact of the proposal. Adaptive management has been highlighted as a potential tool to ensure impacts are at least in part mitigated, with set-aside fields enhanced accordingly. Given the need to confirm that these enhancements and management measures are being implemented and working effectively as	The Applicant notes Stop Lime Down's comment and refers to the previous response provided to SLD1-182 in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060].**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			intended in the initial years, and the already stated commitment to monitoring vegetation throughout Y1, Y2, Y3 and Y5, Mr. Valori questions why a similar monitoring frequency is not proposed for birds in the initial five-year cycle.	
SLD-011	Ecology and Biodiversity	REP5-080 – Outline Landscape and Ecological Management Plan	2.2.8. In respect of grassland habitat, SLD notes that the Applicant proposes for grassland management to include grazing by sheep during Year 1 following a haycut between late July and September (§1.3.98). It is anticipated that low intensity grazing "may be employed" throughout the year within all areas of the Sites where panel arrays are proposed (§§1.3.105-1.3.108), and every three years where tussock grassland is being managed.	The Applicant notes Stop Lime Down's comment and clarifies that sheep grazing is not proposed within Year 1 post-construction, as set out within the **Outline Landscape and Ecological Management Plan (LEMP) [REP6-037]**. Grassland within the Scheme will be managed via cutting during Year 1. The Applicant confirms that, with respect to grazing, whilst the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** has assumed grazing will not be undertaken and grassland management at the Solar PV Sites has been assumed to comprise mechanical cutting, the option of sheep grazing will be explored,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				should consent be granted. Management prescriptions relating to sheep grazing have therefore been provided in the **Outline LEMP [REP6-037].**
SLD-012	Ecology and Biodiversity	REP5-080 – Outline Landscape and Ecological Management Plan	2.2.9. As explained within SLD's LVIR [REP1-170], there are many problems associated with keeping and managing animals within solar arrays at scale and only a few examples of commercial solar sites in the UK which have been or are currently being grazed by sheep or other animals. At the ISH and in response to ExA questions, the Applicant has explained that it considers mitigation would still be effective in the absence of grazing. SLD seeks clarity as to what will occur in respect of habitat management where grazing is not a practical or viable option.	The Applicant notes Stop Lime Down's comment and maintains that sheep grazing is widely applied method for management of grassland within operational solar farms. Solar Habitat, a yearly publication since 2023 by Solar Energy UK in collaboration with Lancaster University, Wychwood Biodiversity, and Clarkson and Woods, presents results of ecological monitoring of solar farms across the UK. Of the 67 operational solar farms monitored in 2026 where management was noted, 40% implemented sheep grazing as part of grassland management. Management prescriptions for both sheep grazing and mechanical cutting of grassland within the Scheme are presented within the **Outline**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Landscape and Ecological Management Plan (LEMP) [REP6-037], and the Applicant maintains that both potential methods will result in the successful delivery of proposed habitats across the Scheme.
SLD-013	Hydrology, Flood Risk and Drainage	REP5-030 to REP5-036 - Figures 11-1 to 11-7 Fluvial and Surface Water Flood Maps	2.3.1. The flood maps have been updated by adding in what appears to be a scale plan of the solar panel rows. The flood risk maps incorporate EA maps showing both surface water flooding and fluvial flooding. The latter is only calculated where the catchment areas are large enough – in other parts of the site, surface water flooding has to stand proxy for fluvial flood risk. On the Area C1 map [REP5-032], the surface water flooding extent has been completely omitted from the panel areas. There are also omissions in parts of the Area A map [REP5-030]. These omissions give a misleading impression of surface water flood risk and should be corrected.	The Applicant accepts that parts of the surface water flood layer are obscured in Figures 11-1 and 11-3 following the addition of the indicative Solar PV Panel layout. This is a cartographic presentation issue only. The underlying Environment Agency NaFRA2 / Risk of Flooding from Surface Water data were used in the assessment and have not been omitted from the site-specific Flood Risk Assessments or drainage assessment. The affected figures have therefore been corrected for submission at

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Deadline 7, and the wider figure suite has been checked for the same issue. The Applicant does not accept SLD's suggestion that this affects the adequacy of the flood-risk assessment. The correction does not alter the underlying baseline flood extents, the assessment conclusions or the mitigation required for the Scheme.
SLD-014	Hydrology, Flood Risk and Drainage	REP5-030 to REP5-036 - Figures 11-1 to 11-7 Fluvial and Surface Water Flood Maps	2.3.2. Additions to the maps requested by the ExA have provided some valuable insights into how well the solar panel areas are connected to the drainage network, both in the form of dug ditches (though not all of these are shown) and flow paths which show up as connected areas on the Risk of Flooding from Surface Water (RoFSW) maps incorporated in the Flood Map for Planning, which form connected pathways at times of high flow:	The Applicant agrees that the revised figures assist in understanding the relationship between the indicative Solar PV Panel layout and the existing drainage environment. The Applicant does not, however, agree that proximity to an existing ditch, watercourse or overland flow route demonstrates adverse hydraulic connectivity created by the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• Ditches intercept overland flow routes from the panels in many places (e.g. Fields A9, B6, B7, B11, C7, C34, C14, C15, D1, D2, D3, D4, D5, D6, D7, D8, D11, D19, D20, D21, D22, D23, D24, E2, E3, E11, E17, E20, E21, E24, E31, E32, E33, E34); • Fields containing RoSWF areas include A2, A6, A7, C7, C14, C19, C21, C22, E4, E12, E33 and E34; • Fields close to RoSWF channels include A2, A6, A7, A9, A10, C7, C19, C21, C22, E2, E3, E4, E14, E15, E17, E18, E19, E33 and E34; • Fields close to ordinary watercourses or main rivers include A10, B10, C22, D8, D11, D12, D13, D14, D16, E4, E12, E13, E14, E19, E20, E21, E23, E24, E25, E26, E27 and E34; • Panels are located in areas at risk of fluvial flooding in Flood Zones 2 or 3 in Fields D12, D13, D14, D17, E22, E24 and E26;	Those features form part of the existing drainage environment. The flood figures are strategic flood-risk figures and are not intended to constitute an exhaustive inventory of every minor agricultural ditch or ephemeral drainage feature. The hydrology assessment has used Environment Agency datasets, LiDAR and topographic information, surface water flood mapping and site-specific assessment to identify relevant drainage features and flow pathways. The Environment Agency was previously advised that the available datasets had been reassessed for this purpose and that minor ephemeral features, where not individually represented, would nevertheless generally be represented within the surface water mapping as flow routes.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Importantly, that hydrological evidence base is supplemented by the ecology survey and assessment work. Watercourses, ditches and other sensitive boundary features have been identified and assessed for ecological value and sensitivity and recorded through **ES Volume 3, Appendix 9-8: Confidential Schedule of Protective Ecological Buffers [APP-205]**. Those assessments inform the feature-specific buffers secured through the **Outline EPMS [REP6-039]**. A minimum 8 m buffer applies from ditches and watercourses, with wider buffers applied where ecological value or other sensitivity requires them.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Environment Agency has confirmed its acceptance of the minimum 8 m approach following review of the ecological buffer information. In addition, **ES Volume 3, Appendix 9-9: Watercourse Crossing Schedule [REP3-122]** and **Watercourse Crossing Schedule [REP3-139]** identify and characterise proposed crossing locations, including relevant habitat information and crossing methodology. Where a minor or ephemeral feature is not individually represented on a strategic flood figure, its hydraulic function may therefore still be represented by the underlying topography and mapped surface water flow route and separately addressed

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				through the ecological and watercourse-crossing assessments. The absence of an individual minor ditch from a particular flood figure does not therefore mean that the feature has been disregarded in the assessment or Scheme design. The relevant flood-risk question is whether the Scheme materially changes runoff generation or routing, rather than whether the existing agricultural landscape already contains drainage connectivity. That distinction is addressed in the Applicant's response to SLD-015.
SLD-015	Hydrology, Flood Risk and Drainage	REP5-030 to REP5-036 - Figures 11-1 to 11-7 Fluvial and Surface Water Flood Maps	2.3.3. The maps thus show that most of the panel areas are well-connected to the existing drainage network, which implies that the areas with enhanced runoff as demonstrated in [REP5-130] Appendix D are likely to transmit the excess water to the river system reasonably quickly. The drainage	The Applicant does not agree that the conclusion drawn by SLD follows from the updated figures. The figures identify existing drainage pathways. They do not demonstrate that the Scheme will generate additional runoff at the field boundary, alter the timing of runoff

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			ditches and overland flowpaths flow into the ephemeral stream network and from there into the four permanent streams that drain into the Avon – the Rodbourne Brook, Gauze Brook, Norton Brook and the un-named stream entering the Avon upstream of Whatley Manor. The fluvial and surface water flood maps thus provide evidence that flood risk is likely to increase off site due to the Scheme, though they do not allow it to be quantified.	reaching a watercourse or increase downstream flood peaks. In source-pathway-receptor terms, the existence of a ditch or overland flow route establishes a potential pathway. It does not establish an increase in the source term. SLD's inference requires two further propositions to be demonstrated: first, that local redistribution of rainfall at Solar PV Panel edges generates additional field-scale runoff; and second, that any such additional runoff reaches the receiving watercourse with sufficient magnitude and timing to produce a material change in the downstream hydrograph. The flood maps demonstrate neither. The submitted Flood Risk Assessments and Drainage Strategies recognise that Solar PV Panels can redistribute rainfall

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				locally, including at drip lines. Panelled areas nevertheless remain permeable and are not connected to a sealed drainage network. Whether locally redistributed rainfall becomes connected runoff is governed principally by vegetation cover, soil condition and compaction, surface roughness, erosion and rilling, slope and hydrological connectivity. Those factors are controlled through the **Outline CEMP [REP6-029]**, **Outline SRMP [REP6-035]**, **Outline LEMP [REP6-037]** and **Outline OEMP [REP6-031]**, including monitoring and remedial action where deterioration is identified. Accordingly, the updated figures do not provide evidence that the Scheme will increase off-site flood risk. They show the baseline pathways which the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Scheme design and management measures are required to maintain and protect.
SLD-016	Hydrology, Flood Risk and Drainage	REP5-096 – Hydraulic Modelling Report	2.3.4. The hydraulic modelling report for the Gauze Brook has been updated from the original version produced at Deadline 3 [REP3-131] to take into account comments from the Environment Agency. A more sophisticated version of the model has been used, and there are improved measurements of the culvert which conducts the Gauze Brook under the railway.	The Applicant notes SLD's summary of the revisions to the Gauze Brook hydraulic model. The updated modelling **Lime Down D - Hydraulic Modelling Report [REP5-095]** (Revision 2) has incorporated additional survey information and revisions arising from the Environment Agency's technical review. The most relevant current position is the Environment Agency's **Comments on any submissions received at deadline 5 [REP6-074]**. Having reviewed the updated Hydraulic Modelling Report, the Environment Agency states that it has no concerns regarding the modelling approach adopted or the methods used to calculate the design flood flows. The

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Environment Agency is continuing its review of the hydraulic model files themselves and has indicated that it will provide any further comments arising from that review. The Applicant will respond to any further technical comments should they arise. At present, however, there is no outstanding Environment Agency concern with the modelling approach or flood-estimation methodology reported for Gauze Brook.
SLD-017	Hydrology, Flood Risk and Drainage	REP5-096 – Hydraulic Modelling Report	2.3.5. The presentation in the tracked changes report appears to show that the revised model produces smaller flood depths towards Corston but a wider flood extent on the floodplain above Corston than the original model. Although larger, the modelled flood extent [REP5-096] Figure 4 is still smaller than that observed during Storm Bert even for the 1% AEP +39% climate	The Applicant does not agree that the comparison with the Storm Bert photographs demonstrates that the updated hydraulic model underestimates the design flood extent. The Applicant accepts that the metadata now described by SLD can assist in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			change event. Storm Bert was an approximately 1% AEP event ([REP1-176]). This suggests that the modelling is still underestimating real flood extents.	establishing the time and location at which the imagery was recorded. The imagery is therefore useful evidence of flooding during a particular observed event. It does not, however, provide the event-specific inflow hydrograph or peak discharge required to calibrate the model quantitatively. Nor can a return period attributed to Storm Bert at a broader rainfall-event or catchment level automatically be treated as equivalent to the 1% AEP peak flow at the relevant Gauze Brook model location. The observed flood response will have been affected by the spatial and temporal distribution of rainfall, antecedent catchment wetness, channel and drainage condition, local blockage conditions and the timing of tributary inflows. Those parameters are necessary to establish a like-for-like

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				comparison between an observed event and a design-event hydraulic model. The updated model is based on surveyed hydraulic structures and topographic information and has been revised following Environment Agency review. Importantly, the Environment Agency's current position is that it has no concerns regarding the modelling approach or methods used to calculate the design flood flows (Environment Agency's **Comments on any submissions received at deadline 5 [REP6-074]**), while its review of the model files continues. The Storm Bert evidence is therefore relevant contextual information. It does not provide a technical basis for SLD's conclusion that the design model has

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				been demonstrated to underestimate flood risk.
SLD-018	Hydrology, Flood Risk and Drainage	REP5-096 – Hydraulic Modelling Report	2.3.6. The report goes on to model peak flows in the Gauze Brook and its two tributaries utilising methods from the UK Centre for Ecology & Hydrology's Flood Estimation handbook (FEH), as was done for the Rodbourne Brook in [REP4089]. Stop Lime Down's Deadline 5 Submission [REP5-130] §2.6.12 to 2.6.17 identifies flaws in the modelling of the Rodbourne Brook and what was then known of the Gauze Brook modelling. In particular, there was data available from flow gauges to enable the model predictions to be checked.	The Applicant notes SLD's comments on the Rodbourne gauge. The gauge is operated primarily as a low-flow station and is not identified as suitable for QMED (the median annual maximum flood) estimation or pooling. Higher-flow values are available, but these are estimated and do not provide a sufficiently robust basis for deriving or calibrating design flood peaks at the Scheme location. Gauze Brook has therefore been treated as ungauged for flood estimation, with design flows derived using the FEH Statistical Method and appropriate donor catchments. This approach has been reviewed by the Environment Agency, which raised no concern with the methods used to calculate the design

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				flood flows (Environment Agency's **Comments on any submissions received at deadline 5 [REP6-074]**).
SLD-019	Hydrology, Flood Risk and Drainage	REP5-096 – Hydraulic Modelling Report	2.3.7. The Applicant is aware of this gauge but states: "The Rodbourne river gauge station (53020 Gauze Brook @ Rodbourne) is located a short distance downstream of the study area; however, this is designated as a low flow station to monitor the impact of groundwater abstraction/recharge on river flow and is not indicated as being suitable for QMED estimates or pooling. Gauze Brook is therefore considered to be ungauged within the study area." (QMED is the median annual maximum flood)."	The Applicant maintains the position set out in the **Lime Down D - Hydraulic Modelling Report [REP5-095]**. A water-level record from a station principally intended for low-flow monitoring can provide useful contextual information, but that does not make the station suitable for direct calibration of flood peaks. Conversion of recorded stage to high-flow discharge is dependent upon the quality and range of the station rating. Where the high-flow rating is not sufficiently reliable for flood-frequency purposes, the resulting estimated high-flow series cannot appropriately be treated as equivalent to a directly gauged flood-flow record or used as a substitute for a robust QMED and design-flow assessment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				For that reason, Gauze Brook has been treated as ungauged for the purpose of the design hydrology and an FEH-based approach has been adopted. The Environment Agency's current review provides independent assurance on this point. It records no concerns with the methods used to calculate the design flood flows (Environment Agency's **Comments on any submissions received at deadline 5 [REP6-074]**).
SLD-020	Hydrology, Flood Risk and Drainage	REP5-096 – Hydraulic Modelling Report	2.3.8. While the fact that the gauge is designed primarily for monitoring low flows is acknowledged, the national databases still hold data from the Rodbourne gauge at higher flows. However, SLD acknowledges that they are marked as "estimated" and are probably of lower accuracy than those	The Applicant notes that SLD accepts that the use of donor sites is consistent with Flood Estimation Handbook methodology. The remaining observation, that some donor sites are geographically distant, does not of itself identify a deficiency in the assessment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			from a full-range gauge. On this basis, the Applicant has utilized data from analogous "donor" sites with similar characteristics. SLD accepts that this approach is consistent with FEH method, although notes that many of these "donor" sites are from very different parts of the country.	FEH donor and pooling-group selection is based upon the hydrological suitability of the available records, similarity of relevant catchment characteristics and record quality. Geographic proximity is not the sole or determinative criterion. A nearby station with an unsuitable high-flow rating is not necessarily a better basis for flood estimation than a more distant but hydrologically appropriate donor record. The design-flow methodology adopted for Gauze Brook has now been reviewed by the Environment Agency, which records no concerns with the methods used to calculate the design flood flows (**Environment Agency's Comments on any submissions received at deadline 5 [REP6-074]**).
SLD-021	Hydrology, Flood Risk and Drainage	REP5-096 – Hydraulic	2.3.9. The 30-year return period flood peak according to the model is given as 10.54 m3s-1 ([REP5-096] Section 6.5) –	The Applicant notes that SLD accepts that the use of donor sites is consistent

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Modelling Report	in other words this flow should be exceeded once every 30 years on average. Professor Skeffington notes however that if the flow gauge data were utilized, the data would show this output flow exceeded at least 25 times in the last 30 years. This supports SLD's concern that the Applicant's modelling is underestimating flood extents.	with Flood Estimation Handbook methodology. The remaining observation, that some donor sites are geographically distant, does not of itself identify a deficiency in the assessment. FEH donor and pooling-group selection is based upon the hydrological suitability of the available records, similarity of relevant catchment characteristics and record quality. Geographic proximity is not the sole or determinative criterion. A nearby station with an unsuitable high-flow rating is not a better basis for flood estimation than a more distant but hydrologically appropriate donor record. The design-flow methodology adopted for Gauze Brook has now been reviewed by the Environment Agency, which records no concerns with the methods used to calculate the design

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				flood flows (Environment Agency's **Comments on any submissions received at deadline 5 [REP6-074]**).
SLD-022	Hydrology, Flood Risk and Drainage	REP5-096 – Hydraulic Modelling Report	2.3.10. The Report also observes that "sewer networks are unlikely to extend the topographic catchment" (Section 3.3). However, as SLD pointed out in [REP5-130]§2.6.16, the Gauze Brook takes sewage input from Grittleton which is outside the Gauze Brook catchment boundary. As stated before, although the volume of sewage will probably not be material, the area has a problem with groundwater influx into foul drainage pipes which can increase flows substantially. This is cited by Wessex Water as the main reason for the discharge of untreated sewage at Hullavington sewage treatment works, as the works becomes overwhelmed by the volume of input water. Wessex Water should be able to advise on the flows involved, which will increase	The Applicant accepts that treated effluent may include water originating outside the topographic catchment and that any such existing discharge forms part of the catchment baseline. The point does not, however, demonstrate that the Gauze Brook design flood flows are materially underestimated. To determine whether an external effluent contribution is relevant to a design flood peak, it would be necessary to quantify the discharge magnitude and hydrograph and its timing relative to the catchment flood peak. SLD has not provided that information and itself acknowledges that the volume of sewage is unlikely to be material.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Gauze Brook flows over those calculated.	Similarly, groundwater ingress to the foul sewer network may affect sewer-system performance and the frequency of storm discharges, but it cannot simply be added to the Gauze Brook design flood flow without establishing the relevant pathway, discharge rate and timing during the flood event being assessed. The matters identified by SLD therefore do not provide evidence of a material additional flood-flow component sufficient to invalidate the FEH design-flow assessment. The Environment Agency has reviewed the updated flood-estimation methodology and records no concerns with the methods used to calculate the design flood flows in their **Comments on any submissions received at deadline 5 [REP6-074]**.
SLD-023	Hydrology, Flood Risk and Drainage	REP5-098 – The Applicant's	2.3.11. SLD1-094: SLD agrees that the issues mentioned in the Applicant's third paragraph are important. SLD does not	The Applicant has considered the modelling presented in Appendix D of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Response to Submissions Received at Deadline 4	accept that the Applicant has properly addressed them in the reports cited, and refers the Applicant to SLD's Deadline 5 Submission ([REP5-130] Appendix D) where modelling is used to demonstrate the heightened risk of runoff under panels from many of the soil types on site.	SLD's **Responses to the ExA's second written questions [REP5-130]** and has prepared a detailed response in the **Applicant's Response to SLD Deadline 6 Submission - Hydrology [REP5-130] [EN010168/EXAM/9.88]** at Deadline 7. The potential for Solar PV Panels to concentrate rainfall locally at the lower edge of a panel is not disputed and is already recognised in the Applicant's assessment. This issue was considered in detail in FHW2.9 of the **Applicant's Response to the ExA's Second Written Questions [REP5-097]**, pp. 212-215, including reference to the published research. Cook and McCuen (2013), *Hydrologic Response of Solar Farms*, found that Solar PV Panels did not

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				significantly affect runoff volume, peak flow or time to peak where runoff discharged onto maintained grass, while greater effects could arise where the receiving ground was bare or gravelled. Elamri et al. (2018) similarly demonstrated that panel geometry can affect the local distribution of rainfall beneath and between panel rows, but did not establish a corresponding increase in runoff at field or catchment scale. This distinction is important when considering SLD's modelling. Demonstrating that rainfall concentrated at a panel edge can exceed the infiltration capacity of the soil immediately at that location does not demonstrate that the same volume of water subsequently leaves the field or reaches a watercourse as additional runoff. Between the panel edge and the receiving drainage network, runoff

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				interacts with the permeable ground surface, vegetation, surface roughness and microtopography and may infiltrate or be temporarily stored as it moves downslope. Whether local rainfall concentration develops into connected runoff therefore depends principally on soil condition and compaction, vegetation cover, slope, erosion or channelisation and connectivity to existing drainage features. This is why those factors, rather than the panel surface itself, are the focus of the mitigation and monitoring secured through the relevant environmental management plans. SLD's modelling identifies a potential local runoff mechanism under the assumptions used, but it does not quantify the resulting change in runoff

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				leaving the field, the timing or volume reaching a receiving watercourse, or any consequent change in downstream peak flow or flood level. It therefore does not demonstrate the increase in off-site flood risk asserted by SLD. The Applicant consequently maintains the conclusion set out in FHW2.9 of the **Applicant's Response to the ExA's Second Written Questions [REP5-097]** that the Solar PV Panelled Areas remain predominantly permeable and that the potential hydrological effects of rainfall redistribution are appropriately controlled through management of vegetation, soils, compaction and drainage connectivity.
SLD-024	Hydrology, Flood Risk and Drainage	REP5-098 – The Applicant's Response to Submissions	2.3.12. SLD1-095: SLD acknowledges that the Applicant has produced a clearer explanation of the Manning's modelling, though it maintains its position, supported by the EA in [REP3-	The Applicant does not agree that the earlier Environment Agency comment cited by SLD renders the current Manning-based assessment unreliable.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Received at Deadline 4	146] FHW1.5, that the results are not credible. The EA observes: "The analysis submitted by SLD with respect to the applicant's calculated flows based on the Mannings equation is correct in that the calculated flows are large at some of the cross-sections and unrealistic when placed in the context of catchment area and recorded flows on the River Avon at Fosse Way and Great Somerford, and on the Gauze Brook at Rodbourne for Storm Bert in 2024. As an example, the catchment where the flow calculation of 154.2m3 /s is shown for cross section C1-2 within Lime Down C1 has an area of 3.91km2 based on the Flood Estimation Handbook (FEH) webservice (catchment outlet grid reference: 387200,183950). The true peak 0.1% (1 in 1000) annual exceedance probability flow could be potentially an order of magnitude or more lower than 154.2m3 /s based off catchment area"	The purpose and limitations of the calculation have been clarified in the revised site-specific Flood Risk Assessments. The Manning equation is used at representative LiDAR-derived cross-sections to establish a local level-flow relationship and assess the scale of change in water level associated with the applicable climate change uplift for smaller ordinary watercourses and drainage features where detailed hydraulic modelling would be disproportionate. It is not used as a substitute for FEH catchment hydrology, and the intermediate equivalent-flow values should not be interpreted as independently derived catchment design discharges or as directly comparable gauged flood flows.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The assessment is also informed by the Environment Agency's updated NaFRA2 / Risk of Flooding from Surface Water mapping, which provides a precautionary spatial indication of potential exceedance routes and extents where smaller watercourses do not have formal Flood Zone mapping. For example, the current Lime Down C1 FRA expressly distinguishes the Manning assessment from detailed hydraulic modelling and explains the role of the surface water mapping in the assessment. At locations where the scale and sensitivity of the flood mechanism warrant it, including Gauze Brook at Lime Down D and Gabriel's Well / Rodbourne Brook at Lime Down E2, detailed 1D/2D hydraulic modelling has been undertaken.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The current approach is therefore tiered and proportionate. SLD's comparison of intermediate Manning equivalent flows with catchment-scale recorded or estimated flows does not reflect the purpose for which the calculations are used.
SLD-025	Hydrology, Flood Risk and Drainage	REP5-098 – The Applicant's Response to Submissions Received at Deadline 4	2.3.13. The EA then explains that the Manning's modelling was in support of using the Risk of Flooding from Surface Water (RoFSW) mapping as a proxy for fluvial flood risk, where the latter is not mapped. SLD does not dissent from the use of the RoFSW mapping in this way,but would suggest that the Manning's modelling should be producing more credible results before it can be used to support this, or any other, proposition.	The Applicant notes that SLD does not dispute the use of the Environment Agency's Risk of Flooding from Surface Water mapping as a proxy to help identify potential flood routes associated with smaller watercourses for which formal fluvial Flood Zone mapping is unavailable. This materially narrows the area of technical disagreement because the underlying assessment approach is therefore accepted in principle. The remaining disagreement relates to the robustness and role of the supplementary Manning-based calculations, rather than the use of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				RoFSW mapping itself to identify potential flood routes and inform the assessment. The current Flood Risk Assessments use the updated NaFRA2 / surface water mapping as a precautionary indication of potential routes and extents, supplemented by local Manning-based level-flow assessment to consider design-event water levels including climate change. The Manning calculation is not relied upon as an independent catchment flood-frequency model. The updated NaFRA2 mapping generally shows smaller extents than those adopted as the precautionary basis of the assessment. In the Applicant's view, the combination of national mapping, local topographic

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				assessment, proportionate open-channel calculations and detailed hydraulic modelling at the principal sensitive watercourses provides an appropriate evidence base. Additional site-wide hydraulic modelling would not materially improve the assessment and is not considered necessary or proportionate.
SLD-026	Hydrology, Flood Risk and Drainage	REP5-098 – The Applicant's Response to Submissions Received at Deadline 4	2.3.14. SLD1-097: SLD notes that the issue in respect of sensitive equipment within the floodplain has now resolved. The Applicant has committed to a maximum height of 4.5 m for the tracking panels and 3.5 m for the fixed panels without submerging sensitive equipment. The Applicant has committed to the panels being positioned no less than 0.6m above the design flood level.	The Applicant notes that SLD confirms this issue is resolved. The Environment Agency has likewise recorded the freeboard matter as agreed in its Deadline 6 position **[REP6-074]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-027	Hydrology, Flood Risk and Drainage	REP5-109 – Natural Flood Management Viability Report	2.3.15. This report uses the hydraulic model developed in [REP5-096] to investigate the possibilities for control of flooding in Corston by Natural Flood Management (NFM) in the Lime Down D area, concluding that NFM is not a viable option. NFM options were scoped by using SCALGO Nature Insight which is a screening tool developed by SCALGO, a Danish environmental software company, and Arup, an engineering consultancy. This ruled out "*structural or highstorage interventions such as runoff attenuation features, floodplain reconnection, or large woody debris, due to local slope, land use constraints, and limited upstream flow accumulation. Instead, NatureInsight prioritised nonstructural interventions that focus on enhancing topsoil permeability, avoiding bare soil, and increasing surface roughness along agricultural boundaries to promote localised infiltration.*"	The Applicant notes that SLD's summary broadly reflects the purpose and findings of the **Lime Down D - Natural Flood Management Viability Report [REP5-109]**. The report was prepared to consider whether additional NFM measures within Lime Down D could provide meaningful betterment to the existing flood risk at Corston. It is not mitigation required to make the Scheme acceptable in flood-risk terms. The submitted **Flood Risk Assessments and Outline Drainage Strategies [REP4-021, REP5-047 to REP5-060** and **REP3-063]** separately assess the effects of the Scheme and conclude that, with the secured mitigation in place, it will not materially increase flood risk elsewhere.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The NFM assessment identified that the measures most suited to Lime Down D are primarily non-structural, including maintaining soil permeability, avoiding bare ground and increasing surface roughness. These measures are consistent with the soil, vegetation and runoff-management measures already embedded within the Scheme. The report also found that the potential influence of measures confined to Lime Down D on flooding at Corston is limited by the relatively small proportion of the Gauze Brook catchment represented by the Site. The report has been updated at Deadline 7 in response to the Environment Agency's comments, including further assessment of a more frequent flood event and clearer

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				presentation of the modelled NFM effects.
SLD-028	Hydrology, Flood Risk and Drainage	REP5-109 – Natural Flood Management Viability Report	2.3.16. The report points out, however, that because the Lime Down D area is only a small proportion of the Gauze Brook catchment, this would have a negligible effect on flooding in Corston. Notwithstanding the NatureInsight results, which look a little crude, they attempted to model structural interventions by modelling the excavation of the floodplain by 300 mm or 600 mm. These had no effects at all at Corston in the modelling, because the 8m buffer strip round the stream channels largely prevented the storage volume from filling. This is hardly an insuperable problem as an engineered filling facility could be provided. SLD accepts, as the Applicant's expert observes, that these large interventions are only about a quarter of what would be needed to prevent flooding by the 1% AEP + 39% event.	The Applicant does not agree that providing an engineered means of filling the modelled storage area would overcome the fundamental limitation identified by the NFM assessment. Even if the hydraulic connectivity of the lowered area were optimised, that would not create the additional storage volume required. The **Lime Down D - Natural Flood Management Viability Report [REP5-109]** identifies that approximately 469,000 m³ of temporary storage would be required to reduce the 1% AEP plus 39% climate change peak flow at Corston to approximately the 8.4 m³/s threshold for the onset of out-of-bank flooding.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The larger modelled storage option provides approximately 125,900 m³, around 27% of that requirement. An improved inlet arrangement cannot overcome the remaining storage deficit of approximately 343,000 m³. The limitation is also catchment-scale. Lime Down D represents less than 8% of the approximately 26.3 km² catchment draining to Corston. The hydraulic assessment further identifies significant local conveyance constraints affecting flooding within Corston. Those constraints would not be removed by improving the filling efficiency of storage within Lime Down D. A purpose-designed offline flood-storage scheme with engineered inlet and outlet controls would constitute a separate flood-alleviation project, requiring its

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				own land requirements, hydraulic design, environmental assessment, consenting and long-term maintenance arrangements. It is not mitigation required for the Scheme, for which the relevant flood-risk requirement is that the development remains safe and does not increase flood risk elsewhere. For context, the current Wiltshire Council position records that the Council does not dispute the technical finding that interventions confined to Lime Down D are unlikely to provide a significant reduction in downstream fluvial flood risk at Corston. Its remaining concern relates to consideration of wider multifunctional and NFM opportunities across the Scheme rather than the technical conclusion of the Lime Down D assessment itself.
SLD-029	Hydrology, Flood Risk and Drainage	REP5-109 – Natural Flood Management	2.3.17. Alleviation of smaller but more frequent floods would be more feasible	The Applicant notes SLD's comment. The Environment Agency has subsequently made a similar request for

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Viability Report	and could still be worthwhile, but there is no analysis of this.	further information on the performance of the NFM options during a more frequent flood event. The **Lime Down D - Natural Flood Management Viability Report [EN010168/APP/9.66]** (Revision 2) has therefore been updated for Deadline 7 to include assessment of the 3.3% AEP (1 in 30-year) event, together with comparison mapping and additional discussion of the magnitude and extent of any flood-risk benefit. This additional assessment provides further information on the potential for the NFM options to influence smaller, more frequent events. It does not change the purpose of the report, which is to assess whether practicable interventions within Lime Down D could provide meaningful downstream flood-

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				risk betterment. The results of the additional modelling and the conclusions arising from it are presented in the updated report.
SLD-030	Hydrology, Flood Risk and Drainage	REP5-109 – Natural Flood Management Viability Report	2.3.18. The Applicant's expert also points out that the road bridge over the A429 restricts high flows and is a major cause of flooding in the village (a "conveyance constraint"). The model results and local experience suggest this is a valid point. The Applicant's expert recommends hard engineering solutions to address the problem and offer the model files free of charge to anyone designing a future scheme.	The Applicant notes SLD's acknowledgement of the conveyance constraint at the A429 crossing and the consistency between the modelling and local observations. The **Lime Down D - Natural Flood Management Viability Report [REP5-109]** identifies this constraint as an important influence on existing flood risk at Corston. This is relevant because it demonstrates that flooding within the village is not governed solely by runoff generated further upstream and that measures confined to Lime Down D cannot, in isolation, address the existing flood mechanism.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Meaningful reduction in flood risk at Corston would therefore likely require targeted engineering measures at or within the village, potentially including modifications to the A429 bridge or associated structures and, depending on the outcome of further assessment, local flood defence measures such as flood walls. Any such intervention would need to be developed as a separate flood-alleviation scheme, with its own feasibility assessment, hydraulic design, environmental assessment, land requirements, consenting and maintenance arrangements. To assist any future work, the Applicant has offered to make the configured

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				hydraulic model available without charge to the relevant Risk Management Authorities.
SLD-031	Climate Change and Energy Need	Climate	2.4.1. The University of Derby has reviewed REP5-108 (Climate Change Response to Stop Lime Down Appendix D) and REP5-023 (Updated ES Chapter 7), comments on which are provided within Appendix B to this document.	The Applicant makes note of this comment.
SLD-032	Socio-Economics, Tourism and Recreation	REP5-098 – The Applicant's Response to Submissions Received at Deadline 4	2.5.1. WM-005: The Applicant responds to criticism that there has been no engagement with Whatley Manor. It explains that Whatley Manor was located within the core consultation zone within the Consultation Report [APP-022], and that *"the primary reasons for Whatley Manor Hotel not being given additional consideration as a business receptor is due to: its distance from the Scheme at a minimum of 1.5km to the north of Lime Down B, intervening topography and vegetation largely limiting any visual impacts to clients at the hotel; and that the usual approaches*	The Applicant refers back to its comments at 'WM-005' in **The Applicant's Response to Submissions Received at Deadline 4 [REP5-098]** which explains that Whatley Manor was included within both non-statutory and statutory consultation, but that specific additional assessment of impacts to the hotel were not undertaken due to the 1.5 km separation (including further separating topographic and vegetation) between it and the nearest part of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			to the hotel (particularly for guests travelling from afar) would be along routes that are negligible affected by construction traffic (the A429 from M4 J17 to Malmesbury, or the A46 and B4039 from M4 J18 through Luckington and Sherston.) SLD does not accept that any of these reasons offer a satisfactory reason for not engaging with Whatley Manor further. As discussed further below, the Applicant should have conducted a wider assessment having regard to the scale of the Scheme.	The Applicant is confident that the assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and its supporting documents is robust and proportionate.
SLD-033	Socio-Economics, Tourism and Recreation	REP5-111 – Technical Note on Impacts to Non-Equine Businesses	2.5.2. The Applicant has drafted a technical note on impacts to non-equine businesses in response to the Examining Authority's question SE2.2, which explains that a technical note should be provided which details "*the nature of the affected business, their concerns, and what the applicant has done to address those concerns.*"	The Applicant notes this comment and confirms the **Technical Note on Impacts to Non-Equine Businesses [REP5-111]** was drafted in response to request made by the Examining Authority at SE2.2 in their **Second Written Questions [PD-014]**.
SLD-034	Socio-Economics,	REP5-111 – Technical Note on	2.5.3. SLD has serious doubts in respect of the quality of the Applicant's baseline assessment. At §2.1, the Applicant	The 5 km Study Area referred to in the **Technical Note on Impacts to Non-Equine Businesses [REP5-111]** is

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Tourism and Recreation	Impacts to Non-Equine Businesses	identifies a "5 km Study Area" covering "an area of more 390m2 over much of northwest of Wiltshire and a small portion of the neighbouring South Gloucestershire and Cotswold District." Setting aside the grammatical errors in this sentence, SLD does not understand what area was selected, how it was selected, or on what basis. Principally, SLD requests that the Applicant provide a map outlining the scope of the Study Area and on what basis it was drawn.	based on a 5 km offset from the Scheme's Order limits, as was used for the 5 km Study Area in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. For reference, this can be seen as demarcated as the outer of the two black dashed lines on **ES Volume 2, Figure 16-1 Study Areas for Socio-Economics, Tourism and Recreation [APP-168]** (which shows local authority boundaries for context) and **Figure 16-2 Tourism and Recreation Sites [APP-168]**.
SLD-035	Socio-Economics, Tourism and Recreation	REP5-111 – Technical Note on Impacts to Non-Equine Businesses	2.5.4. Secondly, and in any event, within 5km of the Solar PV Sites is too small an area of search for the purpose of assessing local impacts. Given the scale of the scheme, it would be reasonable for a regional impact study to have been undertaken on the basis of administrative area boundaries. Alternatively, given the proximity to the Cotswolds, it would have been reasonable for this study to extend into	Ther Applicant refers to **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** which used a 20 km Study Area for impacts to employment and economic sectors across administrative boundaries, including the Cotswolds National Landscape, and made comparative references to the South West ITL1 region.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the Cotswolds district, taking into account the functional economic geography of the area.	The use of the 5 km Study Area in the **Technical Note on Impacts to Non-Equine Businesses [REP5-111]** was in direct response to requests for these impacts to be understood at a smaller scale by the Examining Authority (ExA) through their **Second Written Questions [PD-014]**.
SLD-036	Socio-Economics, Tourism and Recreation	REP5-111 – Technical Note on Impacts to Non-Equine Businesses	2.5.5. Thirdly, SLD have doubts in respect of the quality of the data relied upon for Table 1. Table 1 identifies the "proportion of businesses and employment in the 5km Study Area and within 5km of the Solar PV Sites", relying apparently on the UK Business Count 2025 and the Business Register and Employment Survey 2024. Table 1 identifies the largest business sector within the 5km Study Area as construction and professional, scientific, and technical. The latter is perhaps unsurprising, given the proximity of the Dyson Campus outside Malmesbury, but construction being the largest business sector does not align with local	The Applicant confirms that the datasets used in **T**able 1 of the **Technical Note on Impacts to Non-Equine Businesses [REP5-111]** demonstrate that by sector, the Construction industry has the 2nd greatest number of registered businesses in the 5 km Study Area overall, and the 3rd largest when just considered within 5 km of the Solar PV Sites. However, by number of employees, the Construction industry is ranked 10th in the 5 km Study Area overall, and 4th largest when just considered within 5 km of the Solar PV Sites. This

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			understanding. SLD would invite the Applicant to provide it the data relied upon for producing the percentages within Table 1.	demonstrated that construction businesses tend to have a smaller number of employees than in other sectors (average for these datasets indicates an average of 5.2-5.5 employees per business). The construction industry in these datasets also includes a large variety of types of trades[1] (ranging from utility construction companies to domestic builders, and including specialist trades such as electrical and plumbing installation, groundworks and fencing contractors) and as such includes trades that the Applicant does not necessarily consider are transferrable to work on the Scheme. These factors may go some way to explain how the presentation of this data

[1] Section F Construction / SIC codes 41100-43999. Nature of business: Standard Industrial Classification (SIC) codes. Available at resources.companieshouse.gov.uk/sic/

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				may not immediately align with local understanding. The data sources used for Table 1 of the **Technical Note on Impacts to Non-Equine Businesses [REP5-111]** are the UK Business Counts - enterprises by industry and employment size band (2025) and Business Register and Employment Survey: open access (2024). These are both publicly available through the Office for National Statistics or the NomisWeb official census and labour market statistics hub. Data for both datasets was based on 2021 Census mid-layer super output areas covering the 5 km Study Area.
SLD-037	Socio-Economics, Tourism and Recreation	REP5-111 – Technical Note on Impacts to Non-Equine Businesses	2.5.6. At §2.1.3, the Applicant then states: "Table 1 identified that the largest industries in the 5 km Study Area by number of registered businesses and employment are in construction, and	To clarify, the **Technical Note on Impacts to Non-Equine Businesses [REP5-111]** has identified businesses in the area within 5 km of the Solar PV Sites, and within 5 km of the Order Limits overall.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			professional, scientific & technical services. The latter is very apparent in the area within 5 km of the Solar PV Sites, as a result of the large quantum of workers at the Dyson Campus outside Malmesbury. The area within 5 km of the Solar PV Sites also has the notable characteristic of a large accommodation & food services employment but not a similarly large business registry, implying that there are more larger employers in this industry near the Solar PV sites than is found further along the Cable Route Corridor. This is understood due to the larger accommodation venues at Whatley Manor Hotel, Manor House Castle Combe, and the location of the M4 Leigh Delamere motorway services. Other visitor dependent sectors, such as retail and arts, entertainment, recreation & other services are generally consistent across the 5 km Study Area."	This has been done to provide detail at the scale requested by the Examining Authority, while also being able to demonstrate the differences between the area surrounding the Solar PV Sites (which consist of the five main sites known as Lime Down A-E and any interconnecting cabling), and the area around the Cable Route Corridor (stretching from west of Hullavington to the Melksham National Grid substation). This has been done as the Applicant recognises that the cable route is in proximity to larger urban areas (Chippenham, Corsham and Melksham) than the Solar PV Sites (where Malmesbury is the only large town within 5 km). The Applicant has sought here to comment on the difference between the proportion of registered businesses by sector and the proportion of the local workforce in that sector.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			2.5.7. SLD does not understand on what basis the Applicant concludes from Table 1 at §2.1.3 that "there are more larger employers in this industry near the Solar PV Sites than is found further along the cable route corridor." Again, SLD seeks clarity on the point which the Applicant is seeking to make.	The chosen examples within 5 km of the Solar PV Sites are that of the professional, scientific & technical industry, which has 17.8% of the number of registered businesses but 28.3% of the workforce, and the accommodation & food services industry which has only 3.8% of the registered number of business but employs 11.4% of the workforce. This shows that the character of these industries are defined by business with a larger number of employees that in other industries. The comparison to the rest of the 5 km Study Area overall is to show how these industry sectors differ around the Solar PV Sites when compared to elsewhere along the Cable Route Corridor.
SLD-038	Socio-Economics,	REP5-111 – Technical	2.5.8. While Whatley Manor is within 5km of the Solar PV Sites, the relevance	The Applicant confirms that reference to Castle Combe and Leigh Delamere is

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Tourism and Recreation	Note on Impacts to Non-Equine Businesses	of Manor House Castle Combe and M4 Leigh Delamere is not understood – save that the latter two may be just within 5km of the cable route corridor. It is assumed then, that the Study Area must include large towns south of the M4, such as Chippenham and Corsham. However, it appears that Malmesbury has been excluded, despite being a town which is much closer to the PV panels and a tourist destination which is far more likely to be impacted during both construction and operation than large towns along the cable route.	due to these locations being within 5 km of the Solar PV Sites. (Manor House ~5.0 km from Lime Down C, and Leigh Delamere ~3.8-3.9 km from Lime Down C, D, and E). When interrogating the location of accommodation and food services businesses by lower super output areas, the Castle Combe and Stanton data area (Wiltshire 008D) had the greatest number of employment within the data areas falling within 5 km of the Solar PV Arrays: more than 3 times the employment in Malmesbury. These examples were identified as the largest employment hubs and therefore remarked upon in the **Technical Note on Impacts to Non-Equine Businesses [REP5-111]** to contextualise this. This is specific to the area within 5 km of the Solar PV Sites and as such towns like Corsham and Chippenham have not been included when making this point. At no point has Malmesbury been

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				explicitly excluded, it as just not been remarked upon except where there is a feature of note (such as has been done with the Dyson Campus).
SLD-039	Socio-Economics, Tourism and Recreation	REP5-111 – Technical Note on Impacts to Non-Equine Businesses	2.5.9. At §2.1.4, the Applicant states that it has "largely sought to avoid land adjacent to settlements, and as such has largely avoided direct impacts to the majority of business premises or services associated with those settlements." However, it is difficult to understand how the Applicant has reached this conclusion, given the Scheme's proximity to settlements including Malmesbury, Sherston, Hullavington, Alderton, Foxley, Luckington, Corston, Rodbourne, Stanton St Quintin and Norton – and without having conducted a survey of the many businesses which will be impacted by the scheme (including many of those in the hospitality and tourism industries).	The Scheme, particularly the Solar PV Sites, are located in a largely rural part of North Wiltshire, with the location of the Solar PV Array set back away from each of the settlements identified by SLD so that immediate effects from the Scheme are not anticipated to have significant effects on residential and business properties.
SLD-040	Socio-Economics,	REP5-111 – Technical	2.5.10. SLD are surprised by the Applicant's explanation, at §4.4.6, that a	The Applicant refers back to paragraph 2.1.2 of the **Technical Note on Impacts**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Tourism and Recreation	Note on Impacts to Non-Equine Businesses	comprehensive business survey was not conducted because it would have been too onerous for a scheme of this size. Clearly, the size and scale of the scheme offer a basis for assessing those business impacts in greater detail – as opposed to relying on deeply flawed desk-based assessments.	**to Non-Equine Businesses [REP5-111]** which identified approximately 5,000-5,600 businesses within the 5 km Study Area, of which approximately 1,400 are within 5 km of the Solar PV Sites. This demonstrated that a comprehensive survey would be disproportionate to the likely level of impact from the Scheme. The Applicant furthermore sets out its proposed methodology for economic assessment in July 2024 through its EIA Scoping Report, to which no objection was received from the Secretary of State nor Wiltshire Council in the Scoping Opinion adopted by the Secretary of State on 22 August 2024. Where amendments to the methodology were discussed with Wiltshire Council through voluntary consultation, these were incorporated into the assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** for DCO submission.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-041	Socio-Economics, Tourism and Recreation	REP5-111 – Technical Note on Impacts to Non-Equine Businesses	2.5.11. SLD is in the process of producing a business survey, coordinated by a small number of volunteers. A questionnaire was circulated to businesses within the vicinity of the scheme for comment around the end of July. That questionnaire has asked businesses to describe their business/ organisation/ charity, its approximate turnover, the number of employees and any likely effects anticipated by the Scheme. While SLD accept that this survey will have some shortcomings (SLD is relying upon a small number of volunteers who are unable, of course, to undertake a full survey of every business), it is hoped that a sample of local businesses will be suitably illustrative of potential impacts. SLD have been careful to approach as broad a number of companies and commercial organisations as can be reasonably expected, including hospitality, equine business, agriculture, retail, and leisure companies. The only	The Applicant has reviewed the business survey produced by SLD and has responded in full through the **Applicant's Response to SLD Deadline 6 Submission – Business Survey [EN010168/EXAM/9.86]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			organisations intentionally excluded are those involved directly with the Scheme, such as those landowners whose farmland is part of the project, and their tenant farmers.	
SLD-042	Socio-Economics, Tourism and Recreation	REP5-111 – Technical Note on Impacts to Non-Equine Businesses	2.5.12. At the time of writing, SLD has received 74 responses. SLD has committed to keeping the survey open until September, so that businesses have an opportunity to respond after the summer break and a greater number of responses received before it is presented. To date, 68.9% of responses anticipate that Lime Down is likely to have a negative effect on their organisation, and 20.7% anticipate a severely negative effect. Of those who believed that the effect would be negative or severe (89.6% of those sampled): • 83.8% have identified increased traffic volumes and congestion as a cause of those negative effects;	The Applicant notes this comment and would be interested to know from SLD what the response rate on their business survey was (i.e how many respondents of those issued) and proportionally how many of those respondents were aware of and engaged with the DCO process for the Scheme. The Applicant hopes this can contextualise the level of response and engagement to the survey. For the benefit of comparison, the response rate for Stage One (non-statutory) consultation was approximately 12% (1,331 of 11,400 notices issued) and during statutory consultation was approximately 13%

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• 70.6% believe that customers will relocate away from the area; • 66.2% believe increased noise will have a negative effect; • 60.3% identify reduced local visitor numbers and 44.1% identify reduced international visitors as a concern; • 58.8% identify declining property valuations as a likely negative effect.	(1,491 of 11,400) (taken from the **Consultation Report [APP-022]**). Approximately 25% of questionnaires for the **Equine Business Report [REP5-105]** were responded to. As set out in **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** submitted at Deadline 7 it is concluded that the scheme during the construction and operation phases will result in no significant transport effects and the level of traffic generated by the scheme will not result in congestion. The greatest level of trips generated by the scheme will be during the construction phase which is temporary. As can be seen from **ES Volume 3, Appendix 14-3 Baseline Noise Survey [REP6-016]** and **ES Volume 3, Appendix 14-4 Noise Modelling [REP5-063]**, noise levels from the scheme would be below the typical existing ambient levels in the area, and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				are therefore are not likely to have negative impact on businesses.
SLD-043	Socio-Economics, Tourism and Recreation	REP5-111 – Technical Note on Impacts to Non-Equine Businesses	2.5.13. Additionally, 43.2% of those surveyed anticipated that the Scheme would have a material effect on the number of persons employed and lead to a decrease in the number of employees (in contrast to 55.4% who anticipated no likely effect on the number of employees). 86% anticipate that the Scheme would lead to a reduction in their annual turnover.	The Applicant notes this comment. The Applicant has identified that there may be some losses to employment and turnover in business sectors affected by the Scheme, as set out in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and set out in detail in response to representations made at previous deadlines to this DCO examination. The Applicant is however confident that the design and mitigation measures secured through the relevant management plans by the Requirements at Schedule 2 to the **Draft DCO [REP6-005]** are sufficient to ensure no significant adverse effects to businesses are likely to occur.
SLD-044	Socio-Economics,	REP5-111 – Technical Note on	2.5.14. SLD intends to produce the results of this survey and the summary of its findings at Deadline 7. For the	The Applicant notes this comment and awaits the business survey produced by SLD for Deadline 7.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Tourism and Recreation	Impacts to Non-Equine Businesses	avoidance of doubt, the consent of those surveyed will be obtained before it is shared.	
SLD-045	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	2.5.15. The Applicant has produced an Equine Business Report as a consolidated response to questions raised by the ExA in ExQ1 and ExQ2. 2.5.16. In SLD's view, the report has inappropriately set the threshold for its assessment at a level which obscures many other business impacts which should be taken into account. Principally, the Applicant has improperly focussed its attention on "business viability", which it defines at §4.1.1 as follows: *"Business viability relates to the ability of an equestrian facility to continue operating on a financially sustainable basis. A business remains viable where income generated through its activities is sufficient to meet operating costs.*	The Applicant confirms that the **Equine Business Report [REP5-105]** has been produced in response to the **ExA's First Written Questions [PD-010]** which specifically requested the assessment to be "*on job losses in and business viability of the equine sector (and its supporting industries)… focusing on evidence relating to equine health*" (SE1.9), the impact of "*thermal runaway event at the BESS…to take account of the potential effects on equine businesses*" (AQ1.5), and in respect to SE2.8 of the **ExA's Second Written Questions [PD-014]** respond to "*the sensitivities of these businesses to the proposed development*". The Applicant therefore considers that the produced report meets these requests in an appropriate manner.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Whilst profit margins may vary considerably between different types of equestrian business, viability is generally determined by the point at which ongoing costs begin to exceed income over a sustained period."	
SLD-046	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	2.5.17. Plainly, this overlooks many other impacts which the Scheme may have on equine businesses. The Applicant's assessment should not be concerned with only those businesses which will be unviable as a consequence of the Scheme. That will clearly be a significantly lower proportion than those businesses who are affected by the scheme. In SLD's view, the correct approach would be to consider impacts on business viability and, more broadly, reduction in turnover, a reduction in client numbers, reduced demand for services, or impacts on breeding and sales activity.	The **Equine Business Report [REP5-105]** has sought to demonstrate how impacts from the Scheme may affect equine health, business operations at equine facilities, and employment at equine businesses, all of which are considered contributing factors to understanding the economic impact of the Scheme on those businesses, their supply chain, and thus on the viability of those businesses. The report considers that with the mitigation measures set out in Section 5 of the **Equine Business Report [REP5-105]**, that significant adverse effects to equine health, job losses within the equine sector or its supporting industries, and thus on the viability of local equestrian businesses are not anticipated to be likely.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				This is therefore consistent with the assessment outcomes in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** which found no significant adverse effects to that industry in the Local Impact Area overall.
SLD-047	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	2.5.18. It is clear that the Applicant's approach to viability has led to it underestimating the extent and level of impacts on equestrian facilities and businesses. For example, at §6.1.3, the Applicant observes: "6.1.3 The Technical Note recognises that the equine sector is already operating under pressure, including rising costs, recruitment difficulties and tight margins in some parts of the industry. That context is relevant when considering how individual businesses may respond to disruption or perceived risk. Against that background, the main	The Applicant is confident that the **Equine Business Report [REP5-105]** has robustly and appropriately responded to requests made to provide further detailed information on the likely effects of the Scheme specifically on equine businesses. The Applicant acknowledges existing challenges in the industry, but is confident that the mitigation measures set out in Section 5 of the **Equine Business Report [REP5-105]** are suitable. These measures are secured by the relevant management plans by the Requirements in Schedule 2 to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			question for this assessment has been whether the Scheme would be likely to cause effects of a scale or duration that would materially affect the continued operation of local equestrian businesses. 6.1.4 Based on the evidence available, significant adverse effects on business viability are not expected. […] "6.1.7 …the evidence reviewed does not suggest that these construction effects would generally be of a scale likely to make equestrian businesses unworkable or commercially unviable. Construction effects would be temporary, would vary by location and phase, and can in many cases be reduced through practical controls such as timing, liaison, routing, screening and advance notice of higher-risk activities."	**Draft DCO [REP6-005]**. As such, it is the Applicant's position that significant adverse effects are not anticipated to equine businesses.
SLD-048	Socio-Economics,	REP5-105 – Equine	2.5.19. As a result, the assessment fails entirely to assess job losses or broader	The Applicant respectfully disagrees with this comment, as the **Equine**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Tourism and Recreation	Business Report	economic effects on equine businesses, which may in cumulation give rise to a significant adverse effect on equine businesses. The Examiners should therefore take into account the possible extent of the impacts on equine businesses along with other economic impacts in the planning balance.	**Business Report [REP5-105]** has sought to include a robustly and appropriately considered assessment of the economic impacts to the equine industry. The Applicant considers that this report should be considered alongside the outcomes of the assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** which identify no significant adverse effects to any assessed economic sector or industry (including equine businesses under the wider agricultural sector or sports and recreation sector).
SLD-049	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	2.5.20. In respect of the Applicant's comments on horse physiology, SLD does not accept that horses (including foals and youngstock) can "adapt quickly where disturbance is not associated with harmful or aversive experience" (§4.2.41). This does not align with experience, and SLD would	The Applicant clarifies that statements regarding adaptation in horses where disturbance carries no harmful or aversive experience is grounded in established principles of equine behavioural science and peer reviewed literature. As prey animals, equines possess an evolutionary learning

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			request scientific evidence to support this statement. Further, the bigger issue for many of these businesses is client confidence in the facilities in which horses are reared and cared for. Customers will not be satisfied to bring their horses to a facility where there is likely to be extended disruption as a consequence of construction and traffic or impacts on the amenity of the site as a consequence of the site's operation. Many businesses have informed SLD that they have been told by their clients that horses will be moved to competing facilities if the Scheme goes ahead.	mechanism that allows them to adapt to non-threatening environmental stimuli through habituation, thereby conserving energy and avoiding chronic physiological stress. The scientific literature cited within the **Equine Business Report [REP5-105]** demonstrates findings in the research by Janicka et al. (2024) which establishes that horses habituate rapidly to novel acoustic stimuli, with studies indicating that habituation typically occurs within one to seven repeats of a noise source, provided the stimulus is not accompanied by an aversive or painful experience. Similarly, research by Christensen et al. (2005) demonstrates that horses evaluate novel visual, olfactory, and auditory stimuli and learn not to respond when those stimuli carry no negative consequences.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				In response to comments regarding foals and youngstock, scientific evidence published by Powell et al. (2023) demonstrates that younger horses possess high neuroplasticity due to rapid brain development and curiosity, enabling them to process novel situations, complete associative learning tasks, and habituate faster than mature animals. Furthermore, foals turned out in pastures benefit from the calming influence of their dams, which suppresses panic responses to external background noise. The Applicant acknowledges existing challenges in the industry, and is confident that the mitigation measures set out in Section 5 of the **Equine Business Report [REP5-105]** are suitable to avoid significant adverse

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				effects to equine businesses. This is built on the principle that mitigation is applied in a layered manner with physical mitigation, procedures to reduce effects, and communication to ensure equine business owners are kept informed and able to be involved where practicable, are all in use to ensure adverse effects on businesses and thus their clients can be minimised. These measures are secured by the relevant management plans by the Requirements in Schedule 2 to the **Draft DCO [REP6-005]**. As such, it is the Applicant's position that significant adverse effects are not anticipated to equine businesses. The Applicant would anticipate that this should be sufficient to provide business owners with appropriate confidence to be able to pass on to their clientele.
SLD-050	Socio-Economics,	REP5-105 – Equine	2.5.21. Further, SLD does not accept that the Applicant's proposed mitigation	The Applicant respectfully disagrees and is confident that the mitigation measures set out in Section 5 of the **Equine**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Tourism and Recreation	Business Report	is satisfactory to remove any likely significant effects: • At §4.1.4, the Applicant suggests that business owners may be concerned about a greater need for indoor facilities. It should be noted that for most businesses, there is no scope for increasing indoor facilities as it is vital for the horses' welfare to have regular turnout, and there may be no alternative land for turnout due to ground conditions.	**Business Report [REP5-105]** are suitable to avoid significant adverse effects to equine businesses. These measures are secured by the relevant management plans by the Requirements in Schedule 2 to the **Draft DCO [REP6-005]**. With respect to commentary about increasing indoor facilities, this is a reason for mitigation measures being secured to reduce noise and vibration to equine facilities. These are secured through the Scheme design by the **Design Principles and Parameters [REP4-043]** and controls in the **Outline CEMP [REP6-029]**. These are secured respectively by Requirements 5 and 13 of Schedule 2 to the **Draft DCO [REP6-005]**.
SLD-051	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	• At § 4.2.19 the Applicant proposes that, as part of the set up of the Community Liaison Group, "an independent equestrian expert will be appointed to undertake regular	The Applicant has committed to providing an independent equestrian expert to the Community Liaison Group to give greater confidence to equine business owners that their concerns and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			engagement and act as a key point of contact with equestrian receptors." It is unclear what benefit equestrian expertise will provide for the purpose of merely "notifying" equestrian businesses in respect of the scheduling of construction activities. Equally, this does not remove the harmful impact of such disruption. Many equestrian businesses do not have extra pastureland to adjust to the construction activities. Those businesses may also need to accommodate visitors from vets and farriers on a daily basis, service of which may be interrupted by construction traffic.	contributions towards the Scheme heading into construction are being expertly addressed. It is also hoped that this increases confidence in the Community Liaison Group's ability to identify and contribute to conversations around the finalisation of detailed mitigation measures where equestrian receptors are of relevance (noise and air emissions from the sites, and transport and public right of way mitigation). This is to be secured through the agreement of Terms of Reference for the Community Liaison Group by Requirement 4 of Schedule 2 to the **Draft DCO [REP6-005]**. In terms of construction traffic, the level trip generation assessed in **ES Volume 1 Chapter 13: Transport and Access [REP4-014]** and **ES Volume 3 Appendix 13-1 Transport Assessment [REP6-014]** demonstration there will be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				no significant on delay or congestion on the local highway network.
SLD-052	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	• At §4.2.20, the Applicant suggests that "screening of noise sources within the construction area via the erection of temporary screens would be employed where practicable." SLD remains doubtful that such screening would be effective for newborn horses. Further information is sought in respect of the proposed acoustic fencing.	The Applicant confirms that noise screening is to be deployed as part of a range of measures to reduce noise from the Scheme. The Applicant refers to paragraphs 4.2.13-4.2.15 of the **Equine Business Report [REP5-105]** which recognises foals as being more reactive to noise and novel stimuli, but also identifies that this is not likely to cause disproportionate impacts to foals due to the calming presence of their mothers and because animals habituate to noise. BS 5228 Code of practice for noise and vibration control on construction and open sites advises that temporary screens can provide up to 10 dB reduction in noise levels.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				As such, the Applicant considers that this will provide a material contribution to reducing noise impacts from construction on foals in nearby facilities. The implementation of noise screening is secured via the **Outline Construction Environmental Management Plan [REP6-029]** by Requirement 13 of Schedule 2 to the **Draft DCO [REP6-005]**.
SLD-053	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	• At §4.2.20, the Applicant suggests that construction workers within the vicinity of equestrian facilities conducting noise will be briefed on "stopping work protocols in the event horses appear in distress or in danger." Clarity is sought as to who will be making this decision and on what basis, given this is a matter which requires equestrian expertise.	Construction workers are to be receive training from a suitably qualified Equine specialist(s). To ensure informed decision making and an initial judgement on if nearby horses appear in distress and escalate to the relevant team member as part of enacting stop work protocols. This will be confirmed in detail through the agreement of the Construction Environmental Management Plan (to be substantially in accordance with the **Outline CEMP [REP6-029]**) pursuant to Requirement 13 of Schedule 2 to the **Draft DCO [REP6-005]** to which Wiltshire Council

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				must approve before construction can commence.
SLD-054	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	• At §4.2.29, the Applicant suggests that "measures will be put in place to ensure driver behaviour and physical space provisions are suitable to ensure horse and rider safety is protected." SLD is not satisfied that this will meaningfully reduce risk to horses and their riders on roads. Given the narrowness of many of these roads, it is unclear where the Applicant will accommodate necessary safe areas or ensure a sufficient passing space between horses and vehicles.	As stated in Section 6.15 of the **Outline Construction Traffic Management Plan [REP6-041]** all delivery drivers will be briefed and reminded of the driving standards to which they should adhere around horses and riders as set out in the Highway Code, including waiting for direction from horse riders to reach passing places or points at which they can wait (such as field gates where appropriate). The **Outline Construction Traffic Management Plan [REP6-041]** furthermore provides outline detail of passing places that are committed to being built for the Scheme's construction to provide safe passing widths along roads which are currently not wide enough to pass in accordance with the Highway Code. The **Outline Construction Traffic Management Plan [REP6-041]** is secured by Requirement 15 of Schedule

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				2 to the **Draft DCO [REP6-005]** and a detailed final version must be approved by the relevant local highway authority (Wiltshire Council and South Gloucestershire Council).
SLD-055	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	2.5.22. It is acknowledged that the Applicant has carried out an initial consultation exercise, as reflected within the results provided in Table 2-10 of the Applicant's Tourism and Recreation Receptor Tables [APP-241], which purported to identify businesses and equestrian facilities within 5km of the Order Limits in early 2025. However, SLD also notes that the Applicant has carried out an updated consultation exercise for the purpose of preparing this technical note. In the first instance, SLD would welcome clarity on to whom the questionnaire was sent and how this relates to the map prepared at Annex A. Further, it is unclear on what basis the answers provided to that questionnaire shared have affected the Applicant's conclusions, or whether the Applicant	Questionnaires were sent to equine businesses (studs, liveries, riding schools, health services) as identified within the 5 km Study Area, and as set out in Annex A of the **Equine Business Report [REP5-105]**. This included those identified in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, and those who had provided representations and identifiable information to the examination so that the Applicant could include them in the updated study. Questionnaires were not sent to private facilities as the focus of the report was on impacts to equine businesses. Supporting services shown in Annex A are largely those identified through questionnaire responses, and so

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			intends to reassess businesses in light of the responses received.	themselves were generally not issued questionnaires unless already engaged with the DCO examination. The Applicant took questionnaire responses to understand the nature of business at each responders location, and to consider how the Scheme would impact upon them as a business (operationally, employment, and economically). Individual effects were not presented to retain anonymity and to reflect the questionnaire responses being a sample of the businesses within the 5 km Study Area. Questionnaire responses were also used to understand the scale and breath of the supply chain and supporting industries, as is shown by the locations identified within the wider 20 km Study in Annex A of the **Equine Business Report [REP5-105]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-056	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	2.5.23. It is also noted that SLD has provided a list of equestrian properties to the Applicant, as reflected in the layer of Appendix Z "equestrian properties" [AS019]. This is accompanied by a layer on "equestrian environment-riding routes." It appears to SLD that this information was not taken into account before producing the Equine Report.	The Applicant notes the version of **Appendix Z - Combined Baseline and Project Information Plan** that contained the "*equestrian environment-riding routes*" was not submitted to the examination until Deadline 6 **[REP6-082]** and therefore was not available to the Applicant for producing the **Equine Business Report [REP5-105]**. The Applicant was however able to access an image-based version of the data layer as submitted by January Farrington at Deadline 4 **[REP4-116]**. The Applicant found this helpful and indeed used this map to confirm the location of equine businesses sent questionnaires. However, some of the locations could not be verified by online searches or directories, hence them not being included. Private facilities were also only noted in text, particularly where it was noted by

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the Applicant that they were single paddocks attached to residences with no other supporting facility.
SLD-057	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	2.5.24. It is further unclear how APP-241, fits in with Annex A of the Equine Report, which provides an updated, longer, list of equine businesses and equestrian facilities. §6.1.14 explains that "in response to the Examining Authority's request for mapping, Annex A provides a map of equestrian facilities within the 20km study area, together with information on facility type, name, address and business activity." The column on the far right acknowledges that many of these businesses have not been assessed by the Applicant, including many of those which have been identified within 5km of the scheme. The Applicant has not provided any explanation as to why those businesses have not now been assessed at this stage, or why those businesses were missed in early 2025, during the initial consultation exercise. It	The inclusion of a comparison to **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** aims to demonstrate the extent to which the Applicant has taken on board local information presented to the examination by Interested Parties, and the information provided in response to questionnaires informing the **Equine Business Report [REP5-105]**. The Applicant does however seek to clarify that some of the locations within the 5 km Study Area were identified in June 2025 but not considered likely to experience any significant effects, and therefore were scoped out of further assessment in detail (see Table 2-10 **[APP-241]**). The identified business in Annex A therefore represent a robust catalogue of the equine business most likely to be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			is also notable that some businesses are still missing, including the Saddler in Malmesbury. In SLD's view, given the scale of the scheme, and the wide-ranging effects on equestrian businesses, it is reasonable to expect the Applicant to assess equestrian effects at a regional level – and certainly beyond 5km. Accordingly, SLD seeks clarification on whether any other businesses set out in Annex A will be consulted and assessed.	affected by the Scheme, while the returned questionnaire responses form an important sample of these, including the equine businesses most directly affected by the Scheme (Ladyswood Farm and Stud, Townleaze Farm, West Park Farm, and Park Farm – on the Cable Route Corridor). The Applicant does not consider that it is likely that any business not included in the **Equine Business Report [REP5-105]** would experience any greater level of effect than those identified.
SLD-058	Socio-Economics, Tourism and Recreation	REP5-105 – Equine Business Report	2.5.25. As indicated above, the business survey presently being progressed by SLD includes equestrian businesses. SLD has also consulted many of these businesses for further comment individually and by reference to what the Applicant has produced in APP-241 and Annex A of the Equine Business Report. SLD hope to produce a summary table of these comments for the Applicant's	The Applicant notes this comment and awaits the business survey produced by SLD for Deadline 7.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			review once consent has been obtained for their answers being shared.	
SLD-059	Scheme Description and DCO Process	REP5-013 – Draft DCO	2.6.1. SLD welcomes the change made at paragraph 18 of Schedule 14 (Arbitration Rules) which confirms that any arbitration hearing and documentation will be open and accessible by the public, which is what SLD proposed. As discussed in SLD's Deadline 5 Submissions, SLD accept that account may need to be taken of those cases for environmental protection in respect of which confidentiality might be required (such as badgers).	The Applicant notes this comment.

Table 3-8 Stop Lime Down – Comments on Responses to ExQ2 [REP6-081]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-060	Site Selection and Alternatives	ALT2.1	3.1.1. At Deadline 5, SLD submitted an additional note on site selection and the cable route [REP5-130, Appendix E]. SLD's case on site selection is further complemented by Appendix L of SLD's WR at Deadline 1 [REP1186] and Appendix 1 of SLD's Deadline 3 Submission [REP3-173]. Those submissions emphasise that PDA 10 has been uniquely privileged in its selection and assessment. SLD maintain that a proper approach to site assessment would have identified sites closer to the point of connection which would have been considerably less harmful, revealed the defects of PDA 10, and directed development away from the site.	The Applicant notes this comment. This point has been responded to within the Applicant's previous submissions on site selection including the **Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E Site Selection and Cable Route [REP6-064]**, which was submitted at Deadline 6. The Applicant maintains that its site selection assessment, as set out in the **Site Selection Assessment Report [APP-185]** meets the policy requirements regarding consideration of alternatives.
SLD-061	Site Selection and Alternatives	ALT2.1	3.1.2. The Applicant's response to ALT2.1 identifies PDA 10 as having an area of 729ha when all constraints are removed. The Applicant acknowledges that there was never any suggestion that	The Applicant notes this comment and refers to the submissions made regarding the clusters in the **Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			PDA10 would be combined with PDA 1, due to the substantial area of flood zone 3 between.	**Site Selection and Cable Route [REP6-064]**, which was submitted at Deadline 6. This clarifies the purpose of the exercise and how clusters were identified (see from paragraph 1.3.6).
SLD-062	Site Selection and Alternatives	ALT2.1	3.1.3. Critically, then, the Applicant's flawed approach has led to the selection of a PDA which is substantially smaller than the clusters which they have now identified (and only marginally larger than PDA 3 and PDA 12 considered individually). Evidently, if the Applicant had applied the approach adopted retrospectively in the Technical Note, Clusters 1, 2, and 3 would have been assessed and considered at an earlier stage – and constrained PDA10 would have been identified as being too small for the Scheme itself.	The Applicant does not agree that the approach to site selection as set out in its **Site Selection Assessment Report [APP-185]** is flawed. The methodology adopted does not seek to assess entirely unconstrained sites at stage 5 because this does not reflect the reality of site selection. It is acknowledged that sites are likely to have some constraints within them due to a variety of factors including land availability, land parcel size, how constraints are distributed etc (for instance, it is practically difficult to entirely remove BMV agricultural land if it is intermingled with non-BMV land). In reality, it is not always practicable to entirely remove constrained areas of land, and therefore instead, the Applicant assesses the identified PDAs against standardised assessment

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				criteria to determine the weight that should be given to those constraints identified within them. This approach is not novel (see other examples in **the Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E: Site Selection and Cable Route [REP6-064]**). Once a site is selected, the Applicant then goes through a process of design evolution and application of the mitigation hierarchy to avoid or reduce effects on the receptors within and surrounding the site. This is beyond the remit of the initial site selection process. The Applicant has considered clusters of unconstrained land at a later stage, however, this was done in response to SLD's submissions during examination, and does not mean that the Applicant's initial methodology as set out in the **Site Selection Assessment Report [APP-185]** is flawed. As set out in the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Technical Note on Site Selection Assessment [REP2-043] and confirmed in the **Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E: Site Selection and Cable Route [REP6-064],** the removal of all constraints from the PDAs has resulted in the inclusion of land parcels which may be too small and awkwardly shaped to incorporate solar infrastructure. In other words, complete removal of constraints can lead to oddly shaped land parcels that do not reflect the reality of site selection or the design evolution process that comes after initial site selection. In the context of the Scheme, where the mitigation hierarchy has been appropriately applied and the impacts of the Scheme have been fully assessed in the Environmental Statement, the Applicant considers its approach to site selection and consideration of alternatives to be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				reasonable, appropriate and proportionate.
SLD-063	Site Selection and Alternatives	ALT2.1	1.1.2. SLD has requested at Deadline 5 that the Applicant provide a map in a similar format to that at Figure 4-6 of [REP2-043] so that some further insight into the removals from PDA10 can be understood. SLD hopes that this will be provided by the Applicant at Deadline 6.	The Applicant has provided the map as an annex to the **Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E Site Selection and Cable Route [REP6-064].**
SLD-064	Site Selection and Alternatives	ALT2.2	3.1.4. SLD maintains that the Applicant's approach is methodologically flawed and fails to apply a consistent methodology to (i) the selection of PDAs and (ii) to the assessment of clusters. SLD repeats the points made in Appendix L of SLD's WR at Deadline 1 [REP1-186] and Appendix 1 of SLD's Deadline 3 Submission [REP3173].	The Applicant has addressed SLD's concerns regarding methodology in the **Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E Site Selection and Cable Route [REP6-064].** In summary, the Applicant maintains that its approach meets the requirements to consider alternatives and is proportionate, in line with NPS EN-1 paragraph 4.3.22.
SLD-065	Site Selection and Alternatives	ALT2.2	3.1.5. Evidently, Clusters 1, 2, and 3, have not been assessed 'consistently' where they have not been assessed at all. To date, the Applicant still has not	The Applicant has addressed SLD's concerns regarding methodology in the **Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E Site Selection and Cable**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			conducted a RAG analysis in respect of Clusters 1, 2, and 3.	**Route [REP6-064].** In summary, the Applicant maintains that its approach meets the requirements to consider alternatives and is proportionate, in line with NPS EN-1 paragraph 4.3.22.
SLD-066	Site Selection and Alternatives	ALT2.2	3.1.6. SLD notes that Table 2-2-1 of its response purports to retrospectively explain why Clusters 1, 2, and 3 would have been discounted in any event, repeating points already made in the Applicant's Technical Note for Site Selection [REP2-043]. While it observes that Clusters 1, 2, and 3 experience cultural heritage constraints, it fails to consider the scope for additional mitigation and buffer land within the clusters given their larger land masses. Likewise – as acknowledged by the Applicant, similarly significant cultural heritage constraints are experienced within PDA10, albeit with less scope for mitigation.	This point is addressed in the **Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E Site Selection and Cable Route [REP6-064]** (see paragraph 1.3.10).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-067	Site Selection and Alternatives	ALT2.2	3.1.7. Nor is it a satisfactory reason to discount the clusters on the basis that initial approaches with landowners "revealed a lack of opportunity to accommodate the scheme" – given the power to compulsorily acquire such land under the DCO.	As set out in the **Site Selection Assessment Report [APP-185]** (paragraph 2.6.2), it is desirable to compile a site in as few landownerships as possible and minimise legal complexities and project costs. Land agents therefore used their professional knowledge to provide details of potentially willing landowners with large scale land holdings within the 20 km search area. This was one of the factors considered in site selection, but not the only factor, and each PDA was assessed against a number of assessment criteria as set out in Annex D to the **Site Selection Assessment Report [APP-185]**. With regard specifically to the clusters identified in the **Technical Note on Site Selection Assessment [REP2-043],** the Applicant clarifies that none of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				clusters were discounted solely on the basis of landowner willingness (cultural heritage was the main reason for discounting all three clusters). Please also note the comments in the **Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E Site Selection and Cable Route [REP6-064]** which note that, although cultural heritage constraints were identified during a high-level review, further work would be required to fully understand the overall suitability of the clusters.
SLD-068	Site Selection and Alternatives	Table 2-2-2	3.1.8. In respect of Table 2-2-2, SLD does not accept the RAG analysis which has been presented in respect of PDA10. At a minimum, cultural heritage, access for construction traffic, and landscape should be assessed as red.	The Applicant has responded to these concerns in its **Response to Written Representations [REP2-039]** (see to SLD-046, which deal with landscape and visual and access to construction traffic). With regard to cultural heritage, the Applicant notes that SLD previously agreed with the rating of amber for cultural heritage for PDA10 (see

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Appendix C of SLD's **Written Representation, Appendix L (Site Selection and Alternative Sites Assessment) [REP1-186]**) and therefore the Applicant did not provide comments in its response to SLD's written representation. In any event, the Applicant maintains that a rating of amber is appropriate and reflects that there are no listed buildings or conservation areas within the PDA boundary, but to acknowledge that there are heritage assets outside of the PDA boundary (e.g listed buildings within 500 m, conservation areas within 500 m and scheduled monuments within 2 km).
SLD-069	Site Selection and Alternatives	ALT2.2	3.1.9. SLD awaits additional comment from the Applicant on its Deadline 5 submission, to which a response will be provided at Deadline 7. Ultimately, the Applicant's responses remain no answer to the procedural issues which SLD have flagged in its earlier submissions. SLD would welcome an ISH on	The Applicant has provided a response in the **Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E Site Selection and Cable Route [REP6-064].**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Alternatives for these issues to be ventilated.	
SLD-070	Site Selection and Alternatives	ALT2.3	3.1.10. SLD have addressed this point within Appendix E of their Deadline 5 submission (pp. 162-223) [REP5-130]. In order to get a better understanding of how Lime Down compares with similar NSIP projects, SLD has analysed the solar proposals currently listed on the Planning Inspectorate's website. Appendix E demonstrates that the Scheme is an outlier when compared to other Schemes of a similar type. SLD considers that the significant length of the cable route, far in excess of other schemes, explains some of the particularly harmful aspects of the Scheme.	The Applicant has provided a response in the **Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E Site Selection and Cable Route [REP6-064].** The Applicant has noted some discrepancies in SLD's quoted cable route corridor lengths (as provided in Appendix E of SLD's deadline 5 submission **[REP5-130]** and has provided examples of other projects with broadly comparable cable route corridor lengths to the Scheme in its response **[REP6-064]**. It appears that the discrepancy is a result of SLD measuring from the point of connection to the on-site 400kV substation, which is the shortest measurement and misrepresents the length of the corridor.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Whilst the Applicant acknowledges that it is difficult to adopt a standardised approach because the layout of all schemes differs, SLD's methodology does not capture the length of cable route where solar sites are more separated and require longer stretches of cable route corridor between them (for instance, Light Valley Solar). Regarding all the cable route corridors quoted by SLD, the Applicant disagrees with SLD's figures in relation to the following schemes (references to the documents in the following bullets relate to documents for the relevant project): 1. Tween Bridge Solar Farm – Not agreed at zero as the point of connection is not yet confirmed and the cable route corridor does not form part of the scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				2. Fenwick Solar Farm – not agreed at zero or 1.5km. the Grid connection corridor is approximately 6.3 km between the on-site substation to the Thorpe Marsh substation, with optionality for a connection into overhead lines which would negate the need for the cable route corridor (see ES Chapter). 3. East Pye Solar – not agreed at zero. A new National Grid substation is proposed within Sub-Site 1b, however, there is approximately 24 km of cable route corridor required to connect the separated solar PV sites (see ES Chapter 3 and figure 4.1 Indicative Masterplan). 4. One Earth Solar Farm – not agreed at 3 km. There are multiple cable routes to join separated parcels together.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Whilst the cable route between the closest solar PV and the point of connection is around 3 km, the furthest distance between two points within the order limits is around 15.5km (see Design Approach Document paragraph 144). 5. Light Valley Solar – not agreed at 4.9 km. The cable route corridor is 23.9 km when measured from solar development site 1 to the point of connection (ES Chapter 2). 6. West Burton Solar Project – not agreed at 9.9 km. The distance is 21.28 km between West Burton 1 and the point of connection (ES Chapter 4). 7. Green Hill Solar Farm – not agreed at 11 km. The distance is

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				31 km from Green Hill A at its most northern extent to Green Hill G at its southernmost point (ES Chapter 4). Cottam Solar Project – not agreed at 13.3 km. The distance is 27.5 km from Cottam 3a (being furthest away) to the point of connection (ES Chapter 4).
2SLD-071	Site Selection and Alternatives	ALT2.4	3.1.11. ALT2.4 The Applicant's response explains that situating the BESS Area at the Land at Melksham Station would have caused adverse effects on the character of Whitley, local PROWs, an adjacent Roman Road, and four Grade II listed buildings nearby.	During the initial constraints mapping as part of the Scheme, it was identified that locating BESS in fields directly to the north of Whitney had the potential to cause significant effects to nearby Listed Buildings. Furthermore, the field considered at this location are located on a slope overlooking the village of Whitley, which means that there would have been limitations to the application of landscape mitigation measures aimed at screening proposed infrastructure.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Consequently, heritage constraints, along with other environment constraints, caused the removal of BESS at this location.
SLD-072	Site Selection and Alternatives	ALT2.4	3.1.12. That response would be satisfactory – save that the current location of the BESS has similarly adverse effects given its proximity to a Roman Road (the Fosse Way), multiple listed buildings (including the Grade I listed building, Bradfield Manor), multiple PROWs and the villages of Hullavington and Norton.	**ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**, supported by appendices in Volume 3 (12-1 to 12-7) **[APP-219 to APP-232]** has assessed the potential impact of the Scheme on heritage assets adjacent to the proposed location of BESS in Lime Down D. No significant residual effects have been identified. **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-212]**, identified that there would be a moderate / minor (not significant) adverse effect to the Grade I Listed Bradfield Manor (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Following advise provided by Historic England panels in Field D5 were set back away from Grade I Listed Bradfield Manor and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. There will be no direct impact to the Fosse Way Roman Road. **Appendix 12-1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				significant effects were identified to the asset within **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**.
SLD-073	Site Selection and Alternatives	ALT2.4	3.1.13. SLD would welcome the Applicant confirming its estimate of the cost of its 400kV connection to the National Grid substation at Melksham.	As set out in Section 2 of the **Grid Connection Statement [APP-270]**, The Applicant has secured a grid connection agreement with National Grid Electricity Transmission Plc. Alongside this secured agreement, the Applicant has been providing and maintaining the necessary ongoing financial securities to fulfil its contractual obligations under the agreement with National Grid. While the final costs for these works will be determined at a later stage following detailed design and procurement, the Applicant provides full assurance that, in addition to meeting all costs associated with the grid connection to date, as set out in the Grid Connection Statement, it has the necessary funds available to deliver the Scheme in full, including the connection costs at the existing 400kV Melksham Substation.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-074	Cultural Heritage	CH2.8	3.1.14. The ExA's question asks whether the Applicant could confirm if there will be "less than substantial harm" to Avil's Farmhouse if the Applicant accepts Stop Lime Down's conclusion of a negligible adverse effect. The Applicant's response does not answer the question. It repeats that it welcomes SLD's conclusion but then concludes that there will be "no harm" to the grade II asset. If the Applicant agrees that there is a negligible adverse effect, it follows that there would be, at least, less than substantial harm.	See response to CH2.8 in **Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]**. The Applicant has identified that will be no harm to the Grade II Listed Avil's Farmhouse (see **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**).
SLD-075	Ecology and Biodiversity	EB2.3	3.1.15. Mr. Valori welcomes the Applicant's clarification that targeted surveys for riparian mammals will be undertaken two months prior to the commencement of works. However, clarification is sought as to whether the Applicant intends to carry this out as: • A set of two visits, with the second visit being two months from works commencing;	The Applicant notes Stop Lime Down's comment and confirms that pre-commencement inspections for riparian mammals will comprise a single visit carried out two months prior to work commencing, unless further surveys are deemed appropriate (for example, where limitations are identified during the initial survey, as set out within the response to SLD1-045 in the **Applicant's Response to**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• The first visit being two months prior and the second being carried out on the day of the works; • A single visit, two months from works commencing.	**Submissions Received at Deadline 4 [REP5-098]**). The Applicant notes that this approach to pre-commencement surveys has been agreed with the Environment Agency, as per their responses on Action 25 in the Environment Agency's **Comments on Any Submissions Received at Deadline 5 [REP6-074]**. This position will be reflected in the Statement of Common Ground which will be provided at Deadline 8.
SLD-076	Ecology and Biodiversity	EB2.3	3.1.16. Mr. Valori notes that a standard survey method for water vole presence/absence is generally two inspections between March – October inclusive, with inspections being at least two months apart.	The Applicant notes Stop Lime Down's comment. Pre-commencement checks for water vole will be undertaken as detailed in response to SLD-075 above.
SLD-077	Ecology and Biodiversity	EB2.5	3.1.17. Mr. Valori agrees with the position expressed by Wiltshire Council in respect of white-clawed crayfish. The Applicant's commitment to a 8-15m buffer at all watercourses, while	The Applicant notes Stop Lime Down's comment and maintains the position set out in response to Wiltshire Council's comments on Question EB2.5a and EB2.5b, provided within the **Applicant's**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			welcome, does not address ecological impacts where the Applicant purports to construct a new circa 6m wide permanent access for culverts across 'wet' ditches at Lime Down D, where suitable habitat for white-clawed crayfish exists has been assumed at one of the crossings. An assumption of species presence cannot preclude consideration of whether a mitigation licence is required to permit the works.	**Response to Submissions Received at Deadline 5 [REP6-060]**.
SLD-078	Ecology and Biodiversity	EB2.5	3.1.18. SLD maintains its position that a white-clawed crayfish survey should be carried out ahead of works, given the exact location of the culvert is not confirmed yet and the baseline information would help inform the final location of said culvert, as well as whether a licence is needed.	The Applicant notes Stop Lime Down's comment relating to white-clawed crayfish survey and licensing and has provided a response on this matter in response to SLD-058 in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.
SLD-079	Ecology and Biodiversity	EB2.8	3.1.19. The Applicant has confirmed that pre-construction checks for ecological constraints (such as active nests) undertaken by a suitably qualified EcoCoW are the primary means relied upon for mitigating potential impacts	The Applicant notes Stop Lime Down's comment and refers to the responses provided at NE-004 to NE-011 in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**, which address the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			upon barn owls, nesting birds, and overwintering birds. Natural England observes that while a "precautionary assumption of species presence can be a legitimate assessment approach where sufficient information is available to identify suitable habitat and likely ecological constraints and … is supported by appropriately targeted avoidance and mitigation measures… for birds the acceptability of such an approach is particularly dependent upon the quality of the underlying evidence base." SLD agrees.	approach taken to establishing the ecological baseline and the subsequent development of the avoidance and mitigation measures incorporated into the Scheme.
SLD-080	Ecology and Biodiversity	EB2.8	3.1.20. SLD maintains its concerns in respect of the quality of the Applicant's evidence base for the CRC. Mr. Valori notes that the Applicant has relied upon habitat assessments and detailed surveys conducted within the Solar PV Sites to make assumptions in respect of species presence within the CRC. While this allows for the EcoCoW decisions to have some baseline to use as a basis, given that both Solar PV and CRC	The Applicant notes Stop Lime Down's comment and confirms that the baseline for the Cable Route Corridor (CRC) was additionally informed by local species records obtained from the Wiltshire and Swindon Biodiversity Records Centre for the CRC and the surrounding 500 m Study Area, supplemented by data from the British Trust for Ornithology. Corsham Lake is an ornamental lake located approximately 500 m northwest

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			habitats are primarily agricultural land, there are features around sections of the CRC that are not present around the PV fields, Corsham Lake being a notable example.	of the Cable Route Corridor at its closest point. The Study Area encompassed land within the Order Limits as well as land lying between the Order Limits and Corsham Lake, and therefore included records of flocks of wildfowl and other wetland bird species which use Corsham Lake and are also known to utilise the intervening farmland. As such, bird species associated with Corsham Lake, including those that may use habitats within the Cable Route Corridor and surrounding farmland, have been considered. The Applicant maintains that the baseline information used to inform the assessment of effects within the CRC, including on wintering birds, provided in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** is sufficiently robust. The Applicant refers to responses to Natural England on the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				assumption of bird species presence within the CRC provided at NE-004 to NE-011 in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.
SLD-081	Ecology and Biodiversity	EB2.8	3.1.21. In respect of pre-clearance searches, it is noted that for trees, a more in-depth inspection with an aerial harness may be required if there are potential knot holes/hollows within a tree to be cleared that are not visible from the ground level.	The Applicant notes Stop Lime Down's comment and confirms that further surveys of trees for the presence of protected and notable species will be undertaken if required, as set out within Method Statement 5 of the **Outline Ecological Protection and Mitigation Strategy [REP6-039]**.
SLD-082	Ecology and Biodiversity	EB2.8	3.1.22. In respect of waterfowl or wading birds, the Applicant states that the "order limits are not located in close proximity to large waterbodies, coastal habitats, estuaries or wetland areas where flocks of waterfowl or wading birds often exhibit strong site fidelity to communal winter roosts or foraging areas, and regularly utilise the same surrounding fields." Mr. Valori questions the validity of this statement. It should be noted that the Applicant bases its assessment of	The Applicant notes Stop Lime Down's comment and refers to the response provided in relation to SLD-080 above in relation to baseline data for birds relative to the Cable Route Corridor.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the wintering bird baseline on wintering bird surveys conducted within the Solar PV Sites, which showed primarily wintering passerines. However, the features adjacent to the Solar PV Sites are not the same as those near the CRC. For example, Mr. Valori notes that the CRC would cross near areas such as Corsham Lake, a large waterbody surrounded by a combination of grassland and woodland. There is no lake of this type within the vicinity of the Solar PV fields. As a consequence, the Applicant may be under-estimating the presence of waterfowl or wading birds near the CRC.	
SLD-083	Ecology and Biodiversity	EB2.8	3.1.23. Mr. Valori remains concerned in respect of the proposed mitigation approach for wintering birds being implemented to the extent proposed. Unlike with nesting birds, which have predictable timescales of a few weeks during which the chicks will fledge (that a developer can realistically prepare and work around), there is no guarantee that	The Applicant notes Stop Lime Down's comment and confirms that the measures for avoidance and mitigation of impacts to overwintering birds within the Cable Route Corridor are detailed within Method Statement 11 of the **Outline Ecological Protection and Mitigation Strategy [REP6-039]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			a wintering flock will move on or stay within a particular section of the CRC, even throughout a single day. SLD notes this can be particularly restrictive, and seeks clarification as to whether pausing works for a day, or potentially multiple days, will be the main mitigation measure to cope with the ecological constraint of nearby flocks in winter. If not, SLD queries whether (and, if so, what) additional factors would be used to determine whether a delay, reroute or simply proceeding in spite of presence is more appropriate. Would this be on a species-basis, such as its conservation status and sensitivity to disturbance, number of individuals observed, or other factors?	These measures include pre-commencement checks for flocks of wintering birds which, if present, will result in the postponement of works until the flocks have moved elsewhere. In implementing this approach, the Applicant confirms that consideration would also be given to the species present, including their conservation status and susceptibility to disturbance, as well as the nature and proximity of the proposed works and consideration of existing sources of disturbances, for instance routine agricultural practices. The Applicant considers this to be an appropriate and suitably precautionary approach to avoid and minimise potential impacts on wintering birds as far as is reasonably practicable, and acknowledges the potential for construction delays associated with the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				implementation of these measures where required. As set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]**, there is no identified risk of land within the Order Limits functioning as functionally linked land to sites designated for wintering birds. The Applicant therefore maintains that wintering farmland birds likely to occur within the Order Limits would generally be expected to exhibit a relatively loose association with individual fields, moving between suitable foraging areas in response to local conditions and the availability of resources. Accordingly, implementation of the proposed mitigation is anticipated to result, in most circumstances, in only short-term delays to works before birds relocate to alternative suitable habitat within the wider landscape

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-084	Ecology and Biodiversity	EB2.14	Seasonal Clearance 3.1.24. The Applicant's answer states that "*the Applicant does not consider it appropriate or necessary to commit to a blanket restriction on undertaking works outside of the optimal season (unless otherwise agreed) for all protected species assumed to be present within the Cable Route Corridor.*" The Applicant explains that "*committing to seasonal restrictions associated with all protected species (unless otherwise agreed) would not be proportionate, as the appropriate timing of works varies considerably between species, habitats and the nature of the activity being undertaken.*"	The Applicant notes Stop Lime Down's comment.
SLD-085	Ecology and Biodiversity	EB2.14	3.1.25. Fundamentally, the Applicant's response reveals the limits in its approach of assuming presence without undertaking a species-specific survey. In theory, an assumption of presence should oblige the Applicant to implement the mitigation measures necessary to avoid and/or mitigate the harm to the	The Applicant notes Stop Lime Down's comment and refers to previous responses on this matter to Question EB2.14 in the **Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			species as though it were actually there, e.g. limiting works to certain times of year. Instead, the Applicant purports to rely upon pre-clearance searches conducted by the Ecological Clerk of Works, without committing to seasonally restricted works which may be advisable to avoid impacts where priority species are present. Consequently, far from enhancing the level of ecological protection afforded to species on site, the approach of assuming presence reduces protection to a generic approach.	The Applicant does not agree that the approach to assumption of species presence reduces the level of protection afforded to sensitive ecological receptors, and maintains that the proposed avoidance and mitigation measures within the **Outline Ecological Protection and Mitigation Strategy [REP6-039]** are sufficiently precautionary to avoid and minimise potential impacts as far as is reasonably practicable.
SLD-086	Ecology and Biodiversity	EB2.14	Dormice – Seasonal Clearance 3.1.26. In respect of dormice, SLD note that the ExA records the Applicant as having committed to out of season works in relation to dormice in its SoCG with Natural England [REP4-063]. SLD agrees with the point raised by Wiltshire Council in response to EB2.14. There is a discrepancy between what the Applicant states in the SoCG and what	The Applicant notes Stop Lime Down's comment and refers to the responses provided to SLD1-187 and in relation to EB2.14 on this matter in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			is actually stated within the EPMS. Within the SoCG with Natural England, the Applicant has committed that "*proposed works align with recommended seasonal timings to avoid impacts to breeding or hibernating dormice or provide clear justification where non-standard timings are proposed.*" It should be noted that this does not restrict the Applicant from conducting works at seasonally inappropriate times – only when "clear justification" has not been provided.	
SLD-087	Ecology and Biodiversity	EB2.14	3.1.27. Within the EPMS [REP5-082], at Method Statement 13, the Applicant has stated (SLD's emphasis): "Where no signs of dormice or their nests are found within a particular section, vegetation clearance can progress under the supervision and direction of the EcoCoW via a single-stage clearance. This is appropriate for any time of year due to the relatively small sections of hedgerow requiring removal in any one location, meaning all areas can be	The Applicant notes Stop Lime Down's comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			comprehensively checked in accordance with Mammal Society guidance for finger-tip searching. In areas of dense vegetation, the EcoCoW may need to repeat the fingertip search as more areas become accessible, and it may be necessary to cut hedgerow to approximately 300 mm above ground level in the first instance to ensure that the hedgerow base is accessible and can be inspected by the EcoCoW prior to removal."	
SLD-088	Ecology and Biodiversity	EB2.14	3.1.28. SLD agrees with Wiltshire Council's observation that Natural England appear to be assuming that hedgerow removal will be sensitively and seasonally timed to avoid the dormouse breeding and hibernating season. However, Method Statement 13 (which is specific to dormice) does not stipulate any seasonally restricted works. Mr. Valori seeks clarification from Natural England as to whether it would be acceptable for works to take place which conflict with dormouse	The Applicant notes Stop Lime Down's comment seeking clarification from Natural England. However, and with reference to Method Statement 13 of the **Outline Ecological Protection and Mitigation Strategy [REP6-039]**, the Applicant notes that the Mammal Society guidance relating to seasonally restricted vegetation clearance is principally applicable to the removal of longer sections of continuous connected habitat, with single-stage clearance

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			clearance seasonality outlined within Mammal Society dormouse mitigation guidelines.	identified as appropriate for sections of up to 150 m in length. By comparison, habitat removal associated with the Scheme is substantially more limited in extent at any individual location, comprising up to 18 m of hedgerow removal for the provision of new site accesses from the highway network and up to 12 m for cable route installation works. As set out in Method Statement 13, the Applicant maintains that, due to the limited extent of habitat removal at any one location, affected sections can be comprehensively searched for dormouse nests prior to works commencing. The Applicant therefore maintains that the proposed approach is appropriate at any time of year and provides a proportionate means of avoiding impacts on dormice whilst

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				remaining consistent with the principles of relevant good-practice guidance
SLD-089	Ecology and Biodiversity	EB2.14	Dormice – Two Stage Clearance 3.1.29. Equally, Natural England appear to be assuming that two-stage clearance will occur generally for dormice. If that is the case, that assumption is incorrect. As set out above, the Applicant has only committed to two-stage clearances in some areas of dense vegetation. The Applicant justifies its approach on the basis that the habitat is not particularly suitable for dormice and the impacts on dormice are not extensive in size, implying that any mitigation other than pre-clearance searches will not be required.	The Applicant notes Stop Lime Down's comment and maintains the position set out in the Applicant's previous response to Stop Lime Down's comments on this matter in **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**, such that the proposed avoidance and mitigation measures for dormice within the **Outline Ecological Protection and Mitigation Strategy [REP6-039]** are sufficiently precautionary to avoid and minimise potential impacts to dormice as far as is reasonably practicable.
SLD-090	Ecology and Biodiversity	EB2.14	3.1.30. Mr. Valori would challenge all three of those assumptions. the majority of hedgerows and boundary features within the order limits have been defined by the Applicant as "ecologically important", historical records for species	The Applicant notes Stop Lime Down's comment and maintains that the assessment of potential impacts to dormice presented within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** represent a sufficiently

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			such as dormouse are present within habitats adjacent to the CRC and it crossing points, and even though the individual access gaps are small the length of the CRC and to a lesser extent its linear nature (which due to its need for two cuts at the entrance and exit of a field requires separating boundary hedgerows into two separate halves) do bring into question whether the extent of its short-term impacts are as small as they state.	accurate and robust assessment. It remains the Applicant's view that a sufficiently precautionary approach has been adopted within the assessment and the **Outline Ecological Protection and Mitigation Strategy [REP6-039]**, including the implementation of specific measures for dormice set out in Method Statement 13. The assessment has considered the overall extent, distribution and nature of habitat loss and fragmentation across the Scheme, including the linear nature of the CRC and the requirement for crossing points and access locations. The extent of habitat removal at any individual location remains limited, and the vast majority of hedgerows within the CRC will be retained. The Applicant therefore maintains that the temporary and localised nature of the proposed works, together with the avoidance and mitigation measures

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				secured through the **Outline Ecological Protection and Mitigation Strategy [REP6-039],** ensures that impacts on hedgerows, habitat connectivity and associated species, including dormice, have been appropriately assessed and can be effectively managed.
SLD-091	Ecology and Biodiversity	EB2.14	Dormice – Surveys 3.1.31. Finally, SLD notes Natural England's comments that "dormice surveys can be unreliable as they are very mobile species and their nests are temporary, therefore it is difficult to rely on surveys to avoid impacts during hedgerow removal." For the avoidance of doubt, SLD do not oppose a two-stage clearance approach during seasonal timings to avoid impacts on breeding or hibernating dormice. Mr. Valori agrees that a method statement for the removal of dormice habitat can be an effective means of avoiding impacts. However, SLD remain concerned that out of season work will	The Applicant notes Stop Lime Down's comment and maintains that the assumption of presence in suitable habitat represents a precautionary approach to establishing the ecological baseline. On this basis the avoidance and mitigation measures set out within the **Outline Ecological Protection and Mitigation Strategy [REP6-039]** have been designed to avoid and minimise potential impacts to dormice as far as is reasonably practicable. The Applicant therefore maintains that the proposed approach is appropriately

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			inevitably take place on a scheme of this size (given the many competing deadlines), in which case there will be further reliance on pre-clearance searches conducted by the EcoCoW without an adequately informed baseline.	precautionary and refers to its previous responses on this matter at SLD-061 in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.
SLD-092	Ecology and Biodiversity	EB2.14	3.1.32. While SLD acknowledge that even full surveys may not provide a complete picture (as with similar types of elusive fauna), the Applicant's approach currently hinges heavily on the EcoCoW's discretion for key mitigation decisions for all stages of construction. Even a basic dormouse survey would support the EcoCoW in identifying sections of hedgerow which are likely to see higher levels of activity – especially if a decision has to be made out of season on the day of works.	The Applicant notes Stop Lime Down's comment and refers to the relevant responses to SLD-086 to SLD-091 above.
SLD-093	Hydrology, Flood Risk and Drainage	FHW2.8	3.1.33. In its response to this question, the Applicant states that it does not consider a separate water management plan to be necessary, but considers that water management should be	The Applicant confirms its position set out in response to FHW2.8. Water management will be addressed through the detailed management plan

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			addressed through the detailed management plan applicable to each phase of the Scheme.	applicable to each phase of the Scheme, rather than through a single standalone Water Management Plan covering construction, operation and decommissioning. The activities, risks and controls differ between each phase and the detailed provisions are therefore appropriately developed at the stage when the relevant design, working methods and site conditions are known. The detailed plans are secured through the relevant DCO Requirements.
SLD-094	Hydrology, Flood Risk and Drainage	FHW2.8	3.1.34. SLD disagrees and reiterates the submissions made at Deadline 5. Given the importance of the Water Management Plan not only during the construction phase but throughout the lifetime of the project, it is not acceptable that it does not currently exist. Embedding disconnected sections in the other outline management plans	The Applicant does not agree that the phase-specific approach results in disconnected water management or prevents the relevant authorities from understanding the interaction between hydrology, soils, ecology and other environmental controls.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			prevents regulatory bodies from seeing water problems as a whole and risks missing significant interactions with soils, ecology, construction techniques, maintenance and decommissioning.	This matter was considered directly by Wiltshire Council as Lead Local Flood Authority in its response to FHW2.8. The LLFA confirmed that it does not consider a standalone certified Water Management Plan covering all phases of the Scheme to be essential and that retaining water management within the existing environmental management framework is acceptable, provided its scope and links with the other plans are clearly identified. The LLFA specifically stated that it was not seeking additional standalone management plans. The Applicant has responded to that request through the updated outline management plans. Water-related controls are now more clearly identified and cross-referenced across the **Outline CEMP [EN010168/APP/7.12]** (Revision 8), **Outline OEMP**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				[EN010168/APP/7.13] (Revision 8), **Outline SRMP [EN010168/APP/7.15]** (Revision 6), **Outline LEMP [EN010168/APP/7.18]** (Revision 5), **Outline EPMS [EN010168/APP/7.19]** (Revision 7) and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** (Revision 6). This reflects the different requirements of each phase. Construction water management needs to address matters such as temporary drainage, excavations, haul routes, stockpiles, sediment and pollution control. Operational requirements relate to permanent drainage, inspections, vegetation, erosion and maintenance. Decommissioning will require controls appropriate to the methods and conditions applying at that future time.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Preparing one detailed plan now to cover all of those circumstances would provide no additional environmental protection and would necessarily be less responsive to the detailed design and conditions applying at each phase. The LLFA's current position also confirms that the construction-phase drainage, runoff-management and water-quality framework is now substantially addressed. Its remaining concern relates to post-construction hydrological verification rather than the absence of a standalone Water Management Plan.
SLD-095	Hydrology, Flood Risk and Drainage	FHW2.8	3.1.35. A key example here may be the Applicant's oLEMP. Currently, the oLEMP states that "newly planted hedgerows shall be regularly watered in their first summer…" (§1.3.30) and "thereafter as required to ensure successful establishment" (§1.3.45).	The Applicant does not consider the watering of new planting to demonstrate a need for a standalone Water Management Plan covering the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Nothing else is said in respect of the frequency of water, nor how watering will be managed where the region experiences drought. SLD notes that the amount of water required for hedgerow is substantial and would need to be managed within a water management plan, given the extent of new hedgerow which the Applicant proposes to create. The same point applies in respect of the Applicant's other planting measures.	Watering is an establishment and maintenance requirement and is appropriately controlled through the detailed Landscape and Ecological Management Plan. The requirement to water planting during establishment is deliberately responsive to actual conditions. The frequency and quantity required will depend on factors including rainfall, temperature, soil moisture, species and the condition of the planting. A fixed watering rate prescribed at this stage would therefore be less appropriate than a requirement to provide sufficient watering to secure successful establishment. This approach also allows the maintenance regime to respond to periods of unusually dry weather or drought. Where additional watering is necessary to maintain successful

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				establishment, it will be provided through an appropriate authorised water supply. The Scheme does not rely on abstraction from local surface watercourses or groundwater to meet this requirement. Water-resource availability is considered separately through the **Outline Water Resources Strategy [APP-290]**, while the detailed LEMP will determine the watering and aftercare required for the final planting design. Wiltshire Council has previously raised the same point regarding early-years planting demand, and this was addressed in DCO2.1 at of the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**. The Applicant therefore considers that the existing framework provides the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				appropriate mechanism for managing planting water requirements without creating a separate lifetime Water Management Plan.
SLD-096	Consultation and Engagement	GCT2.6	3.1.36. SLD welcomes a requirement for incorporating a reporting mechanism within the outline OEMP to notify Wiltshire of "significant" replacement activities. SLD seeks clarity on the meaning of "significant" and invites the Council to identify those activities which may be significant replacement activities.	The Outline Operational Environmental Management Plan already provides at paragraph 2.13.4 that: *While panels are not anticipated to be replaced in a way that would not fall under either routine replacement or under the assessed wholesale replacement, including in a phased manner, the Applicant will notify the local authority* ***of any replacement of 10% or more of either the BESS units or Solar PV panels****.* On that basis, there is already a threshold on which notification is triggered and the Applicant does not consider that any further amendments are required.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-097	Consultation and Engagement	HW2.1	3.1.37. SLD agrees with the response set out by Wiltshire Council to this question, which it considers appropriately identifies the valuable points arising out of the SGD and the appropriate role for the CLG. In particular, SLD supports Wiltshire Council's proposal that community representatives receive appropriate training and support to help them understand the project and fulfil their community facing role. Members should not, however, be expected to manage communications or technical issues on behalf of the Applicant.	The Applicant agrees that community representatives serving on the Community Liaison Group should not be expected to manage communications or technical issues on behalf of the Scheme, as primary responsibility for communications and project delivery rests with the Applicant or "Undertaker" as per the current drafting. The Community Liaison Manager (CLM) appointed by the Applicant will serve as the lead administrator and key communications link between the public and on-site managers, taking responsibility for organising meetings, issuing technical information, and handling enquiries. With respect to training and support for group members, the Applicant confirms that the specific duties and expectations of participants will be clearly set out when recruitment opens via the project website. The extent to which project briefings, training, and additional support are provided to community representatives

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				will be agreed with Wiltshire Council through the approval of the detailed Terms of Reference for the Community Liaison Group pursuant to Requirement 4 of Schedule 2 to the draft **Development Consent Order [REP6-005]**
SLD-098	Consultation and Engagement	HW2.1	3.1.38. The Applicant's response suggests that the CLG will function as an "information giving forum." SLD hopes that the CLG's role will go beyond this and facilitate opportunities for genuine collaboration and an ability to influence outcomes (as recommended by the SGD).	The Applicant notes these comments and the representations made in ISH-9 by SLD's team. A draft of the Outline Terms of Reference for the CLG were provided to SLD and Wiltshire Council following this hearing.
SLD-099	Consultation and Engagement	HW2.1	3.1.39. SLD has not seen a copy of the draft Terms of Reference for the CLG which was sent to Wiltshire Council on 4th August 2026. SLD would welcome having sight of this document, so that it can offer input from a community perspective.	A copy of the draft Outline Terms of Reference was shared on 30 Septmeber with Wiltshire Council and Stop Lime Down with feedback received and considered prior to submission at Deadline 7

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-100	Consultation and Engagement	HW2.1	3.1.40. SLD awaits a response from the Applicant in respect of its proposal that there should be a separate CLG for the cable route during construction, so that councils local to it could be involved. This would also relieve the burden on CLG members and parish councils near the solar PV sites.	The comments are noted . See response to SLD-099
SLD-101	Ecology and Biodiversity	LV2.1	3.1.41. SLD notes Natural England's comment on LV2.1 that "the habitat creation measures proposed as part of the scheme are in themselves highly significant" and can take "many decades to achieve their full ecological potential." Mr Valori notes and echoes Natural England's concern that the enhancements proposed would be ultimately removed at decommissioning, so the duration of the benefit within the context of the wider landscape is ultimately temporary. This is coupled with the amount of time it may take for a lowland meadow habitat to establish; even in a best-case scenario under optimal management present	The Scheme is proposed on a temporary basis. The Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. As such, the Scheme would be required to be decommissioned and the land returned to landowner control and any subsequent management, alteration or removal of habitats established as part of the Scheme would be subject to, and undertaken in accordance with, the relevant environmental legislation and regulatory requirements in force at that time.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			assumptions expect a timescale of over a decade to reach this target, with on-site habitats likely to be more transitional neutral or calcareous grassland habitats during that time. The full, stated ecological benefits may therefore only exist for a shorter period of time.	The Applicant refers to the Applicant's relevant responses (NE-017 to NE-023) to Natural England on this matter in the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060].**
SLD-102	Landscape and Visual	LV2.5, LV2.6, LV2.7	3.1.42. Further comment by SLD's landscape expert on LV2.1 is set out in Appendix A below. LV2.5, LV2.6, LV2.7 - Ms. Carly Tinkler's comments on responses to this question by the parties are set out in Appendix A below.	The Applicant notes this comment and has responded to Appendix A below.
SLD-103	Other Environmental Matters - Glint and Glare	LV2.10	3.1.46. SLD welcomes confirmation that the Applicant has now contacted the operator of Badminton Airfield. This is consistent with current CAA safeguarding guidance, which expects engagement with affected airfields. The fact that the airfield had not previously made representations should not be taken to mean that the predicted glare is	The Applicant notes this comment. The yellow glare has been deemed acceptable due to considerations of the specific glare scenario; importantly, yellow glare is only predicted towards the visual circuits, and not the approach

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			acceptable. The Applicant concludes that the yellow glare can be operationally accommodated. SLD considers that this conclusion should be confirmed through consultation with the airfield operator and consideration of how the predicted glare may affect its operations.	paths which are the most sensitive receptor.
SLD-104	Other Environmental Matters - Glint and Glare	LV2.11	3.1.47. SLD accepts that the former FAA/Sandia methodology is widely used internationally and provides a useful way of classifying the intensity of predicted solar reflections. The concern is not its use. The concern is relying on it alone to determine whether the predicted glare is acceptable in the UK.	The Applicant acknowledges that the FAA 2013 guidance is not formally applicable in the UK, but this remains the most relevant international guidance relating to the effect of glint and glare on aviation receptors.
SLD-105	Other Environmental Matters - Glint and Glare	LV2.11	3.1.48. The Applicant relies on the fact that the former 2013 FAA interim guidance does not set a duration limit for green glare. However, this guidance was developed for a specific US purpose and has since been replaced. It should not be considered in isolation from current UK CAA guidance or from the way the affected airfields actually operate. The	The principle of the green/yellow threshold is to define a boundary at which glare has the potential to significantly affect a pilot. The Sandia study, which the 2013 FAA guidance was based on, sets this as a threshold of 1 second of after-image.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			fact that there is no numerical duration limit does not mean that duration, frequency and cumulative exposure are irrelevant.	The green glare category is made up of anything below this threshold, which could be of a very low intensity where there is no risk to looking directly at the panels; as such the duration of green glare is not a relevant consideration as it is not likely to present a hazard.
SLD-106	Other Environmental Matters - Glint and Glare	LV2.11	3.1.49. Pager Power's own guidance supports this point. It identifies duration, timing, intensity and the length of approach affected as matters that should be considered when assessing aviation glare. It also calls for a pragmatic assessment of whether a reflection may present an aviation hazard.	The Applicant has applied this where relevant, particularly with relevance to the glare scenario at Badminton Airfield, where yellow glare is predicted only towards the visual circuits. When the intensity is green, it is considered that there is a very low potential for hazard and therefore detailed consideration of duration, timing and location of glare is not required.
SLD-107	Other Environmental Matters - Glint and Glare	LV2.11	3.1.50. The concern at Lime Down is the scale of the development and the cumulative effect from multiple arrays. More than 12,000 minutes of predicted green glare on visual approaches cannot, in SLD's view, be dismissed	As stated in the previous responses, green glare is considered acceptable based on there being a very low potential for hazard. As such, the duration or spread of the effects is not a key factor, as there is no indication that

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			simply because each individual reflection falls within the green category. SLD is not saying that green glare is automatically unacceptable. The point is that the Applicant has not yet demonstrated that the duration, spread and cumulative effect of the glare are acceptable for these airfields. Given the scale of Lime Down, this requires a more detailed operational assessment and direct engagement with the affected airfield operators.	increased durations of low intensity glare towards aviation receptors would impact safety.
SLD-108	Other Environmental Matters - Glint and Glare	LV2.12	3.1.51. SLD notes the Applicant's statement that the Pager Power guidance was developed following consultation with National Highways and Network Rail. This appears to go further than the guidance itself, which describes the document as a methodology recommended by Pager Power and developed from its own assessment experience.	Specific details within the guidance, relating to receptors (i.e. height and placement) were determined following consultation and form part of the guidance. The specific assessment methodology was developed by Pager Power based on assessment experience and stakeholder feedback.
SLD-109	Other Environmental Matters -	LV2.12	3.1.52. This was also discussed directly with Pager Power. During that meeting, Pager Power did not state that its	The Applicant notes this comment and agrees that Pager Power's guidance has not been formally validated, however

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Glint and Glare		guidance had been developed through a formal consultation or validation process with the relevant authorities. The discussion was that the guidance had been developed from Pager Power's experience and had been used on numerous projects. These are different points. Engagement on individual projects is not the same as formal consultation on, or endorsement of, the guidance itself.	would note that neither has any other guidance in this area. Nonetheless, Pager Power's experience, and the use of Pager Power's guidance on many consented projects internationally, including those consented by the development consent order process which have been subject to scrutiny by the Planning Inspectorate, is relevant in terms of determining that there is a precedence of acceptance for Pager Power's methodology.
SLD-110	Other Environmental Matters - Glint and Glare	LV2.12	3.1.53. The same applies to projects that may have been accepted by National Highways, Network Rail or other bodies. Approval of a project where the Pager Power methodology was used does not mean that the authority has formally endorsed that methodology. Likewise, extensive use of a methodology does not, by itself, amount to independent validation.	The Applicant notes this comment and has addressed this matter in the above response.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-111	Other Environmental Matters - Glint and Glare	LV2.12	3.1.54. There is a further issue. The Fourth Edition of the Pager Power guidance dates from September 2022 and predates the latest CAA CAST safeguarding guidance. It therefore cannot be treated as representing the current CAA position. SLD considers the Pager Power guidance to be a useful assessment tool, but not the sole basis for deciding whether the effects are acceptable. For a development the size of Lime Down, the assessment should also consider current guidance, the actual operating environment, cumulative effects, human factors and the views of the affected aviation, road and rail stakeholders.	The Applicant acknowledges that the CAST safeguarding guidance from early 2024, including CAST Advice Note 5, which relates to renewable energy developments. Nothing within this advice note contradicts Pager Power's guidance, and therefore there is no conflict between these two documents. The Applicant has considered current guidance, including CAST Advice Note 5, the operating environment and other relevant factors in the **Glint and Glare Study [APP-261]** where relevant.
SLD-112	Other Environmental Matters - Glint and Glare	LV2.13	3.1.55. SLD notes the Applicant's statement that Pager Power has compared its internal software with ForgeSolar and found the results to be "very similar". This is new information and is relevant to the question of software validation. However, no comparative results have been provided.	The Applicant has agreed to submit a sample of modelling comparisons between the two models, showing the similarity of outputs; using a different model for the assessment would not be expected to change the outcome of the assessment in any way.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				All modelling inputs and outputs are available within the **Glint and Glare Study [APP-261]** and **Glint and Glare Modelling Outputs [REP3-137 and REP3-138]**.
SLD-113	Other Environmental Matters - Glint and Glare	LV2.13	3.1.56. This point was specifically discussed at the meeting between SLD and Pager Power on 25 June 2026. SLD asked whether Pager Power's own software had been independently validated. Pager Power confirmed that it had not. It stated that the software had instead been validated through its use on numerous assessments. Pager Power also confirmed that its own software had been used for Lime Down rather than ForgeSolar. During that discussion, no mention was made of comparative testing against ForgeSolar or any other independently developed software.	The Applicant has utilised Forge Solar for modelling aviation receptors. Pager Power's internal model has been used for all receptors, including aviation receptors (where both models are used). Pager Power has also compared its software to Forge Solar in the past, through internal testing rather than external validation. It is understood that this is standard practice, and the Applicant is not aware of formal validation being undertaken for other models.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-114	Other Environmental Matters - Glint and Glare	LV2.13	3.1.57. The Applicant now states that a comparison with ForgeSolar has been undertaken and that the results are "very similar". If the Applicant wishes to rely on this comparison as evidence that the Pager Power software is reliable, SLD considers that the comparison should be provided. This should show when it was undertaken, what was compared and the results. Simply stating that two sets of results are equivalent is not the same as independent validation.	The Applicant notes this comment but does not intend to introduce additional evidence. The Applicant holds that the submitted evidence and Pager Power's experience is sufficient to provide confidence as to the Glint and Glare modelling.
SLD-115	Other Environmental Matters - Glint and Glare	LV2.13	3.1.58. There is a simple distinction here. Software being used many times shows experience in using it. It does not show that the software itself has been independently checked. This is particularly relevant where Pager Power developed the software, undertook the modelling and then assessed the results using its own guidance.	The Applicant notes this comment and has responded to the relevant issues above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-116	Other Environmental Matters - Glint and Glare	LV2.13	3.1.59. SLD is not suggesting that the Pager Power software is necessarily wrong. The concern is that the results should be capable of being checked. This is particularly important for Lime Down because of the size of the development and the number of aviation, road and rail receptors considered.	The Applicant notes this comment and has responded to the relevant issues above.
SLD-117	Other Environmental Matters - Glint and Glare	LV2.13	3.1.60. Even if the ForgeSolar comparison confirms that Pager Power's software predicts the same solar reflections, that only addresses the modelling. It does not validate how Pager Power then decides whether those reflections are acceptable. That assessment still needs to consider duration, frequency, cumulative and multi-directional effects, the type of receptor, the operating environment and human factors.	The Applicant notes this comment and has responded to the relevant issues above.
SLD-118	Other Environmental Matters -	LV2.13	3.1.61. SLD therefore considers that the Applicant's response does not fully answer the validation question. If	The Applicant notes this comment and has responded to the relevant issues above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Glint and Glare		comparative analysis with ForgeSolar is being relied upon, the results should be provided so that the comparison can be independently reviewed.	
SLD-119	Noise and Vibration	NV2.2	3.1.62. The Applicant has treated the data collected at LT8 as being representative of these receptors. However, given the uncertainty arising from the differing locations and the limited sampling period represented by the measurements, a precautionary approach should be adopted. In particular, the assessment should give greater weight to the lower background sound levels recorded at LT8, rather than relying on central tendency measures such as the median, in order to avoid understating the potential noise effects at these receptors.	This point has already been raised and responded to in item SLD1-099 of the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.
SLD-120	Noise and Vibration	NV2.3	3.1.63. SLD's position remains that the proposed approach does not adequately account for the context of a very quiet receiving environment.	This has been responded to several times throughout examination, for example, item SLD-016 of the **Applicant's Response to**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Submissions Received at Deadline 3 [REP4-082].
SLD-121	Noise and Vibration	NV2.3	3.1.64. The use of a fixed threshold risks masking the degree to which operational noise would exceed the prevailing background sound level. The assessment may therefore imply that the proposed noise would be of a similar magnitude to the existing acoustic environment, when, during quieter evening and night-time periods, the operational noise would be significantly above the prevailing background levels.	This has been responded to several times throughout examination, for example, items SLD1-102 and SLD1-106 of the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.
SLD-122	Noise and Vibration	NV2.3	3.1.65. The research referenced by the Council in support of the proposed sleep disturbance thresholds relate to maximum noise events associated with aircraft noise. Similarly, the internal noise level guidance within BS 8233 is derived principally from research into long-term health effects and is primarily concerned with transportation noise sources.	This has been responded to in item SLD1-107 of the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-123	Noise and Vibration	NV2.3	3.1.66. Neither provides a direct basis for concluding that continuous or intermittently audible industrial noise at the proposed levels would be acceptable in the particular circumstances of this case, or that the receptors would not experience annoyance and resultant disturbance to sleep.	This has been responded to in item SLD1-107 of the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.
SLD-124	Noise and Vibration	NV2.3	3.1.67. The proposed SOAEL thresholds, which represent the Applicant's committed operational targets, could result in industrial noise being audible within residential properties and, particularly where background sound levels are very low, potentially difficult to avoid or disregard. The audibility and character of the noise are therefore important considerations which are not adequately addressed by reliance on an absolute internal noise threshold alone.	This has been responded to several times throughout examination, for example, items SLD1-101 and SLD1-102 of the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.
SLD-125	Noise and Vibration	NV2.3	3.1.68. The Applicant has previously sought to characterise the predicted	This is a misrepresentation of the context of the analogy, which was with

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			noise as being comparable to that of a domestic refrigerator. However, this comparison is not necessarily reassuring. Domestic refrigerators are not normally located within bedrooms precisely because, in a quiet environment, their operational noise can be readily audible and potentially disturbing or annoying. The relevant issue is therefore not simply the absolute noise level, but the audibility, character and persistence of the proposed industrial noise within an otherwise very quiet environment.	respect to external noise, and has been clarified in item SLD1-109 of the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.
SLD-126	Noise and Vibration	NV2.4	3.1.69. In light of the ExA question and the Applicant's updates to mitigation and assessment, we would like to highlight that the number of receptors considered in the assessment does not represent the actual number of noise sensitive dwellings affected. In particular, receptor R16 is a proxy for the entire village of Norton, which contains numerous dwellings. Thus, the actual	Selected receptors represent reasonable worst-case locations. In respect of the village of Norton, not just R16 but also R42, R43 and R44, as shown in **Figure 14-1 Noise Monitoring and Sensitive Receptor Locations [APP-159]**, represent sections of the village closest to the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			number of high sensitivity receptors is much larger than indicated.	
SLD-127	Noise and Vibration	NV2.4	3.1.70. A key criticism of the Applicant's response is that it applies the concept of sustainability selectively and in a logically inconsistent manner.	The concept of sustainability has been applied logically and consistently. All receptors between LOAEL and SOAEL have been considered individually and against the same criteria. Where mitigation would lead to noticeable reductions in sound levels it has been applied. It is not considered reasonable to apply mitigation where it would not provide a material reduction in noise at nearby sensitive receptors.
SLD-128	Noise and Vibration	NV2.4	3.1.71. The Applicant accepts that a number of receptors would experience operational noise levels between the LOAEL and SOAEL and acknowledges that the second aim of the Noise Policy Statement for England requires adverse effects to be mitigated and minimised where reasonably practicable.	This is correct, although the Applicant would add that mitigation should also be considered within the context of sustainable development (i.e. a holistic approach should be taken) and that the Noise Policy Statement for England clarifies that "*This does not mean that such adverse effects cannot occur*".

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-129	Noise and Vibration	NV2.4	3.1.72. However, it then argues that additional attenuation should not be provided at several locations because silencers would either provide only limited benefit or would create maintenance and operational burdens, and therefore would not align with sustainable development.	This is a misrepresentation of the approach. It is not the case of either / or. The Applicant is not applying mitigation where it would provide no noticeable benefit due to a combination of the negligible impact on residential amenity as set against the operational burden.
SLD-130	Noise and Vibration	NV2.4	3.1.73. The Applicant's argument appears to imply that because further mitigation may require ongoing maintenance, operational intervention, or could affect plant performance, it can be discounted as "unsustainable".	Crucially, only in cases where there is no noticeable benefit to be set against such burdens. In these instances, it is indeed not within the context of sustainable development to adopt further mitigation.
SLD-131	Noise and Vibration	NV2.4	3.1.74. If accepted, that logic could be applied equally to almost any mitigation measure. It would mean that the presence of attenuation at some locations somehow justifies not providing attenuation elsewhere. That is not a rational basis for assessing whether impacts have been reduced as far as reasonably practicable. Each	The Applicant agrees that each source and each affected receptor should be considered on its own merits, and this the approach that has been taken, as clarified against 3.1.70 in this table above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			source and each affected receptor should be considered on its own merits.	
SLD-132	Noise and Vibration	NV2.4	3.1.75. The Applicant provides no evidence that the maintenance burden of additional attenuation would be disproportionate when balanced against the long-term protection of residential amenity at receptors predicted to experience adverse effects. Nor does it demonstrate why the social objective of minimising noise impacts should be given less weight than avoiding maintenance obligations.	The Applicant has clarified that the maintenance burden would be disproportionate in instances where there is no noticeable benefit to residential amenity. In instances where there is a benefit to be had, the Applicant has prioritised minimising noise impacts over maintenance obligations.
SLD-133	Noise and Vibration	NV2.4	3.1.76. The Applicant's conclusion that further attenuation would be contrary to sustainable development is unsupported. Sustainable development requires a balance between operational efficiency and protection of affected communities. The fact that attenuation has been accepted as appropriate at some locations demonstrates that such mitigation is both technically feasible and capable of being integrated into the Scheme. The Applicant has not	See the clarifications above, against items 3.1.70 and 3.1.75 – extending the equivalent mitigation to other locations is not proportionate when the associated noise level reductions at receptors would be minimal.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			demonstrated why extending equivalent mitigation to other locations would represent a disproportionate or unreasonable sustainability burden.	
SLD-134	Noise and Vibration	NV2.4	3.1.77. Monitoring should include consideration of all operational noise sources associated with the development, rather than being limited to the central BESS area, to ensure that the measured performance reflects the cumulative operational noise experienced at nearby receptors.	Monitoring cumulative levels at nearby receptors would not reflect the noise of the scheme, merely the existing ambient which would be dominant over the scheme noise most of the time. It is not proportionate or sustainable to monitor at all conversion units over the entire lifetime of the scheme to cover the unlikely event that a unit develops a fault that causes it to become louder than expected. Such cases are more reasonably covered by taking corrective actions in response to incidents, as committed to in Section 6.2 of the **Outline Operational Environmental Management Plan [REP6-032]**.

Table 3-9 Stop Lime Down – Conclusion [REP6-081]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-135	Scheme Description and DCO Process	Conclusion	4.1.1. This submission has responded to ExQ2 and commented upon the documents submitted by the Applicant and other parties at Deadline 5. 4.1.2. SLD's review of that material confirms that the additional information has not resolved the concerns raised by SLD at preceding deadlines. For all the reasons set out in this submission, and the documents prepared by SLD so far, SLD maintains that development consent should not be granted for the Scheme.	The Applicant has responded to SLD's comments throughout this section of this document.

Table 3-10 Stop Lime Down – Appendix A: Landscape Response [REP6-081]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-136	Scheme Description	Introduction	Introduction	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	and DCO Process		**1.** Section A of this note sets out SLD's comments on landscape matters pertaining to the Change Application, and new and updated information submitted by the Applicant and others at Deadline 5. **2.** For the avoidance of doubt, where no comments have been provided in respect of a document is not mentioned, SLD maintains its position. **3.** Whilst the Applicant's new and updated information has clarified certain matters and raised a few additional queries, at this point SLD fully maintains the position of its landscape expert Ms Tinkler as set out in SLD's *Landscape and Visual Impact Report* (LVIR) **[REP1-170]**.	
SLD-137	Landscape and Visual	Introduction	**4.** Also, here, SLD would like to draw the ExA's attention to an action arising from Deadline 3 for the Applicant to produce new material which, as far as SLD can ascertain, has not yet been submitted.	Following the request from the ExA, the Applicant prepared additional Photomontages: Viewpoint ExA 1 - from PRoW WT|HULL|6; and Viewpoint ExA 2 - from PRoW WT|HULL|1. Both sets of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			The action is in the Applicant's response to ExQ1 **[REP3-128]** LV1.13, which relates to the Applicant not having provided illustrations showing the changes in views that would be experienced by people travelling along PRoWs crossing sites A – E in fields where solar arrays are proposed.	Photomontages are contained within **Environmental Statement Volume 2 Figure 8-14 Baseline Photography and Photomontages - Viewpoint 45 - CNL G (Part 3) [REP5-044]**. At the request of the ExA, the Applicant has also prepared two illustrative sections: Section A-A' across PRoW WT|HULL|1 between Fields D3 and D5; and Section B-B' across PRoW WT|HULL|6 northwest of Field D13 which are also contained within **Environmental Statement Volume 2 Figure 8-14 Baseline Photography and Photomontages - Viewpoint 45 - CNL G (Part 3) [REP5-044]**.
SLD-138	Landscape and Visual	Introduction	**5.** The ExA asked the Applicant to provide representative photomontages and typical sections showing the view from a PRoW 1) crossing a field with Solar PV panels either side, and 2) with	Please see Applicant's response to SLD-137. The Applicant has prepared representative photomontages and typical section drawings as requested. These were submitted at Deadline 5 and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Solar PV panels to one side. The Applicant agreed to do this "at a future date". Clarification as to whether this material has been provided would be helpful (if not submitted at Deadline 6), and if not, when it would be provided (ideally, before ISH5).	can be found within **Environmental Statement Volume 2 Figure 8-14 Baseline Photography and Photomontages - Viewpoint 45 - CNL G (Part 3) [REP5-044]**.
SLD-139	Landscape and Visual	Change Application	**A) Change Application** **6. [REP3-134]** is the Applicant's *Change Notification June 2026 Revision 1*. These comments have also been informed by the other Change Application and Application documents including **[CR1-045]** *Change Application and Consultation Report*; **[CR1-046]** *Supporting Environmental Information Report (Change Application)*; **[CR1-035]** *Assessment of Effects on the CNL and its Special Qualities (Change Application) (Rev 1) (Tracked)*; and **[REP2-012]** ES Volume 2 Figure 8-14 Baseline Photography and Photomontages - Viewpoint 45- CNL G (Part 3) (Rev 3).	The Applicant notes these comments.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			7. The only proposed change in the Change Application that is considered to be of more than relatively minor relevance to landscape and visual matters is Change 4: Removal of Solar PV Infrastructure from Lime Down C.	
SLD-140	Landscape and Visual	Change Application	**Change 4: Removal of Solar PV Infrastructure from Lime Down C** **8.** To help reduce high levels of adverse visual effects, the Applicant now proposes to remove solar arrays and infrastructure from the whole of Field C9, which is arable land lying east of Alderton Road and south of the railway, with existing woodland (Broadmead Covert) to the northeast. The CNL boundary runs along Alderton Road. **9.** Ms Tinkler **agrees** with the Applicant that the removal of solar arrays / infrastructure from Field C9 would help to reduce levels of adverse visual effects in views towards Field C9 from Alderton Road, and that the effects would no longer be 'significant'.	The Applicant welcomes SLDs confirmation that the removal of solar arrays / infrastructure from Field C9 would reduce the levels of visual effects and that there would no longer be Significant Adverse effects to users of Alderton Road as a consequence of the Scheme. The Local Nature Recovery Strategy for Swindon and Wiltshire sets out throughout the document that *"Maintaining appropriate levels of scrub enhances habitat and structural diversity, supporting more species. Scrub also improves soil water infiltration and provides shade, boosting*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			10. However, in Ms Tinkler's opinion, the reduction in the levels of adverse visual effects would not be as great as the study has assumed. **11.** The proposal includes the establishment of 'low density scrub' in the field, with the objective of 'rewilding' the area as an ecological habitat and improving ecological connectivity. **12.** The introduction of ecological restoration or rewilding measures within the receiving landscape is very likely to result in localised adverse landscape and visual effects which would increase in level as the proposed planting matures, due to the contrast between the existing orderly agricultural baseline character, as identified in, and typical of, the published character assessments, and dynamic, unmanaged vegetation, which is not characteristic in these landscapes. It is not clear whether the Applicant's study has factored in this negative effect. Clarification would be helpful.	*the site's resilience to runoff and drought."* And within Section 12.6 Mixed Habitats that the creation of areas of Mixed Scrub and Scattered Scrub as being *"Primary priority habitats – Habitats we are seeking to be maintained or created."* Therefore, it is only reasonable to assume that there is an understanding that these landscapes are dynamic and through the implementation of the Local Nature Recovery Strategy that there would be an increase in the change in farming practices across Wiltshire with more land being brought forward for nature Recovery purposes rather than traditional agricultural farming. Mixed habitats, such as grassland-scrub mosaics, wood pasture and traditional

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				orchards, provide structural variety that supports a wide range of wildlife, including rare and declining species. These mosaics of combining grassland, bare ground, scrub and trees form a resilient alternative. By encouraging natural processes and adapting management, they improve water quality, deliver ecosystem services and reduce the need for heavy intervention. Crucially, mixed habitats strengthen ecological connectivity, helping landscapes adapt to climate change while supporting wider nature recovery. The Applicant recognises that these changes in land management would begin to alter the character of the receiving landscape, but respectfully disagrees that these changes would necessarily be adverse, but would suggest that they would be perceived as neutral.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				This, within the remit of LVIA, being when the predicted residual change would, on balance, result in neither an improvement, nor a deterioration of the landscape and visual resource compared with the existing situation. A change to the landscape and visual resource is not considered to be adverse simply because it constitutes an alteration to the existing situation.
SLD-141	Landscape and Visual	LV2.1 Time Limited Enhancements	**B) New Documents Submitted at D5 (Applicant)** **B1 [REP5-097] Applicant's Response to ExQ2** **13.** This question is to the Applicant, Wiltshire Council, Natural England, and the CNLB. It relates to the proposed enhancement measures through which the Applicant seeks to further the purpose of the CNL.	The Applicant notes this comment.
SLD-142	Landscape and Visual	LV2.1 Time Limited Enhancements	**14.** Ms Tinkler commented on the question at Deadline 5, in Section B of SLD's *Landscape Responses to*	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Deadline 4 Documents and ExQ2 (Appendix A to **[REP5-130]**).	
SLD-143	Landscape and Visual	LV2.1 Time Limited Enhancements	**15.** For ease of reference and comparison, SLD's comments on all the parties' Deadline 5 responses to this question are in this section.	The Applicant notes this comment.
SLD-144	Landscape and Visual	LV2.1 Time Limited Enhancements	**16. Part 1)** of the question asks the Applicant whether the proposed wildflower meadows and verges (which are enhancement measures) are *"time limited and removed at decommissioning"*. The Applicant explains that the continuation of the enhancements *"are dependent upon the continuation of the development"* and *"would be removed at decommissioning"*, although it is noted that the Applicant *"cannot control what is done with these elements on decommissioning and return of the land to the original landowner"*. It is acknowledged that, in principle, it would be open for the landowner to retain them.	Please see the Applicant's response to SLD-145 below.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-145	Landscape and Visual	LV2.1 Time Limited Enhancements	**17.** Clarity is sought from the Applicant as to whether they have therefore conducted the assessment on the basis that the wildflower meadow and verges would be removed, as SLD understands. Generally, greater clarity would be welcome in respect of what assumptions have been made on decommissioning for the purpose of assessing the reasonable worst-case scenario. SLD notes that, as above, some elements may be an ecological 'enhancement' for the scheme, while also causing adverse effects in the landscape terms.	The Scheme is proposed on a temporary basis. The Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. As such, the Scheme would be required to be decommissioned and the land returned to landowner control and any subsequent management, alteration or removal of habitats established as part of the Scheme (including the wildflower meadow and verges) would be subject to, and undertaken in accordance with, the relevant environmental legislation and regulatory requirements in force at that time. The Applicant has undertaken the LVIA on the basis that the agricultural land within the Scheme would be returned to landowner control, whilst the use of the land beyond the lifetime of the scheme

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				is not in the Applicants control it is anticipated that subject to any relevant environmental legislation and regulatory requirements in force at that time, the land would be returned into agricultural use.
SLD-146	Landscape and Visual	LV2.1 Time Limited Enhancements	**18.** Re **Part 2)**, all the parties including SLD **agree** that *"a time limited enhancement can be relied on to seek to further the purpose of conserving and enhancing the natural beauty of the national landscape under section (s) 85…"*.	The Applicant notes and welcomes agreement from SLD that a time-limited enhancement can be relied upon to seek to further the purpose of conserving and enhancing the natural beauty of the CNL under section 85 of the CRoW Act. This position aligns with that of the Cotswold National Landscape Board. The Applicant notes that there is no specific requirement within the wording of the CRoW Act or supporting DEFRA guidance for enhancements to be permanent, and that the Applicant has received confirmation from the CNLB in their document submitted into Examination **'Comments on any other**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				submissions received at deadline 2' [REP3-154] acknowledge that the Applicant has sought to further the purposes of the CNL: *"…the Applicant has sought to further its natural beauty through the proposed enhancement measures located in the setting of the CNL, including some of those outlined at Table 19 of ES Appendix 8-6 such as 60 hectares of wildflower meadow and 63 hectares of set aside for ground nesting birds. These would comprise enhancements to the CNL's setting above and beyond the current baseline condition on land which is visually connected to, and has a complementary landscape character to, the adjacent CNL."*
SLD-147	Landscape and Visual	LV2.1 Time Limited Enhancements	**19.** However, both SLD and Wiltshire Council emphasise that the enhancement / benefit is very small compared to the significant amount of harm that would be caused by the Scheme overall.	The Enhancement Measures contained within the proposals serve a separate purpose to that of the proposed mitigation.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Annex C of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** includes Figures P4443_LPR_ZZ_XX_DR_Z_EXA_0371 Sheets 1 to 3 that set out those areas of the Scheme where the Applicant considers that the proposals are providing an enhancement and conversely where the proposals are therefore providing mitigation. The Applicant directs to Natural England's response to ExA Second Written Question **[REP5-140]** LV2.1 Time Limited Enhancements where they state that: *"Natural England advises that the habitat creation measures proposed as part of the scheme are in themselves highly significant."* Following the removal of infrastructure from Fields C9 and the southern section of A1 there are no longer any Significant

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Adverse effects to receptors within or on the boundary of the CNL. There are also no Significant Adverse effects to the landscape character of the land within the CNL. Although significant landscape effects have been recorded within the 1 km Local Study Area of the Lime Down Sites, these effects are primarily related to the change in land use from agriculture to the solar infrastructure within the Site and its immediate setting. However, this change does not directly affect the CNL as the buffers to the development provided by the avoidance measures and layers of proposed mitigation planting to the arrays would contain the development away from the edge of the CNL. The Applicant has prepared an assessment of Landscape Character effects on the local Landscape

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Character Areas and Types **[REP6B-008]** which provides greater detail and clarity on this distinction. This concludes that there are no direct landscape effects on the Sherston Dipslope or the Upper Avon Valley within the CNL and there are only low levels of change (both positive and negative) to the perceptual and aesthetics qualities of a limited number of key features and there would be a Very Low overall level of change at all stages of the assessment resulting in Negligible Adverse indirect Effects to landscape character within the CNL.
SLD-148	Landscape and Visual	LV2.1 Time Limited Enhancements	**20.** Re **Part 3)**, the question is, *"If enhancements are removed at decommissioning, would that then be considered a harm to the purposes of the Cotswolds National Landscape at decommissioning?"*	The Applicant notes this comment.
SLD-149	Landscape and Visual	LV2.1 Time Limited Enhancements	**21.** The CNLB says **yes**. The Applicant and SLD say **no**. Natural England and Wiltshire Council say the answer could be **yes or no**, depending on whether the	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			effects of the proposed enhancement measures are measured against the **existing baseline** situation, or the **future pre-decommissioning** baseline.	
SLD-150	Landscape and Visual	LV2.1 Time Limited Enhancements	**22.** Natural England and Wiltshire Council say **no** if measured against the **existing** baseline, and **yes** if measured against the **future** baseline.	The Applicant notes this comment.
SLD-151	Landscape and Visual	LV2.1 Time Limited Enhancements	**23.** Ms Tinkler's understanding is that for DCOs / NSIPs, the measurement should be based on the **existing** baseline situation.	With regard to the removal of enhancement measures at decommissioning, the Applicant's position is that rather than the removal of the enhancements being harmful to the setting of the CNL, the removal of the enhancements would constitute a return to the current baseline position. The Applicant welcomes agreement from SLD on this matter.
SLD-152	Landscape and Visual	LV2.1 Time Limited	**24.** SLD's **no** answer was based on that assumption, and it appears that the Applicant's **no** answer is also based on	The Applicant notes that this question is addressed to the CNLB.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Enhancements	the same assumption. It is not clear whether the CNLB's **yes** answer assumed existing or future baseline: clarification of this point may be helpful.	
SLD-153	Landscape and Visual	LV2.1 Time Limited Enhancements	**25.** In summary, in Ms Tinkler's opinion, if the measurement should be based on the **existing** baseline situation, then if the enhancements were removed at decommissioning, this would **not** be a harm to the CNL's purposes at decommissioning because the removal would be the cessation of a time-limited benefit, not the introduction of a new adverse effect.	The Applicant welcomes agreement from SLD on this matter.
SLD-154	Landscape and Visual	LV2.1 Time Limited Enhancements	**26.** However, if it should be the **future** baseline, then there **would** be harm to the CNL's purposes at decommissioning, for the reasons outlined in Natural England's and Wiltshire Council's responses. However, in that case, presumably the amount of harm would be very small compared to the very large amount of benefit caused by the removal of the whole Scheme.	The Applicant maintains its position as set out in SLD-151.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-155	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**27.** This question is to Natural England, asking if it agrees with the Applicant's response to ExQ1 LV1.9 **[REP3-128]** which sets out the Applicant's conclusions about the spatial extent of the CNL's setting.	The Applicant notes this comment is addressed to Natural England.
SLD-156	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**28.** SLD's comments on Natural England's response to this question are set out in Section D1 below.	The Applicant notes this comment.
SLD-157	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**29.** The Applicant's comment on this question states that *"The Applicant considers the setting of the CNL to extend across parts of Lime Down A, B and C, but not across the entirety of the three sites. The Applicants position is that* ***the setting for the CNL extends as far as to where development or land management proposals, can be considered to have an impact upon the CNL"*** (emphasis added).	The Applicant has set out its understanding of the extent of the setting of the CNL within Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**.
SLD-158	Landscape and Visual	LV2.5 – Setting of the	**29.** The Applicant's comment on this question states that *"The Applicant*	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Cotswolds National Landscape	*considers the setting of the CNL to extend across parts of Lime Down A, B and C, but not across the entirety of the three sites. The Applicants position is that* ***the setting for the CNL extends as far as to where development or land management proposals, can be considered to have an impact upon the CNL****"* (emphasis added).	
SLD-159	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**30.** This comment appears to confirm that the Applicant's criteria for establishing the spatial extent of the CNL's setting align with those of the CNLB and other National Landscape teams, with which Ms Tinkler **agrees**, with the first step in the assessment process being to establish the extent of the setting by identifying areas where there would be an indirect effect on the CNL, followed by the assessment of the levels of any such effects.	The Applicant notes and agrees with this comment.
SLD-160	Landscape and Visual	LV2.5 – Setting of the Cotswolds	**31.** As well as Ms Tinkler, it appears that other parties had assumed the Applicant's Landscape and Visual Impact Assessment (LVIA) **[REP3-025]**	The Applicant welcomes confirmation from SLD that they do not consider Lime

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		National Landscape	was correct in finding no intervisibility / interinfluence / association between Lime Down D and E and the CNL. Therefore, no indirect effects on the CNL would arise from sites Lime Down D and E, and therefore, Lime Down D and E are not within the CNL's setting. However, the parties do **not agree** with the LVIA's conclusion that the indirect effects, and therefore the setting, would be restricted to relatively small parts of A, B and C.	Down Sites D and E to be within the setting of the CNL. The Applicant notes the varying positions held by Parties on the extent of the setting of the CNL.
SLD-161	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**32.** However, as explained further in comments on Natural England's response below, at Deadline 4, the Applicant submitted 'augmented' Zone of Theoretical Visibility (ZTV plans) **[REP4-085]**, as requested at ISH2, to check the extent of the intervisibility of the individual sites with the CNL which is difficult to establish through fieldwork, especially Lime Down D and E which are furthest from the CNL boundary.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-162	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**33.** The ZTV plans show potential intervisibility between the CNL and Lime Down D and E, Lime Down E being the easternmost part of the Scheme. Therefore, as explained in SLD's *Deadline 5 Submission* **[REP5-130]**, Appendix A, Section A, 1c) *Written Summary of Applicant's Oral Submissions and Responses at ISH2* [REP4-085], Lime Down D and E must be within the CNL's setting.	ZTV mapping is the desk study component of the visibility analysis. ZTV identifies land that, theoretically, is visually connected with the proposal, however in reality this often produces an overestimation of potential visibility of a Scheme, as in actuality there are often many layers of vegetation or other features across the landscape that are not captured by the ZTV modelling that could affect visibility. The ZTVs provide a starting point in the assessment process and therefore provide a 'worst case' illustration of theoretical visibility. ZTVs are a tool to inform site appraisal and are not a substitute for on site assessment and therefore good practice is that the extent of potential visibility of a Scheme is then refined by site survey. The Applicant confirms that extensive site work has been undertaken at varying points across the year to allow appraisal of the site, the receiving and wider landscape to account for seasonal

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				variation, which has included accompanied site visits with representatives of both the CNLB and WC. This has been supported with viewpoint photography and photomontage, including those additional viewpoints requested by the CNLB and WC. Through their extensive on Site assessment, the Applicant has not found any intervisibility between land within Lime Down Sites D or E and the CNL.
SLD-163	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**34.** However, also as explained in [REP5-130], the main focus of EIA / LVIA is on 'significant' effects. In relation to the CNL's setting, the parties appear to **agree** these would occur west of the Fosse Way, so that is where attention is focussed (notwithstanding a wider setting might possibly be inferred from the new ZTV plans).	The Applicant has set out their understanding of the extent of the setting of the CNL within Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**, and that this relates to the land on the edge of the CNL and the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-164	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	**35.** This question is to Natural England, asking 1) whether it agrees with the CNLB's position or the Applicant's position on the CNL's Special Qualities, and 2) if it considers that the Applicant has demonstrated that there would not be cumulative effects on the CNL that would increase effects identified when considering the project alone.	The Applicant notes this comment is addressed to Natural England.
SLD-165	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	**36.** SLD's comments on Natural England's response regarding Part 1) (CNL Special Qualities) are set out in Section D1 below.	The Applicant notes this comment.
SLD-166	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its	**37.** The Applicant's comments on Part 1) of the question include the following statement: *"[T]he landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative*	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Special Qualities	*design process and has been informed by the Cotswold Nature Recovery Plan in conjunction with liaison with the project Ecologist and consultation with officers at the CNL and WC. The Scheme has avoided harm to the CNL, maintained views to and from the CNL, protected the features of the landscape within the setting of the CNL, retained and enhanced the character of the landscape through the proposed embedded mitigation and provided positive enhancements to further the purpose of the CNL."*	
SLD-167	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	**38.** Ms Tinkler does **not agree** with many of the assertions made in the above statement: i) Very few of the landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated, and many cannot be mitigated, and would remain 'significant' for the duration of the operation.	Following the removal of infrastructure from Fields C9 and the southern section of A1 there are no longer any Significant Adverse effects to receptors within or on the boundary of the CNL. There are also no Significant Adverse effects to the landscape character of the land within the CNL.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Although significant landscape effects have been recorded within the 1 km Local Study Area of the Lime Down Sites, these effects are primarily related to the change in land use from agriculture to the solar infrastructure within the Site and its immediate setting. However, this change does not directly affect the CNL as the buffers to the development provided by the avoidance measures and layers of proposed mitigation planting to the arrays would contain the development away from the edge of the CNL. The Applicant has prepared an assessment of Landscape Character effects on the local Landscape Character Areas and Types (**Limestone Lowlands Character Assessment [REP6B-008]**) which provides greater detail and clarity on this distinction. This concludes that there are no direct landscape effects on the Sherston Dipslope or the Upper Avon Valley within

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the CNL and there are only low levels of change (both positive and negative) to the perceptual and aesthetics qualities of a limited number of key features and there would be a Very Low overall level of change at all stages of the assessment resulting in Negligible Adverse indirect Effects to landscape character within the CNL.
SLD-168	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	ii) The Scheme has **not** avoided harm to the CNL: the LVIA concludes that receptors within the CNL would experience 'significant' adverse effects, and in SLD's experts' opinions, there are likely to be direct effects on the CNL along the proposed construction route.	See Applicant's response to SLD-167 above.
SLD-169	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its	iii) The Scheme could maintain some views to and from the CNL, but certainly not all, and many visual receptors would experience 'significant' adverse effects.	See Applicant's response to SLD-167 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Special Qualities		
SLD-170	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	iv) The Scheme would protect certain existing landscape 'features' within the setting of the CNL such as hedges, woodland, grassland and watercourses; however, it would also result in 'significant' adverse effects on other 'features' which are aspects of 'landscape' as shown in *Figure 1: What is Landscape?* in Natural England's 2014 publication *An Approach to Landscape Character Assessment*, including aesthetic and perceptual qualities, and 'significant' adverse effects on the overall character of the landscape, where rural agricultural 'features' are replaced by industrialised 'features'.	See Applicant's response to SLD-167 above.
SLD-171	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its	v) The overall character of the existing landscape is neither retained nor enhanced.	With the setting of the CNL, as defined by the Applicant within Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape of the **Applicant's Response to the Examining Authority's First Written**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Special Qualities		**Questions [REP3-128]**, the Scheme has sought to further the purposes of the CNL through the creation of wildflower meadows and scrub on the edge of the CNL within Fields A1, C1, C6, C8, C9, C10 and B12 and through the inclusion of wildflower meadow verges on the edge of set aside land in A11, A12 and C10 to provide attractive buffers in views from public roads. These support the aims of the Cotswolds National Landscape Management Plan 2025-2030 and of the Cotswolds Nature Recovery Plan. Harm to the CNL itself would be minimal with beneficial landscape effects associated with the proposed enhancement measures proposed along the western extents of the Scheme within the setting of the CNL, which in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the long term which would further the purposes of the designation. The Scheme has avoided harm to the CNL, maintained views to and from the CNL, protected the features of the landscape within the setting of the CNL, retained and enhanced the character of the landscape through the proposed embedded mitigation and provided positive enhancements to further the purpose of the CNL. The assessment of effects on the CNL and its Special Qualities found that there are no significant direct effects on the CNL or its Special Qualities.
SLD-172	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its	vi) The proposed landscape / visual mitigation measures would **not** deliver landscape / visual enhancement, as they cannot be double counted (see SLD's previous submissions, and following sections).	The Applicant maintains its position that it has not double counted landscape / visual mitigation as landscape / visual enhancement noting that within the Overarching National Policy Statement for Energy (NPS) EN-1 recognises at

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Special Qualities		para 5.10.5 that: *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation".*
SLD-173	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	vii) The LVIA acknowledges that the proposed embedded mitigation would result in adverse landscape and visual effects.	The **LVIA [REP6B-004]** recognises that by growing hedgerows to up to 4.5m that this would result in adverse effects on Landscape Character and Visual Amenity through providing greater enclosure across the land within the Scheme.
SLD-174	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	viii) During the operational phase, the measures which are definitely enhancement and not mitigation and which are intended to help further the purposes of the CNL would fulfil the objective; however, the enhancement / benefit is very small compared to the significant amount of harm that would be caused by the Scheme overall.	The Applicant welcomes SLDs acknowledgement that the proposed enhancement measures are beneficial. The Applicant has set out what measures are considered enhancement and with are mitigation within Annex C of **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-175	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	**39.** In the response to Part 2) of the question, the Applicant states that *"It was agreed [with Natural England] that there are **no cumulative effects on the CNL itself**, noting that the Lime Down Scheme is not within the CNL"* (emphasis added).	The Applicant notes this comment.
SLD-176	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	**40.** Natural England's response to the question states that it *"understands that the applicant hasn't identified any development sites which will have a cumulative effect on the CNL or its setting in its cumulative assessment. Therefore, no further information is requested on this matter"*.	The Applicant notes this comment.
SLD-177	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	**41.** Ms Tinkler **agrees** that there would not be any **direct** adverse cumulative effects on the CNL itself (although there is the potential for direct adverse cumulative effects to arise along construction routes through the CNL, as explained in previous submissions by	The Applicant welcomes and agrees with SLD that there would not be any direct adverse cumulative effects on the CNL. The proposed construction routes for the Lime Down Solar Project within the CNL do not share any construction routes with any of the Cumulative Development Sites. As such the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			various parties including the CNLB and SLD).	Applicant respectfully disagrees with this position.
SLD-178	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	**42.** However, Ms Tinkler does **not agree** that there would be no **indirect** cumulative effects on the CNL itself. In fact, the LVIA concludes that both on its own and in combination with the other identified projects, the Scheme would result in '**significant**' adverse indirect effects on the CNL (see for example Table 8-32: *Assessment of Cumulative Scheme Effects*).	The Applicant notes this comment as a misinterpretation of the findings of the LVIA including **Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]**. The **LVIA [REP6B-004]** concludes at para 8.10.136: *"Although significant landscape effects have been recorded within the 1 km Local Study Area of the Lime Down Sites, these effects are primarily related to the change in land use from agriculture to the solar infrastructure. This change does not directly affect the CNL as the buffers to the development provided by the avoidance measures and layers of proposed mitigation planting would contain the development away from the edge of the CNL. As such, the development would be barely discernible from within the CNL."*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				These conclusions are further supported through the findings of the **Limestone Lowlands Character Assessment [REP6B-008]** which sets out that although significant landscape effects have been recorded within the 1 km Local Study Area of the Lime Down Sites, these effects are primarily related to the change in land use from agriculture to the solar infrastructure within the Site and its immediate setting. However, this change does not directly affect the CNL as the buffers to the development provided by the avoidance measures and layers of proposed mitigation planting to the arrays would contain the development away from the edge of the CNL. The Limestone Lowlands Character Assessment concludes that there are no direct landscape effects on the Sherston Dipslope or the Upper Avon Valley within the CNL and there are only low levels of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				change (both positive and negative) to the perceptual and aesthetics qualities of a limited number of key features and there would be a Very Low overall level of change at all stages of the assessment resulting in Negligible Adverse indirect Effects to landscape character within the CNL.
SLD-179	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**43.** This question asks the Applicant whether the proposed linear tree planting in hedges along the lanes which form the boundary of the CNL in the area would *"preserve the character of the setting of the National Landscape"*, given that during operation, hedges in these locations would be kept low in order to maintain the characteristic and important open views towards and from the CNL, which are experienced by many High sensitivity receptors, whereas trees could screen the views.	The Applicant notes this comment.
SLD-180	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of	44. The Applicant's response states that the aim is *"to promote standard hedgerow trees at an average density of at least one tree every 20 m to allow for*	As set out within the **Applicant's Response to the Examining Authorities Second Written Questions [REP5-097]** QLV2.7, the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		the Cotswolds National Landscape	*irregular spacing which complements the existing landscape character The presence of trees at this density is not expected to compromise the open views along the boundaries of C1, C6 and C8 and will support the landscape character of their setting"*.	**Outline LEMP [REP6-037]** does not specify the density required for Linear Tree Planting alongside existing hedgerows, allowing this to be determined within detailed design (subject to consent) and in consultation with the CNLB and WC.
SLD-181	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**45.** The response also states that *"The Outline LEMP does not specify the density required for Linear Tree Planting alongside existing hedgerows, allowing this to be determined within detailed design (subject to consent) and in consultation with the CNLB and WC"*.	The Applicant refers to its response at SLD-180.
SLD-182	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**46.** Firstly, regarding the spacing between new trees proposed to be planted within hedgerows, the Applicant's assertion that the Outline LEMP **[REP5-080]** does not specify the density required for linear tree planting in hedgerows is **incorrect**.	The **Outline LEMP [REP6-038]** does not specify the density required for Linear Tree Planting alongside existing hedgerows. SLD are correct that the Outline LEMP specifies tree planting within proposed hedgerows, however as shown within the Landscape and Ecology Mitigation Plans there are no

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				new hedgerows proposed along the boundary with the CNL, and therefore allowing density of linear tree planting in this location to be determined within detailed design (subject to consent) and in consultation with the CNLB and WC.
SLD-183	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**47.** Under the heading *Hedgerow Tree Planting*, para. 1.3.36 of the Outline LEMP states, *"All newly planted hedgerows will include Select Standard trees randomly spaced between **5–9 m** centres. On occasions where visual receptors are likely to see visual effects in close proximity, denser tree planting of between **2–3 m** centres may be adopted to provide more instant screening effects"* (emphasis added).	The Applicant notes this comment.
SLD-184	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds	**48.** This contradicts the proposal for 20m centres stated in the response. It would be helpful if the Applicant could clarify which is correct.	See Applicant's response to SLD-182 above. The density of linear tree planting is to be determined within detailed design

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		National Landscape		(subject to consent) and in consultation with the CNLB and WC. The 5-9m and 2-3m refers to newly planted hedgerows. The section of the scheme directly adjacent to the CNL does not propose for new hedgerow as the roadsides and field boundaries are already demarked by existing hedgerow.
SLD-185	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**49.** Secondly, Ms Tinkler does **not agree** that the proposed linear tree planting in hedges *"complements the existing landscape character"*, nor that it would *"support the landscape character of their setting"*. Escaped roadside hedgerow trees are **not** characteristic along this section of the CNL boundary, which here runs from Sherston (along Church Road) to the Fosse Way, passing east of Alderton which lies just west of Lime Down C and Fields C1, C6, and C8.	See Applicant's response to SLD-182 above. The roads within the proximity to the CNL, including those referenced by SLD are marked by hedgerow trees, and therefore it is the Applicant's position that the planting of trees within the existing hedgerows alongside these roads is in keeping with the character of the area. The density of linear tree planting is to be determined within detailed design

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				(subject to consent) and in consultation with the CNLB and WC.
SLD-186	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**50.** In fact, escaped hedgerow trees in field boundaries are not characteristic in the whole area between the lane and the Fosse Way, as can be seen while travelling through the area (and on Google Earth).	See Applicant's response to SLD-182 and 186 above. It is the Applicant's position that the planting of trees within the existing hedgerows alongside these roads is in keeping with the character of the area.
SLD-187	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**51.** The images below, which are snipped from Streetview (© Google, various dates), show the open views which are experienced from the lanes.	See Applicant's response to SLD-182 above.
SLD-188	*Looking east and south from Church Road towards Lime Down C (lying east of Alderton Road)*			See Applicant's response to SLD-182 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			 52. The above image shows mature roadside hedgerow trees (on the skyline) along Alderton Road along the western boundary of Lime Down C (Fields C1, C6, and C8), from its junction with Church Road to the lane leading west to Alderton village. This section of the lane is c. 0.5km long, and it contains just three mature roadside hedgerow trees.	
SLD-189			*Looking north along Alderton Road, north of Alderton, adjacent to Lime Down C (right-hand side of image)* 	See Applicant's response to SLD-182 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-190	*Looking north west along Alderton Road, south of Alderton, adjacent Lime Down C (right-hand side of image)* 			See Applicant's response to SLD-182 above.
SLD-191	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**53.** In the above image, the distance between the mature roadside hedgerow trees on the west side of the lane (left-hand side of image), is c. **150m**.	See Applicant's response to SLD-182 above.
SLD-192	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds	**54.** Because linear tree planting in hedges along / in the vicinity of the boundary of this part of the CNL is uncharacteristic, let alone at such close spacing, the proposal would certainly	See Applicant's response to SLD-182 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		National Landscape	**not** *"preserve the character of the setting of the National Landscape"*.	
SLD-193	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**55.** Furthermore, the trees would only be planted in the hedges on the east side of the lane (for a total distance of at least c. 800m). Even if the spacing was greater than the 20m stated in the Applicant's response to the question, this would still appear discordant in these open views, in particular when approaching maturity: at 20m spacings, the tree canopies of large species such as lime and oak would eventually merge, effectively forming a very long, tall 'wall' when in full leaf.	See Applicant's response to SLD-182 above.
SLD-194	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**56.** Thirdly, regarding the *open views along the boundaries of C1, C6 and C8*, the reason why views across these fields are currently open is because the existing roadside trees are few and far between.	See Applicant's response to SLD-182 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-195	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**57.** The presence of roadside hedgerow trees at up to 20m spacing would **certainly** compromise the existing open views towards and from the CNL. But even with greater spacing, many views would be compromised because along linear routes, from certain angles, when the trees are in full leaf, even if the canopy edges are far apart, they appear to close / coalesce, so the screening effect is perceived as being greater than it actually is.	See Applicant's response to SLD-182 above.
SLD-196	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**58.** Another concern is the Applicant's proposal to plant 'select standard' trees, as mentioned above with reference to the Outline LEMP. These relatively large specimens are usually specified when 'rapid' growth eg for screening purposes is required. In practice, smaller specimens (whips and feathers) tend to establish more successfully and catch up quickly, often becoming healthier plants. They also require less after-care, including less watering.	See Applicant's response to SLD-182 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-197	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**59.** According to UK suppliers of 'select standard' trees, and forestry management guidance (see for example Gov.UK Forestry Commission Blog 19th May 2025 *How to help young trees survive prolonged hot dry weather*), for at least three years after planting, during extended periods of dry weather, the new trees should be watered every other day (a minimum of two or three times a week), each tree being supplied with 20 - 30 litres of water at each session. Ideally, the watering should be carried out in early morning or late evening.	The Applicant notes this comment.
SLD-198	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**60.** However, that advice does not account for the extreme heat and long periods of drought experienced in the last two years, which may occur more frequently in future. It is not clear how the Applicant intends to address watering under such circumstances, in terms of source, availability, and capacity of the water supply, and frequency of monitoring (which should	Water required for establishment of new planting would be obtained from authorised supplies. It would not rely on uncontrolled abstraction from watercourses, ponds or groundwater. **Outline Water Resources Strategy [APP-290]** provides an early-stage evaluation of quantities of water required

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			include checking weather forecasts to ensure contractors will water before the soil becomes too dry).	for the Scheme during construction and operation and where the Applicant is likely to resource these demands. The final watering regime, including frequency, method of delivery and duration, will be confirmed through the detailed LEMP, secured by Requirement 12 of the **Draft DCO [REP6-005]** and prepared substantially in accordance with the **Outline Landscape and Ecology Management Plan [REP6-037]**. This is appropriate because watering requirements will depend on the final planting specification, planting season, weather conditions and establishment success. Where water is delivered by bowser or tanker, those movements would be temporary and intermittent. They would be managed through the relevant construction, access and landscape management controls. They would not

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				represent a continuous operational water demand. Access for watering would also be managed to avoid unnecessary soil compaction, rutting, runoff or damage to drainage features, in accordance with the **Outline Construction Environmental Management Plan [REP6-029]** and **Outline Soil Resources Management Plan [REP6-035]**. The Applicant therefore does not consider that establishment watering gives rise to a material hydrology, flood risk or drainage effect.
SLD-199	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds	**61.** If newly-planted trees and shrubs do not establish successfully and have to be replaced – which could potentially be more than once during the Scheme's 60-year operational period – there would be consequences for the LVIA's	Please see Applicant's response to SLD-198 above which addresses establishment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		National Landscape	assumptions about the length of time it would take for plants to grow tall enough to screen views. Levels of adverse effects could remain at high levels for longer than predicted.	
SLD-200	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape	**62.** If it was concluded and agreed that roadside hedgerow trees were not appropriate in this location due to being uncharacteristic in the landscape, and should be removed from the Scheme, there may be consequences for the LVIA's assumptions about the beneficial effects on / arising from new landscape 'fabric'. However, conclusions would presumably not change in respect of levels of adverse effects on overall character, since the LVIA does not consider that the linear tree planting would result in adverse landscape effects.	See Applicant's response to SLD-182 above.
SLD-201	Landscape and Visual	LV2.7 – Linear Tree Planting in the Setting of the	**63.** Regarding the consequences for visual effects, the Applicant does not consider that the linear tree planting along Alderton Road would result in the loss of characteristically open views	See Applicant's response to SLD-182 above re linear tree planting along Alderton Road.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Cotswolds National Landscape	towards / from the CNL. However, conversely, the LVIA also proposes and relies on this planting as a mitigation measure which is *"intended to strengthen existing hedgerows and reinforce field boundaries"* in order to screen views of Lime Down C from the west.	Additionally, Annex C of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** includes Figures P4443_LPR_ZZ_XX_DR_Z_EXA_0371 Sheets 1 to 3 that set out those areas of the Scheme where the Applicant considers that the proposals are providing an enhancement within the setting of the Cotswolds National Landscape rather than providing mitigation. These figures clearly show that the Applicant considers additional tree planting and reinforcement of existing hedgerows alongside Alderton Road to be an enhancement and not mitigation. Mitigation is proposed to the western boundary of the proposed infrastructure, for example along the western boundary of Fields C7, C5 etc.
SLD-202	Landscape and Visual	LV2.7 – Linear Tree	**64.** If it was concluded and agreed that roadside hedgerow trees were not	In consideration of the Applicant's response to SLD-182 above there is no

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Planting in the Setting of the Cotswolds National Landscape	appropriate in this location because they would screen characteristically open views, and should be removed from the Scheme, the LVIA should reassess visual effects accordingly, factoring in both a) the resultant reduction in levels of adverse visual effects arising from the total / partial loss of a previously- open view (if that was assumed in the LVIA), and b) the resultant reduction in levels of adverse visual effects arising from the increase in visibility of the array / infrastructure areas.	requirement to undertake any reassessment of effects within the LVIA. The **LVIA [REP6B-004]** has been prepared with the correct understanding of the approach to tree planting along the boundary with the CNL.
SLD-203	Landscape and Visual	Table 4-5: SLD1-001 re Landscape and Visual – Mitigation	B2 [REP5-098] *Applicant's Response to Deadline 4 Submissions* **4.5 Stop Lime Down – Comments on Deadline 3 Submissions** **Table 4-5: SLD1-001 re Landscape and Visual – Mitigation** **66.** The Applicant's response states that *"some mitigation of visual effects includes landscape enhancements, for*	In response to the example provided here by SLD, the Applicant recognises the terminology used, but this is used in regard to the strengthening of existing landscape fabric components, which colloquially is referred to as to enhance, or hedgerow enhancements. The Applicant maintains its position that it has not double counted landscape / visual mitigation as landscape / visual enhancement noting that within the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			example: strengthening existing landscape fabric components i.e. native field boundary hedgerows and planting new hedgerow trees, woodland, riparian corridor planting etc." (emphasis added).	Overarching National Policy Statement for Energy (NPS) EN-1 recognises at para 5.10.5 that: *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation".*
SLD-204	Landscape and Visual	Table 4-5: SLD1-001 re Landscape and Visual – Mitigation	**67.** Regardless of whether the measures are intended to mitigate **landscape or visual** effects, or both, landscape / visual mitigation cannot be double counted as landscape / visual enhancement (see GLVIA3 para. 3.39: the matter, and the implications, are explained further in Section 7.2 of SLD's LVIR **[REP1-170]**).	Annex C of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** includes Figures P4443_LPR_ZZ_XX_DR_Z_EXA_0371 Sheets 1 to 3 that set out those areas of the Scheme where the Applicant considers that the proposals are providing an enhancement and conversely where the proposals are therefore providing mitigation.
SLD-205	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction	**68.** The Applicant's Tranquillity Assessment scope is primarily focussed on the effects of noise.	The Tranquillity Assessment covers all aspects of tranquillity however given the assessment is focussed on the transport route and associated effects, noise is a key consideration but not the primary focus of the assessment. This is an

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Traffic on CNL		incorrect interpretation of the Tranquillity Assessment.
SLD-206	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**69.** Para. 2.2.7 explains that this approach is due to the *"focus of policy CE5 on noise as an impact upon tranquillity [therefore] this report considers the most appropriate way to assess the effect of the Scheme on tranquillity within the CNL from a noise perspective"*.	The Tranquillity Assessment covers all aspects of tranquillity however given the assessment is focussed on the transport route and associated effects, noise is a key consideration and should be considered alongside other factors affecting tranquillity.
SLD-207	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**70.** Ms Tinkler does **not agree** that the focus on noise is appropriate for the purpose of this exercise.	The report includes noise; however noise is one of several elements impacting tranquillity including aural and visual. This is an incorrect interpretation of the Tranquillity Assessment. The Tranquillity Assessment covers all aspects of tranquillity.
SLD-208	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction	**71.** Para. 2.2.8 goes on to say that *"professional judgement associated with aural, visual and experiential aspects of the CNL considered during a site visit is also a key consideration. In consultation with Wiltshire Council's Landscape*	The Applicant acknowledges this comment and directs to the supporting figures, namely figure 6-12 covering the above consultation and which are considered in the assessment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Traffic on CNL	*Officer aspects such as sound environment modelling, viewshed analysis, distance decay modelling and dark sky mapping were discussed to be included in supporting information and to inform the site visit"*.	
SLD-209	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**72.** However, under the heading *Negative Visual / Experiential / Perceptual*, para. 2.3.6 only includes visual experiences, not non-visual or non-aural experiences, nor other relevant factors.	This information has been covered in section 2.2.11 and considered in the assessment and during the site visit.
SLD-210	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**73.** Broadly, Ms Tinkler **agrees** with the definition of 'tranquillity' set out in the CNL Tranquillity Statement and referenced in the Applicant's report, which is *"a state of calm and quietude associated with peace, experienced in places with mainly natural features and / or historic character, free from man-made noise and other aural and visual disturbance"*. However, there is more to 'tranquillity' than this definition implies,	It is considered relevant that the report references the CNL's own tranquillity assessment (paragraph 2.2.3) and that such a definition is considered appropriate. Tranquillity covers many aspects and reference to the CNL's definition of Tranquillity does not preclude that there are other elements to tranquillity. Tranquillity has been assessed based on this definition and work undertaken in referenced

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			which is important and relevant to the scope of assessments such as this.	documents, the assessment report itself alongside the professional judgement of an experienced chartered landscape architect.
SLD-211	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**74.** Please refer to SLD's LVIR **[REP1-170]** for further information, but firstly and most importantly, **'tranquillity' is not synonymous with 'lack of sound'.**	This is agreed.
SLD-212	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**75.** The glossary of GLVIA3 describes 'tranquillity as '**a significant asset of landscape**'.	This is agreed.
SLD-213	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment	**76.** The Landscape Institute's Technical Information Note (TIN) 01/2017 on the subject explains that *"tranquillity cannot readily be defined as an environmental*	This is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Effects of Construction Traffic on CNL	*characteristic or quality as it is a state of mind that is being described and thus human perceptions as well as factual evidence must be considered in any studies relating to the term. Tranquillity is, in effect,* ***an umbrella term used to refer to the effect of a range of environmental factors on our senses and our perception of a place****"* (emphasis added).	
SLD-214	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**77.** In Wales, the definition of tranquillity that has been adopted by both Welsh Government (Welsh Government 2012) and Natural Resources Wales (NRW 2016a) includes "**feeling safe**".	This is agreed.
SLD-215	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction	**78.** The above factors, especially safety, and contributions to landscape value, are fundamental to a full understanding of effects on tranquillity.	This is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Traffic on CNL		
SLD-216	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**79.** In Ms Tinkler's opinion, where relevant to landscape and visual effects, the Tranquillity Assessment's conclusions cannot be relied upon because these critical factors have not been considered. Ideally, the Assessment should be revised to address these matters.	Such matters raised by Ms Tinkler have been considered in the assessment particularly as part of the site visit and consideration of changes to such experiences as a result of the development. This statement relates to an incorrect interpretation of the **Tranquillity Assessment [REP5-099]** and the Tranquillity Assessments conclusions can be relied upon.
SLD-217	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**80.** Section 3 of the Tranquillity Assessment deals with *Transport Effects*. These matters will be commented upon by SLD's highways expert.	The Applicant notes this comment.
SLD-218	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment	**81.** At para. 9.1.3, the Tranquillity Assessment concludes that *"The impact of the construction route on tranquillity within the CNL and its setting would be*	This is agreed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Effects of Construction Traffic on CNL	*minimal creating aural and visual impact upon a focused section of the route principally affecting rural roads between the site access at Site A and the junction of Alderton Road/Church Road"*.	
SLD-219	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**83.** A detailed assessment of landscape and visual effects arising along the proposed construction routes, both within the CNL and its setting, is provided in Section 8.6 of SLD's LVIR **[REP1-170]**.	The Applicant notes this comment.
SLD-220	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**84.** Ms Tinkler's conclusion remains that construction traffic is highly likely to result in significant direct and indirect adverse effects on various aspects of character, and visual and other amenity, and safety, within the CNL and its setting.	Section 8.6 of SLD's LVIR is a Landscape and Visual Impact Report which is different to a Tranquillity Assessment. Its findings in relation to landscape and visual matters are clear as are those presented by the applicant (**ES Volume 1 Chapter 8 Landscape and Visual [REP6B-004]**) which differ from Ms Tinklers assessment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				An assessment in relation to tranquillity was undertaken by an experienced chartered landscape architect and an assessment made accordingly based on professional judgement and the information and guidance set out within the assessment report.
SLD-221	Landscape and Visual	B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL	**85.** Note that whilst the magnitudes of effects of the construction works may be assessed on the basis of them being 'short-term', many of the adverse effects would be significant throughout the duration of the works. Also it must be borne in mind that some effects could be permanent, for example damage to / loss of irreplaceable features / habitats along the route.	In landscape and visual terms adverse landscape and visual effects and impacts are set out in (**ES Volume 1 Chapter 8 Landscape and Visual [REP6B-004]**). It is not clear what specific adverse effects are being referred to. It is not clear what "*damage to / loss of irreplaceable features / habitats along the route*" (emphasis added) refers to and request SLD to specify their precise concerns. Any damage occurred during the works would be repaired in line with the **Outline Construction Environmental Management Plan (CEMP) [REP6-029]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-222	Landscape and Visual	B4 [REP5-101] Applicant's Response SLD Landscape ISH2 Post-Hearing	**B4 [REP5-101] Applicant's Response SLD Landscape ISH2 Post-Hearing** **86.** This document sets out *"responses to the matters raised within Section 2.2 ISH2 – Landscape and Visual Impact and Section 3 Comments on Deadline 3 Submissions as well as commentary to SLDs responses to ExA First Written Questions LV1.6, LV1.7 and LV1.12"*.	The Applicant notes this comment.
SLD-223	Landscape and Visual	Section 2.2: Definition and Assessment of Landscape Fabric and Landscape Character	**Section 2.2: Definition and Assessment of Landscape Fabric and Landscape Character** **87.** This section explains why and how the Applicant arrived at the conclusion that it is acceptable to double count landscape / visual mitigation as landscape / visual enhancement.	The Applicant maintains its position that it has not double counted landscape / visual mitigation as landscape / visual enhancement noting that within the Overarching National Policy Statement for Energy (NPS) EN-1 recognises at para 5.10.5 that: *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation".*
SLD-224	Landscape and Visual	Section 2.2: Definition and	**88.** SLD's *Deadline 5 Submission* **[REP5-130]**, Appendix A, Section A, 1b)	The Applicant maintains its position that it has not departed from guidance and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Assessment of Landscape Fabric and Landscape Character	*Applicant's Response to Other Parties' Responses to ExQ1 [REP4-081]* explains why Ms Tinkler fundamentally **disagrees** with the Applicant's approach – which the Applicant acknowledges is a departure from published guidance with the sole purpose of deriving benefit from acknowledged harm – and should be referred to for further information.	that GLVIA3 does not suggest that an LVIA should consider individual Landscape Character Areas (LCA) or Landscape Character Types (LCT) as individual Landscape Receptors, rather that LCAs/LCTs are used to identify the baseline. However as requested by the ExA, the Applicant has prepared an assessment of Landscape Character effects on the local Landscape Character Areas and Types (**Limestone Lowlands Character Assessment [REP6B-008]**). It should be noted that GLVIA3 is not a prescriptive methodology for undertaking Landscape and Visual Impact Assessment (LVIA) but rather provides a framework of principles and good practice within which professional judgement is applied.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Landscape Institute's Technical Guidance Note LITGN-2024-01 Published August 2024, Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) sets out that the purpose of LVIA is to communicate the landscape professional's judgement about changes to landscape and views, and that achieving that outcome is more fundamental to good LVIA than the detailed mechanics of a particular methodology. It also expressly says on Page 1 that *"variation and debate are to be expected rather than discouraged."* And that whilst *"GLVIA3 provides a structured process for assessing effects on landscape and visual resources. The responsibility of the assessor is to tailor it to the place and project under consideration, supported by an explanation of the rationale behind the approach taken."*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-225	Landscape and Visual	B5 [REP5-102] Mitigation Route Map	**B5 [REP5-102] Mitigation Route Map** **89.** This document has been prepared in response to ExQ GCT1.6, which asks the Applicant to provide *"a single document containing a mitigation route map of the controls and mitigation measures that have been identified across a number of documents…"*.	The purpose of the **Mitigation Route Map [REP5-102]** is to provide a consolidated source of information identifying how the environmental measures and commitments identified through the Environmental Statement and subsequently during the Examination relate to the Scheme's control documents and the mechanisms through which they are secured. It is not intended to revisit or redefine the distinction between mitigation, enhancement and other management measures, which has been addressed elsewhere during the Examination. This purpose is expressly set out at paragraphs 1.1.2–1.1.5 of the Mitigation Route Map. In respect of landscape and visual matters specifically, the Applicant has addressed the relationship between mitigation and enhancement most

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				recently in **Applicant's Response to Landscape and Visual Matters raised in Stop Lime Down Issue Specific Hearing 2 Post Hearing Summary [REP5-101]**, Section 2.3. This explains that the Scheme incorporates avoidance, protection and landscape planting as embedded mitigation, while also providing distinct positive enhancement measures intended to further the purposes of the CNL.
SLD-226	Landscape and Visual	B5 [REP5-102] Mitigation Route Map	**90.** The document is helpful; however, despite its purpose being to identify **mitigation** measures, a) certain items are included as **enhancements**, and b) it has previously been agreed that some of the enhancements are mitigating measures.	See Applicant's response to SLD-225 above.
SLD-227	Landscape and Visual	B5 [REP5-102] Mitigation Route Map	**91.** For example, on page 30, the objective of the proposal to maintain hedgerows at their current height of c. 1.5m bordering the CNL is described as being *"To avoid and reduce impacts and*	See Applicant's response to SLD-225 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			effects on the CNL", ie mitigation, but is called *"Enhancement"*.	
SLD-228	Landscape and Visual	B5 [REP5-102] Mitigation Route Map	**92.** Also, on page 31, the objective of the proposal to retain *"The reinforced [operational] landscape ['fabric']"* post-commissioning is *"To reduce the long term visual effect and impact of the Scheme"*, and this is described as *"Enhancement"*.	See Applicant's response to SLD-225 above.
SLD-229	Landscape and Visual	B5 [REP5-102] Mitigation Route Map	**93.** Regarding the latter, as explained in previous submissions and summarised above, firstly, whether post-decommissioning effects can be described as so-called 'legacy landscape' benefits depends on whether the operational mitigation and enhancement 'fabric' planting measures are retained and, if retained, whether they would continue to give rise to the acknowledged adverse landscape and visual effects that would arise during operation.	See Applicant's response to SLD-225 above.
SLD-230	Landscape and Visual	B5 [REP5-102]	**94.** Secondly, currently, none of the post-decommissioning proposals are	At decommissioning other than the buried cabling, all infrastructure would

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Mitigation Route Map	secured or controlled under the draft DCO. In summary, the current Outline Decommissioning Strategy (Rev 4) **[REP5-075]** provides for the removal of all infrastructure and other 'hard' / man-made Scheme elements from the fields, and an assessment to be undertaken in respect of whether hedgerows should be removed, having regard to best ecological and land management practices. However, the Strategy does not address the removal of the 'soft' / natural 'fabric' mitigation / enhancement measures, such as trees, hedges, and species-rich meadows.	be removed with agricultural fields returned to landowner control. Following decommissioning and the return of the land to the relevant landowner, any subsequent management, alteration or removal of habitats established as part of the Scheme will be subject to, and undertaken in accordance with, the relevant environmental legislation and regulatory requirements in force at that time.
SLD-231	Landscape and Visual	B6 [REP5-103] Limestone Lowlands Character Assessment	**B6 [REP5-103]** ***Limestone Lowlands Character Assessment*** **95.** This document comprises the Applicant's assessment of effects on Landscape Types and Character Areas, undertaken following Action Point 14 and 15 from ISH2 **[EV8-010]**, specifically, (AP14) effects on the Limestone Lowland landscape type and	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			its sub-divided Landscape Character Areas, and (AP15) cumulative effects assessment for Limestone Lowland and Hullavington Rolling Lowland, considering *"whether the key characteristics of the character types would be so changed by the cumulative developments as to transform it into a different landscape type"*.	
SLD-232	Landscape and Visual	B6 [REP5-103] Limestone Lowlands Character Assessment	**96.** The assessment's conclusions about beneficial effects are based on the Applicant having erroneously double counted landscape / visual mitigation measures as landscape / visual enhancements (as explained in SLD's previous submissions and above).	The Applicant maintains its position that it has not double counted landscape / visual mitigation as landscape / visual enhancement noting that within the Overarching National Policy Statement for Energy (NPS) EN-1 recognises at para 5.10.5 that: *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation".*
SLD-233	Landscape and Visual	B6 [REP5-103] Limestone Lowlands	**97.** For example, in Table 1: *Effects on the Host LCA 8: Hullavington Rolling Lowland Character*, the row *Medium sized woodlands and deciduous copses*	The statement made by SLD is not a full representation of the findings of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Character Assessment	states that *"The substantial provision of new planting combined with the minimal losses to accommodate the Scheme are the driver behind the beneficial effects associated with the Landscape Fabric of the Scheme as assessed in the LVIA"*; however, this planting is a mitigation measure required to screen views. See also para. 1.6.10 item 4, which is called *"The benefits of mitigation"*.	**Limestone Lowlands Character Assessment [REP6B-008].** The quotation by SLD is in relation to one of the key features of the landscape '*continuous hedges with many mature oaks*', however this benefit is further considered in relation to the overall adverse effects associated with the solar infrastructure, which results in an overall Moderate / Minor Adverse effect to the Character of LCA 8 at all stages of the assessment. Overarching National Policy Statement for Energy (NPS) EN-1 recognises at para 5.10.5 that: *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation".*
SLD-234	Landscape and Visual	B6 [REP5-103]	**98.** Para. 1.6.3 confirms the LVIA's conclusion (with which Ms Tinkler	The **Limestone Lowlands Character Assessment [REP6B-008]** has undertaken an assessment of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Limestone Lowlands Character Assessment	**agrees**) that there would be a *"significant level of effect within the 1km Study Area"* (both direct and indirect effects). Ms Tinkler **agrees** that the level of effect *"dissipates with distance"*.	individual Landscape Types and Character Areas instead of Study Areas as was undertaken in the LVIA, the outcomes of the two assessments are different. This is predominantly due to the different geographical extents of the Types and Areas being assessed. The **LVIA [REP6B-004]** concludes significant adverse effects on the 1km local study area – However, this change does not directly affect the CNL as the buffers to the development provided by the avoidance measures and layers of proposed mitigation planting to the arrays would contain the development away from the edge of the CNL. The **Limestone Lowlands Character Assessment [REP6B-008]** concludes that there are no direct landscape effects on the Sherston Dipslope or the Upper Avon Valley within the CNL and there are only low levels of change (both

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				positive and negative) to the perceptual and aesthetics qualities of a limited number of key features and there would be a Very Low overall level of change at all stages of the assessment resulting in Negligible Adverse indirect Effects to landscape character within the CNL. Having considered the changes to the key features of LCA 8 the effects on the overall landscape character of LCA 8 are considered to be Moderate / Minor Adverse at all stages of the assessment. Overarching National Policy Statement for Energy (NPS) EN-1 recognises at para 5.10.5 that: *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation".*
SLD-235	Landscape and Visual	B6 [REP5-103] Limestone Lowlands	**99.** Ms Tinkler **agrees** with the Applicant that this is a complex assessment with many different factors involved. That is mainly due to the very large size of the	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Character Assessment	Scheme and the fact that it covers several landscape areas and types, within which there is a wide variety of landscape characteristics, qualities, functions and other aspects. Some of the variations which occur are notable, but being localised, may not feature in published character assessments, most of which cover large geographical areas. The assessment is further complicated by there being different published character assessments which cover different parts of the study area but overlap, with the approach and relevant factors in each being slightly different.	
SLD-236	Landscape and Visual	B6 [REP5-103] Limestone Lowlands Character Assessment	**100.** In this regard, broadly, Ms Tinkler **agrees** with the assessment's adopted approach and method, albeit concerns previously expressed about certain aspects of both still apply, meaning that levels of effects may have been underestimated.	The Applicant welcomes SLDs agreement regarding the approach and method undertaken in producing the **Limestone Lowlands Character Assessment [REP6B-008]**.
SLD-237	Landscape and Visual	B6 [REP5-103] Limestone	**101.** However, Ms Tinkler **agrees** that the development would result in significant direct effects on all the host	The Applicant recognises that the character of the landscape with the Scheme would be fundamentally altered

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Lowlands Character Assessment	character types and areas, and significant indirect effects on parts of them, extending at least 1km from the site but probably more.	and therefore Significantly Adversely Effected as a consequence of the Development. The landscape would change from greenfield land to a renewable solar scheme and is considered to represent an adverse effect of the highest level (Major Adverse and Significant). However, due to the dispersed nature of the Sites within the Scheme, the strong framework of existing vegetation and the nature of the topography of the receiving landscape the adverse effects of the Lime Down Scheme on the wider landscape dissipates quickly with distance.
SLD-238	Landscape and Visual	B6 [REP5-103] Limestone Lowlands Character Assessment	**102.** Ms Tinkler also **agrees** that in terms of the effects on the types / areas when considered as a geographic whole, effects would not be 'significant' due to the relatively small percentage of the type / area being affected.	The Applicant welcomes this acknowledgement from SLD.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-239	Landscape and Visual	B6 [REP5-103] Limestone Lowlands Character Assessment	**103.** The same applies to cumulative effects on the types / areas, with significant direct effects arising from the identified developments on the host character types and areas, and significant indirect effects on parts of them, but if each type / area is considered as a geographic whole, cumulative effects would not be 'significant'.	The Applicant welcomes this acknowledgement from SLD.
SLD-240	Landscape and Visual	B6 [REP5-103] Limestone Lowlands Character Assessment	**104.** However, it must be noted that within the host Hullavington Rolling Lowland and Malmesbury – Corsham Limestone Lowlands character areas, which are relatively large, in combination with Lime Down there would be a high number of large scale, industrialising developments throughout the area which may not change the overall key characteristics to the point where the area tips from being a rural area containing large-scale, industrialising development to one which has an 'industrialised character', but would nonetheless fundamentally change the	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			ways in which the whole area is experienced.	
SLD-241	Landscape and Visual	3.4.22 Protected / Valued Landscape Status	**C) Updated Documents Submitted at D5 (Applicant) C1 [REP5-088]** **Applicant SoCG with Wiltshire Council (Rev 3) (Tracked)** ***3.4.22 Protected / valued landscape status***	The Applicant notes this comment.
SLD-242	Landscape and Visual	3.4.22 Protected / Valued Landscape Status	**105.** This matter is currently **Agreed** between the two parties.	The Applicant notes this comment.
SLD-243	Landscape and Visual	3.4.22 Protected / Valued Landscape Status	**106.** The Applicant's response states, *"The Applicant agrees that Lime Down Sites A, B and C are within the setting of CNL and have a higher value than Lime Down Sites D and E"*. **107.** The Applicant's response goes on to say that *"In ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] the*	The Applicant notes this comment. However, on further consideration this statement should read as below: *"In ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] the CNL, as a designated landscape is assessed as High Value, High Susceptibility and High Sensitivity. Lime Down Sites A, B and C*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			CNL, as a designated landscape is assessed as High Value and High Sensitivity. Lime Down Sites A, B and C within the 1km and 2km Study Areas which are within the setting of the CNL are assessed as ***High to Medium Value*** *and High to Medium Sensitivity"* (emphasis added).	*within the 1km and 2km Study Areas which are within the setting of the CNL are assessed as High Value Medium Susceptibility and High to Medium Sensitivity."*
SLD-244	Landscape and Visual	3.4.22 Protected / Valued Landscape Status	**108.** Firstly, note that in **[REP3-045]** Appendix 8-3-2-2: *Landscape and Visual Assessment Sheets (Significant)* (Tracked), Lime Down Sites A, B and C are reported as being of **High** value, not **High to Medium**. It would be helpful if the Applicant could clarify which is correct.	The Applicant confirms that it considers Sites A, B and C to be of High Value, Medium Susceptibility and High to Medium Sensitivity.
SLD-245	Landscape and Visual	3.4.22 Protected / Valued Landscape Status	**109.** Secondly, the Applicant has confirmed that only 'parts' of Lime Down A, B and C are within the setting of the CNL. However, the LVIA does not differentiate between the levels of value and sensitivity of the parts of Lime Down A, B and C which are within the CNL's	The Applicant respectfully disagrees with SLD on this matter and would like to clarify that what SLD refer to here as '*Areas*' (Sites A – E) have not been assessed or '*treated in this way*' with the same level of landscape value.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			setting, and those which are not. Therefore, in Ms Tinkler's opinion (and notwithstanding the differences of opinion about the extent of the setting, as explained in SLD's responses), it would be helpful if the LVIA was revised to factor in the differences in levels of value.	In accordance with the Landscape Institute Technical Guidance Note 02/21 (TGN 02/21), Assessing landscape value outside national designations', the Applicant has undertaken an assessment of the landscape value of the 5 different Lime Down Sites, and has identified Sites A, B and C as being of High Value. The Applicant has identified that the value of the landscape decreases from east to west with Sites D and E being identified as Medium Value. The Applicant understands from SLDs comments that Ms Tinklers position to be that where land is identified as being within the setting of a National Landscape it should be considered to be high value. The Applicant does not agree with this position as landscape value is derived from many varying factors, and whilst

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				being within the setting of a National Landscape may be an indicator to its value, must not be the only consideration. Conversely, where land is outside of the setting of a national landscape, it should not be considered to not being of high value. The intention of TGN 02/21 has been written for precisely this purpose, to provide information and guidance to landscape professionals (and others) who need to make judgments about the value of a landscape outside of National Landscape designations.
SLD-246	Landscape and Visual	LV2.1 Time Limited Enhancements	**D) Documents Submitted at D5 (Others) D1 [REP5-140]** **Natural England Response to ExQ2** **LV2.1 *Time Limited Enhancements*** 110. Comments on Natural England's response to LV2.1 are in Section B1 *Applicant's Response to the Examining*	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Authority's Second Written Questions above.	
SLD-247	Landscape and Visual	LV2.2 – Furthering the Purposes of the Cotswolds National Landscape	**111.** This question is to Natural England, asking whether they consider that the proposed development demonstrates that enough has been done to fulfil the duty to seek to further the purpose of the CNL.	The Applicant notes this comment.
SLD-248	Landscape and Visual	LV2.2 – Furthering the Purposes of the Cotswolds National Landscape	**112.** *"Natural England is satisfied that,* ***provided the ecological enhancements delivered by the scheme within the setting of the CNL are retained following decommissioning****, the agreed measures would help meet the statutory duty under Section 85 of the CRoW Act to further the purposes of conserving and enhancing the natural beauty of the national landscape during the operational phase of the development and beyond"* (emphasis added).	The Scheme is proposed on a temporary basis. The Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. As such, the Scheme would be required to be decommissioned and the land returned to landowner control and any subsequent management, alteration or removal of habitats established as part of the Scheme would be subject to, and undertaken in accordance with, the relevant environmental legislation and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				regulatory requirements in force at that time.
SLD-249	Landscape and Visual	LV2.2 – Furthering the Purposes of the Cotswolds National Landscape	**113.** As explained above, the Applicant has stated that it must be assumed that the operational enhancements would **not** be retained following decommissioning, because *"The Applicant cannot control what is done with these elements on decommissioning"* (**[REP5-097]** Applicant's response to ExQ LV2.1).	See Applicant's response to SLD-248 above.
SLD-250	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**LV2.5 – *Setting of the Cotswolds National Landscape*** **114.** This question is to Natural England, asking if it agrees with the Applicant's response to ExQ1 LV1.9 **[REP3-128]** which includes a plan showing what the Applicant considers to be the spatial extent of the area that it considers forms the CNL's setting. If it does not agree, Natural England is asked to define the spatial extent of the area that it considers forms the CNL's setting.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-251	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**115.** *"Natural England does not agree with the applicant's definition of the setting of the Cotswolds National Landscape in spatial terms"*. **116.** Natural England's response is helpful, as it clarifies the spatial extent of the CNL's setting, and how it is determined (this being the subject of ExQ1 LV1.9).	The Applicant has identified the setting of the CNL to be defined by the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the CNL.
SLD-252	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**117.** This matter is explained in more detail in SLD's *Deadline 5 Submission* **[REP5-130]** Appendix A, Section A, 1c) *Written Summary of Applicant's Oral Submissions and Responses at ISH2* [REP4-085].	The Applicant notes this comment.
SLD-253	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**118.** In summary, the definition of setting provided by the CNLB is the correct starting point for effects assessments, ie it is *"the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design can be considered to have an impact, positive or negative, on*	The Applicant agrees with the CNLB on this definition but disagrees on the extent of the setting of the CNL. The Applicant has set out their understanding of the extent of the setting of the CNL within Annex E LV1.9

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the landscape, scenic beauty and special qualities of the Cotswolds AONB."	– Spatial Extent of the Setting of the Cotswold National Landscape of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**.
SLD-254	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**119.** At this stage, the **levels** of the effects are irrelevant: they are assessed once the setting's full extent is established.	The Applicant notes this comment, and has set out their understanding of the setting of the CNL within Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128].**
SLD-255	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**120.** Note that Natural England's response states that *"the applicant does not specify the methodology that was used for identifying the spatial extent of the setting of the CNL. As such, it is not possible for Natural England to state that it agrees with the applicant's definition of the setting of the CNL"*.	The Applicant met with representatives from Natural England on the 28th of August to discuss the Lime Down Solar Project and their latest comments. The issue of setting was discussed during this meeting and it was discussed that the Applicant and Natural England have a different consideration to the extent of the setting of the CNL in relation to the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-256	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**121.** Para. 2.1.21 of Ms Tinkler's response to LV1.9, in SLD's **[REP3-173]** also asked the Applicant to explain the criteria which were used for this exercise – they appeared to be based on areas within which landscape and visual receptors within the CNL would experience the highest levels of indirect effects.	The Applicant has identified the setting of the CNL to be defined by the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the CNL.
SLD-257	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**122.** However, in their responses to this question in **[REP5-097]**, the Applicant has now confirmed that the CNLB's definition is agreed and accepted, stating *"The Applicants position is that the setting for the CNL extends as far as to where development or land management proposals, can be considered to have an impact upon the CNL"*.	The Applicant notes this comment.
SLD-258	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**123.** Until the Applicant's new 'augmented' ZTV plans **[REP4-085]** were provided, as well as Ms Tinkler it appears that other parties had assumed the LVIA was correct in finding no	ZTV mapping is the desk study component of the visibility analysis. ZTV identifies land that, theoretically, is visually connected with the proposal, however in reality this often produces an overestimation of potential visibility of a

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			intervisibility / interinfluence between Lime Down D and E and the CNL. Therefore, no indirect effects on the CNL would arise from sites Lime Down D and E, and therefore, Lime Down D and E are not within the CNL's setting.	Scheme, as in actuality there are often many layers of vegetation or other features across the landscape that are not captured by the ZTV modelling that could affect visibility. The Applicant confirms that extensive site work has been undertaken at varying points across the year to allow appraisal of the site, the receiving and wider landscape to account for seasonal variation, which has included accompanied site visits with representatives of both the CNLB and WC. This has been supported with viewpoint photography and photomontage, including those additional viewpoints requested by the CNLB and WC. Through their extensive on Site assessment, the Applicant has not found

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				any intervisibility between land within Lime Down Sites D or E and the CNL. The Applicant does not consider any of Site D or E are within the setting of the CNL.
SLD-259	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**124.** Regarding **intervisibility**, Natural England's response states that *"All parts of the development that would be visible from the CNL should be included in the setting"*.	The Applicant has not found any intervisibility between land within Lime Down Sites D or E and the CNL. The Applicant does not consider any of Site D or E are within the setting of the CNL.
SLD-260	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**125.** The ZTV plans show that in fact, there **is** the potential for intervisibility between the CNL and the part of the Scheme furthest from the CNL, ie the eastern end of Lime Down E, at Seagry Wood.	See Applicant's response to SLD-258.
SLD-261	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**126.** Natural England says that *"Consideration should also be given to locations where the proposed development (including associated infrastructure) would impact on views looking towards the CNL from*	The Applicant has considered both views to and from the CNL. An example of the Applicants consideration of this issue is demonstrated by the removal of Fields C2, C3 and C4 from the Application and the avoidance of panels

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			viewpoints outside the CNL. It is not clear whether this has been done in the applicant's mapping of the CNL setting". The ZTV plans show that there are areas several kilometres beyond Lime Down E where visual receptors could potentially see the CNL with not just Lime Down E in the view, but the rest of the Lime Down sites, extending westwards / northwards.	within Field C1 and C6 where the Applicant has sought to maintain views towards St Gile's Church at Alderton from PRoW WT|LUCK|35 (TP077) which is located outside of the Order Limits but from which views of the church within the CNL are possible. Another example is from PRoW WT|SHER|15 (TP027) within Field A11 where panels have been avoided to maintain views into the CNL and of the Church of the Holy Cross in Sherston. Both examples demonstrate where the Applicant has recognised the importance of key views to features or waymarks within the CNL and responded appropriately through the design and layout of the scheme.
SLD-262	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**128.** Regarding **interinfluence** (which requires consideration of both the visual and non-visual aspects of character), with reference to the Government's Natural Environment PPG, Natural England concludes that *"the landscape character within the CNL and adjoining*	The Applicant disagrees with NE's statement that the character of the landscape adjoining the CNL is complementary to that of the character of the landscape within the CNL itself. This is evidenced by the Landscape Character Assessment for North

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the CNL is complementary", and that *"At the very least, the setting should be considered to include those parts of LCT 16 (Limestone Lowlands), outside the CNL, that lie between the CNL boundary and the Lime Down site, as well as those parts of LCT 16 within the site that are visible from the CNL"*.	Wiltshire which identifies the Hullavington Lowlands as a separate character area to those within the CNL – noting that all of the LD Scheme is located within the Hullavington Lowlands Landscape Character Area. This is further expanded upon in the Applicants assessment of effects on the Limestone Lowlands contained within the **Limestone Lowlands Character Assessment [REP6B-008]**. The Applicants position is that there is a distinct difference in the character of the landscape within the CNL and that within the Scheme, evidenced through the difference in key features such as lack of dry-stone walls, condition, field pattern and land use.
SLD-263	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**129.** Natural England's response also identifies other aspects of 'landscape' and potential effects upon them which are a factor in determining the spatial extent of setting, ie tranquillity, dark	The Applicant recognises these aspects, but maintains its position regarding what constitutes the extent of the CNL with regard to the Lime Down Solar Project.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			night-time skies, and ecological connectivity, all of which could extend the setting even further than assumed.	
SLD-264	Other Environmental Matters – Glint and Glare	LV2.5 – Setting of the Cotswolds National Landscape	**130.** Another factor is the effects of glint and glare, which can extend for many kilometres. As stated in previous responses, in SLD's glint and glare expert's opinion, the Applicant's method is flawed, and levels of effects are likely to be higher / effects would extend further than assumed.	Although glint and glare has no specific distance at which glare may be visible (as this varies according to the surrounding terrain) views at greater distances from the development are considered less significant due to diminishing intensity and that these reflections would make up a smaller part of an observer's field-of-view. It is therefore typical to model impacts towards ground-based receptors within 1km of the nearest PV areas, as this is the region where effects may be deemed significant to safety or amenity. Any effects outside of this 1km assessment area would constitute no greater than a low impact and thus would not require mitigation.
SLD-265	Landscape and Visual	LV2.5 – Setting of the	**131.** In addition, Natural England states, *"it may be appropriate to definite [sic]*	The Applicant has identified the setting of the CNL to be defined by the area within which development and land

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Cotswolds National Landscape	*the setting of the CNL separately, in spatial terms, for the construction phase and operational phase. If just one spatial definition of the setting is used, this should address both the construction phase and the operations phase, not just the operational phase"*. Ms Tinkler **agrees** with this recommendation.	management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the CNL.
SLD-266	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	**132.** However, as mentioned previously, notwithstanding the above, and as explained in **[REP5-130]** (Appendix A, Section A, 1c) *Written Summary of Applicant's Oral Submissions and Responses at ISH2*), in EIA / LVIA, the emphasis is on the receptors who / which would experience 'significant' effects (although consideration must also be given to effects which in themselves are not 'significant', but when combined, would become 'significant').	Following the removal of infrastructure from Fields C9 and the southern section of A1 there are no longer any Significant Adverse effects to receptors within or on the boundary of the CNL. There are also no Significant Adverse effects to the landscape character of the land within the CNL. See Applicant's response to SLD-167 above.
SLD-267	Landscape and Visual	LV2.5 – Setting of the	**133.** In terms of the CNL's setting, the parties appear to agree that 'significant'	The Applicant has set out their understanding of the extent of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Cotswolds National Landscape	indirect landscape, and visual effects would occur west of the Fosse Way, so that is where attention has been focussed (notwithstanding a wider setting may be inferred from the new ZTV plans). However, the parties do not agree about the **levels** of effects west of the Fosse Way.	setting of the CNL within Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**.
SLD-268	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	**LV2.6 – *Effects to the Cotswolds National Landscape and its Special Qualities*** **134.** Natural England highlights concerns about the 'significant' effects of construction traffic travelling through the CNL during construction and decommissioning, especially on the CNL's Special Quality 9, tranquillity.	The Applicant welcomes NEs confirmation that other than Special Quality – Tranquillity (the tranquillity of the area away from major sources of inappropriate noise, development, visual clutter and pollution), no other Special Qualities could be significantly impacted by the Scheme. The Applicant confirms that the **Tranquillity Assessment - Effects of Construction Traffic on the Cotswolds National Landscape [REP5-099]** was submitted into examination at Deadline 5 which sets out the Applicant's assessment of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				impact that the construction traffic would have on Special Quality 9.
SLD-269	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	**135.** However, *"Based on the applicant's assessment... Natural England consider that the scheme is unlikely to result in significant adverse impacts on the remaining special qualities"*. **136.** Ms Tinkler **agrees** that the Scheme is unlikely to result in significant adverse impacts on the remaining Special Qualities.	The Applicant welcomes confirmation from SLD that other than the temporary effects of construction traffic on Special Quality 9– Tranquillity the Scheme is unlikely to result in significant adverse impacts on the remaining Special Qualities.
SLD-270	Landscape and Visual	D2 [REP5-128] CNLB Responses to ExQ2	**D2 [REP5-128] *CNLB Responses to ExQ2*** **LV2.1 *Time Limited Enhancements*** **137.** Comments on the CNLB's response to LV2.1 are in Section B1 *Applicant's Response to the Examining Authority's Second Written Questions* above.	The Applicant notes this comment.
SLD-271	Landscape and Visual	LV2.4 Matters Raised at ISH2	**LV2.4 *Matters Raised at ISH2*** **138.** Under the heading ExQ2 *LV2.4: Matters Raised at Issue Specific*	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Hearing 2, the CNLB is asked to confirm if there is agreement with the Applicant in relation to three matters:	
SLD-272	Landscape and Visual	Extent of CNL Setting	1) Extent of CNL setting **139.** The CNLB is asked to confirm if there is agreement with the applicant in relation to: 1) *"The extent of the setting of the CNL as set out in the applicant's response to ExQ1 LV1.9 [REP3-128] (Annex E)"*.	The Applicant notes this comment.
SLD-273	Landscape and Visual	Extent of CNL Setting	**140.** Previously, the CNLB had assumed that the LVIA had concluded that the whole of sites Lime Down A, B and C are within the setting of the CNL; however, the LVIA is ambiguous, and elsewhere states that only 'parts' of Lime Down A, B and C are within the setting.	The Applicant reaffirms its position that parts of Sites A, B and C are within the setting of the CNL. The Applicant has set out their understanding of the extent of the setting of the CNL within Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**.
SLD-274	Landscape and Visual	Extent of CNL Setting	**141.** The Applicant has now confirmed that only 'parts' of Lime Down A, B and	See Applicant's response to SLD-273 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			C are within the setting. The area covered is less than had been assumed.	
SLD-275	Landscape and Visual	Extent of CNL Setting	**142.** *"The Board does not agree with the applicant's assessment and considers the setting of the CNL to be more extensive than that showed in the Annex E plan."*	The Applicant notes this comment.
SLD-276	Landscape and Visual	Extent of CNL Setting	**143.** Ms Tinkler **agrees** that the setting of the CNL is more extensive than that shown in the Annex E plan, and also, with the CNLB's comment that *"intervisibility is one aspect of setting"*, the other being interinfluence / association in terms of nature, culture, function and other factors. This applies to LVIA and heritage assets: see for example Historic England's publication *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition), page 2, 5th para. of *Part 1: Settings and Views*.	The Applicant notes this comment. The Applicant considers the setting of the CNL to extend across parts of Lime Down A, B and C, but not across the entirety of the three sites. The Applicant has set out their understanding of the extent of the setting of the CNL within Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-277	Landscape and Visual	Extent of CNL Setting	**144.** The extent of the CNL's setting is discussed in more detail above, in comments on LV2.5 – *Setting of the Cotswolds National Landscape*.	See Applicant's response to SLD-251 to SLD-267 above.
SLD-278	Landscape and Visual	Removal of Panels from Lime Down A	**2) Removal of panels from Lime Down A** 145. *"Having reviewed the Works Plans and photomontages provided by the applicant, the Board does not support the location of panels within the southern part of Field A1 and recommends that they should be removed from the scheme".*	Following a meeting with a representative from the CNLB on the 12th August 2026 the Applicant has agreed to remove panels from the southern section of Field A1.
SLD-279	Landscape and Visual	Removal of Panels from Lime Down A	**146.** SLD **agrees** that panels within the southern part of Field A1 should be removed from the scheme.	See Applicant's response to SLD-278 above.
SLD-280	Landscape and Visual	Effects on Dark Night Skies	**3) Effects on dark night skies** **147.** SLD **agrees** that so long as controlled through a detailed OEMP, the proposed temporary and security lighting is *"unlikely to have a significant*	The Applicant welcomes confirmation from SLD that the proposed temporary and security lighting is "*unlikely to have a significant adverse effect on the CNL's dark skies*".

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			adverse effect on the CNL's dark skies", and that *"The construction environmental management plan must be substantially in accordance with the outline construction environmental management plan"*.	

Table 3-11 Stop Lime Down – Appendix B: Climate Response [REP6-081]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-281	Climate Change and Energy Need	Background	**University of Derby's (UoD) response to REP5-023 and REP5-108 of 18th August 2026** **Introduction** **1.1 Background** This report concerns our response to the Applicant's two recent documents: • **[REP5-108]:** The Applicant's Climate Change Response to Stop Lime Down Appendix D: University of Derby's response to [REP3-132] – dated August 2026 • **[REP5-023]:** The Applicant's updated Environmental Statement Volume 1 Chapter 7: Climate Change Revision 2 –	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			dated August 2026 (draft version)	
SLD-282	Climate Change and Energy Need	Background	The updated Environmental Statement **[REP5-023]** represents a considerable update of their original statement **[APP-059]** in which various factors have been addressed, including: updated Greenhouse gas (GHG) emissions, PV panel number increase resulting in updated energy outputs, PV panel emissions are now addressed using an Environmental Product Declaration (EPD) and comments that address UoD's (and ExQ2's) questioning of how emissions payback of the Scheme is accounted for.	The Applicant notes this comment.
SLD-283	Climate Change and Energy Need	Background	Unfortunately, given the short timeline between Submissions 5 and 6, it will only be possible to comment on the updated ES **[REP5-023]** in superficial terms. There is insufficient time to feasibility-check the individual updated GHG calculations, so we have accepted these verbatim). In addition,	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			[REP5-108] is also highly informed by the updated ES **[REP5-023]**.	
SLD-284	Climate Change and Energy Need	Background	The **ExQ2 (CC2.2)** had requested a number of issues to be addressed by the Applicant in light of comments made by the Universities of Exeter and Derby (UoE and UoD respectively) through their submissions by Wiltshire Council **[REP1-138]** and Stop Lime Down (SLD) **[REP1-182]** respectively. These were: • Recommendation to use Environmental Product Declarations (EPD) to calculate GHG emissions and derive a carbon payback period. • An estimate of payback from the Applicant. • Response to queries raised re: o Increased GHG inventory. o Panel number increase in constrained land area. o Panel configuration.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-285	Climate Change and Energy Need	UoDs Response to REP5-108	The table below summarises UoDs comments according to the subsequent Applicant responses. As already indicated above, this document is informed by the updated ES [**REP5-023].**	The Applicant notes this comment and has responded in full below in **Table 3-14.**

Table 3-12 Stop Lime Down – Appendix B: Climate Response – Response to REP5-108 [REP6-081]

Section No	Summary of applicant Response (as given in REPs 5-108)	Comments from UoD in reply	Applicant's Response
Emissions calculations			
2.1.6	Updated GHG emissions: the Applicant does not consider that UoD's suggested increase in GHG inventory would make a significant change to the results presented in the updated ED **[REP5-023]**	UoD do not have sufficient time to review figures in updated ES but it appears that Applicant's GHG emissions are greater than UoD's suggested emissions, in any case. So these have been accepted verbatim in our calculations for net savings (section 3.0 of this report)	The Applicant notes this comment.

Section No	Summary of applicant Response (as given in REPs 5-108)	Comments from UoD in reply	Applicant's Response
2.17-2.1.9	Updated ES **[REP5-023]** reflects updated energy output for fixed and tracker panels (560 and 442.3 GWh resp), updated degradation profile (1% in year 1, 0.35%) and increased fixed panel number to 842,000.	Comment noted and used in the UoD's estimate of Net Savings (section 3.0 of this report)	The Applicant notes this comment.
Energy Output			
3.1.1-3.1.6	These sections question Uod's modelling approach. UoD had also questioned apparent reversal of fixed and tracker energy outputs. This has been explained in updated ES [**REP5-23**] as it being possible to incorporate more fixed panels than trackers onto available site.	UoD note this point. Unfortunately, the UoD does not have sufficient time in advance of Deadline 6 to verify the energy outputs using updated 18o and 7.5m for this response, other than using Global Solar Atlas.	The Applicant notes this comment.
Payback year			
5.1.1-5.2.5	This section concerns discussion re: UoD's use of payback/break-even approach (where the Grid outperforms the Scheme after 2033 according to DESNZ, 2023), this is summarised as follows:	Whilst the UoD takes on a lot of these points and the situation is certainly "which came first, chicken or egg" and without such Schemes, the UK Grid will not decarbonise, the UoD still has concerns in respect of the comparison of the Scheme with the	This point has been responded to within 5.1.1 in **Climate Change Response to Stop Lime Down Appendix D: University of Derby's response to [REP3-132] [REP5-108]**. In summary, the Applicant compared the lifecycle greenhouse gas intensity of the Scheme

Section No	Summary of applicant Response (as given in REPs 5-108)	Comments from UoD in reply	Applicant's Response
	• UoD's payback analysis has different analytical purpose to comparison represented in ES and although UoD's analysis provides context it does not detract from ultimate lifecycle emissions calculated for Scheme • The Applicant comments that without Schemes like this, the UK Grid will not de-carbonise. • The Scheme presents Net Savings within the lifetime of the Scheme. • The comparison of the Scheme with the UK Grid is not a "like-for-like basis" – the Scheme is based on global and lifetime GHG emissions, whereas the UK Grid is based on territorial and operational emissions. • The Scheme represents an emissions saving and supports trajectory to Net Zero (as Grid average during proposed development's operation will include fossil fuels).	first year of operation (2029) and how Net Savings are ultimately calculated. These concerns have been detailed in Section 3.0 of this report. Regarding the comparison with CCGT as baseline, would it be possible to include this comment and associated calculations behind it in the updated ES [**REP5-023**]?	with the projected UK grid carbon intensity in the first year of operation (2029) to provide context regarding the carbon performance of the Scheme at the point electricity generation commences. The Applicant acknowledges the alternative calculation presented by UoD, which applies the DESNZ projected grid carbon intensity pathway on a year-by-year basis over the operational lifetime of the Scheme. This provides a useful sensitivity illustrating the effect of an assumed future decarbonisation trajectory for the UK electricity grid. The Applicant's assessment adopts the projected grid carbon intensity for 2029, the assumed first year of operation of the Scheme, as a fixed and consistent benchmark. The use of this value is not intended to suggest that grid carbon

Section No	Summary of applicant Response (as given in REPs 5-108)	Comments from UoD in reply	Applicant's Response
	• A comparison is made with three other solar farms (Peartree Hill, One Earth and Springwell) (using reference to the combined-cycle gas turbine (CCGT) power carbon intensity). A payback of less than 3 years is quoted for fixed and tracker panels)		intensity will remain unchanged over the operational lifetime of the Scheme. Rather, it provides a common reference point against which the lifecycle emissions associated with the Scheme can be considered, without making the assessment dependent upon a particular long-term projection of the future electricity generation mix. The two approaches therefore address the comparison on different bases. The UoD calculation illustrates the outcome under the DESNZ projected grid decarbonisation pathway, whereas the Applicant's assessment provides a comparison against the projected grid at the point at which the Scheme becomes operational. The Applicant acknowledges the results of the alternative calculation but does not consider that they invalidate the approach adopted within the ES or alter

Section No	Summary of applicant Response (as given in REPs 5-108)	Comments from UoD in reply	Applicant's Response
			the quantified lifecycle GHG emissions associated with the Scheme. The comparison with CCGT as baseline has been responded to within 5.1.1 in **Climate Change Response to Stop Lime Down Appendix D: University of Derby's response to [REP3-132] [REP5-108]**. In summary when compared with a CCGT baseline, Lime Down has a payback year of less than 3 years of operation for both fixed and tracked panels.
Scenario testing			
8.1	The Applicant has updated their emissions figures in the updated ES [**REP5-023**]	Noted. UoD has accepted the updated emissions verbatim in their assessment of net savings (Section 3.0 of this report).	The Applicant notes this comment.

Table 3-13 Stop Lime Down – Appendix B: Climate Response – UoD Comments on Updated ES [REP5-023] [REP6-081]

Section No	Summary of applicant Response (as given in REP5-023)	Comments from UoD in reply	Applicant's Response
7.1.1 to 7.10.14	Panel layouts and the associated energy output – this includes updated commentary on UoD's enquiry over the apparent reversal of fixed and tracker panel energy outputs and it is explained that more fixed panels can be fitted into the allocated space than tracker panels, hence the yield is higher.	The comments have been noted.	The Applicant notes this comment.
7.10.3 to 7.10.82	**GHG emissions:** construction and operational emissions are updated significantly throughout the ES including Well-to-tank related emissions, the use of EPDs for panel emissions, mounting structures, electrical cables, BESS, shipping of materials, vehicle movements, waste, water usage and energy usage. Updated operational emissions include maintenance	UoD have accepted these verbatim in their calculation of energy output/avoided emissions and net savings (in section 3 of this report) as there has not been sufficient time to investigate individual emissions further before Deadline 6. In any case, the emissions presented by the Applicant in the updated ES are less lenient than those presented by UoD in **[REP1-182]**.	The Applicant notes this comment.

Section No	Summary of applicant Response (as given in REP5-023)	Comments from UoD in reply	Applicant's Response
	travel, replacement of Scheme components (BESS and panels), water consumption.		
7.7.5, 7.10.6, 7.10.8 Also 7.10.88	**Response to UoDs previous comments comparing Scheme vs. Grid performance using decarbonised Grid (as per DESNZ, 2023):** • Recognises UK grid carbon intensity projected to decrease as additional low-carbon generation deployed. However, the purpose of the assessment is not to demonstrate that the Scheme will maintain lower carbon intensity than an evolving national grid throughout operational lifetime, rather, the assessment considers lifecycle GHGs associated with the Scheme and the contribution it makes through meeting national decarbonisation • Stresses comparison of	Whilst the UoD takes on a lot of these points, the UoD still have issues with the comparison of the Scheme with the first year of operation (2029) and how Net Savings are ultimately calculated. These have been detailed in a separate Section 3.0 as it warrants a separate discussion. If the Scheme is delayed for whatever reason, the comparative Grid intensity could dictate that the Scheme may slip into a deficit re: carbon emissions.	The Applicant notes this comment. Please see response to comment 5.1.1 - 5.2.5 in **Table 3-12** above.

Section No	Summary of applicant Response (as given in REP5-023)	Comments from UoD in reply	Applicant's Response
	Scheme's lifetime GHG intensity to projected Nat Grid intensity for 2029 (first year of operation to provide context regarding carbon performance of Scheme at point of electricity generation)		
7.10.73	Accounting for the estimated construction phase and operation phase emissions, the Scheme's total carbon intensity value is 46.29 gCO2e/kWh for tracker panels and 40.52 gCO2e/kWh for fixed panels.	Possible correction: these values (46.29 and 40.52 gCO2e/kW are lifetime values (construction plus operational values would be 40.08 and 45.35 gCO2e/kWh and 40.08 for trackers and fixed respectively	The Applicant acknowledges that the carbon intensity cited as construction and operational for fixed and tracker panels (40.52 and 46.29 gCO2e/kWh) also accounts for the carbon emissions due to the decommissioning of the Scheme. Without decommissioning, the carbon intensity would be 45.74 gCO2e/kWh for tracked and 40.09 gCO2e/kWh for fixed. Decommissioning accounts for ~1% of the total carbon emissions of the Scheme. The updated figures do not change the conclusions of the assessment.

Section No	Summary of applicant Response (as given in REP5-023)	Comments from UoD in reply	Applicant's Response
7.10.88 - 7.10.95	Overall GHG Significance Effect: • The future baseline scenario, i.e. a scenario without the Scheme, is based on forecast UK grid average energy emissions from DESNZ for year 2029 (i.e. **48.9 gCO2e.kWh**). The operational energy intensity allows isolated comparison of the emissions associated with operation of the Scheme compared to the alternative in the year that electricity generation from the Scheme commences. Once in the operation/maintenance phase, the Scheme will achieve emissions reductions compared to a without-Scheme baseline. • The operational intensity of Scheme is projected to be **27.74 and 32.55 gCO2e/kWh** for fixed and tracker respectively. Comparative grid intensity is **48.9**	Net savings: These savings are achieved through the comparison of the Scheme's avoided emissions with incurred emissions, using the grid intensity value of 48.9 gCO2e, as the comparator in the first year of the Scheme's operation 2029 (DESNZ, 2023). There is extensive commentary throughout the updated ED to make this clear. Whilst UoD accept it is a reasonable strategy, we comment that if a lower comparator is used i.e. somewhere between 45 and 48.9 gCO2e/kWh, the Scheme could slip back into an emissions deficit – see Section 3.0 7.10.92 Table 7-28: These are Operational Intensities and should they read 40.52 and 46.29 gCO2e instead (lifetime GHG)?	The Applicant notes this comment. Please see response to comment to 5.1.1-5.2.5 in **Table 3-12.** The Applicant notes this comment. Please see response to comment to 7.10.73 above.

Section No	Summary of applicant Response (as given in REP5-023)	Comments from UoD in reply	Applicant's Response
	gCO2e/kWh. The Scheme will contribute to reducing average emissions from grid and the GHG emissions during construction/operation and decommissioning can be considered to be offset by the net positive impact of the Scheme on the UK's ability to meet its carbon targets • Table 7-28 (7.10.90) presents Lifetime GHG emissions from different technologies. The last entries incorporate the Scheme's updated intensity values, **27.72 and 52.55 gCO2e** (fixed and tracker respectively) • 7.10.92 presents the Net Savings as **266,507 and 65,916 tCO2e** (fixed and tracker respectively)		
7.12.57.12.8	**Residual effects and conclusions:**	UOD take all these points as very valid and well-expressed. The UoD's only proviso is that if you use	The Applicant notes this comment. Please see response to comment to 5.1.1-5.2.5 in **Table 3-12** above.

Section No	Summary of applicant Response (as given in REP5-023)	Comments from UoD in reply	Applicant's Response
	These sections represent new text that reiterate the Applicant's position on the Scheme's benefits. They comment that: • The Scheme does not directly remove GHGs from the atmosphere. Its climate benefit arises from generating electricity from a low-carbon source, thereby displacing electricity that would be supplied by the projected UK electricity grid. Therefore, it is appropriate to compare the lifecycle emissions of the Scheme with a scenario in which Scheme is not developed and where equivalent quantity of electricity is supplied by projected UK grid carbon intensity at time of first generation. • Compared with the projected grid in the no project scenario, the Scheme is estimated to deliver a	anything other than the first year of operation (2029) value for grid GHG intensity, Scheme slips into carbon deficit – see section 3. There is an argument that some of the grid balancing mentioned is necessary because of the increasing reliance on solar, so this probably cannot be entirely claimed as a benefit. In order to contribute to Net Zero by 2050, the Scheme will have to payback before 2050.	The Scheme is designed to support the trajectory towards the UK's statutory commitment to achieve net zero GHG emissions by 2050.

Section No	Summary of applicant Response (as given in REP5-023)	Comments from UoD in reply	Applicant's Response
	net savings of **266,507 tCO2e** over the assessment period. It should be recognised that this comparison is based on different accounting boundaries. Projected UK grid carbon intensity reflects territorial emissions associated with electricity generation, whereas Scheme lifecycle assessment includes global emissions associated with manufacture, transport, construction, operation and decommissioning of the Scheme. A substantial proportion of the Scheme's embodied carbon, including manufacture of PV modules and associated overseas transport, occurs outside UK and would not be included in within UK territorial emissions. Consequently, the comparison is conservative because the Scheme is assessed using a global lifecycle boundary, whereas projected UK grid carbon		

Section No	Summary of applicant Response (as given in REP5-023)	Comments from UoD in reply	Applicant's Response
	intensity reflects only territorial emissions. • The calculated net savings does not capture wider benefits of the Scheme. In particular, inclusion of BESS supports grid balancing and can reduce reliance on higher carbon intensity electricity generation. Increasing supply of low carbon electricity is vital for decarbonisation of other sectors including heating and transport, where electrification is expected to play key role in achieving economy wide emissions reductions. • As set out 7.1 Statement of Need **[REP1-085]**, the Scheme is designed to contribute towards the UK's statutory commitment to achieve net zero GHG emissions by 2050, the role of the Scheme extends beyond decarbonising the		

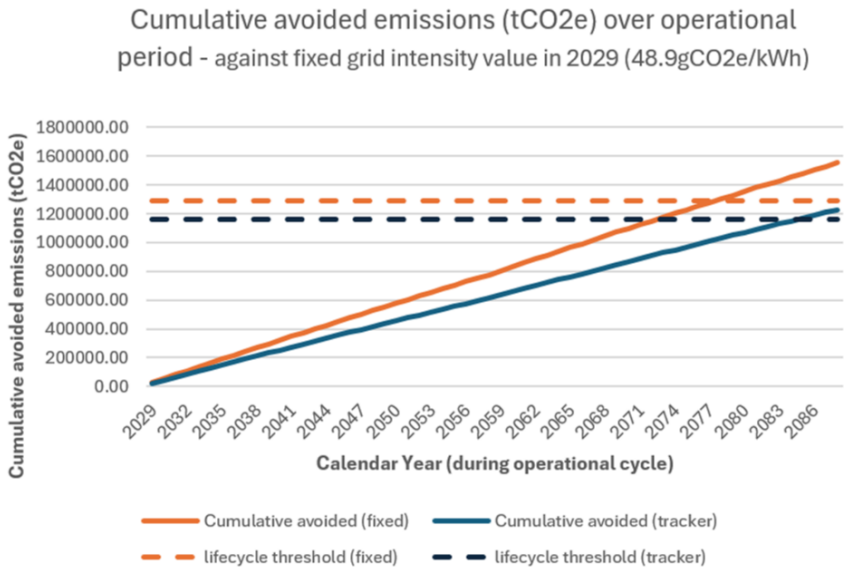
Section No	Summary of applicant Response (as given in REP5-023)	Comments from UoD in reply	Applicant's Response
	electricity sector; a secure and abundant supply of low carbon electricity is essential to enable wider transition away from fossil fuels across the economy, supporting emissions reductions in sectors that cannot be decarbonised through changes to electricity generation alone.		

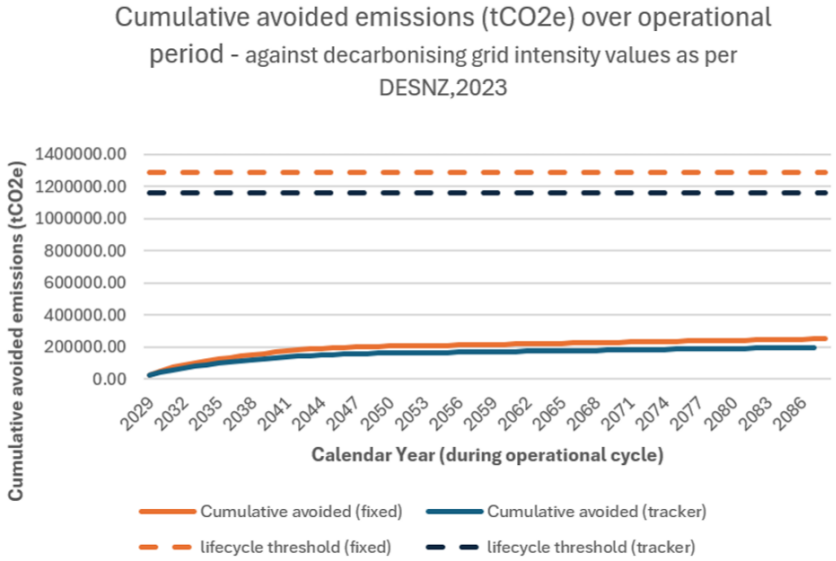
Table 3-14 Stop Lime Down – Appendix B: Climate Response – Comment on the Applicant's Assessment of Net Savings and Its Effect on Payback [REP6-081]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-286	Climate Change and Energy Need	Grid Carbon Intensity	The updated ES **[REP5-023]** has been extensively reworded to reflect the Applicant's position regarding the comparison of the Scheme against the Grid carbon intensity within the first year of operation (2029). Their main point is that by using the UK Grid Intensity of **48.9 gCO2e/kWh** as a comparison, the Scheme does indeed make Net savings of **266,507 tCO2e** for fixed panels and **65,916 tCO2e** for the tracker panels.	The Applicant notes this comment. Please see response to comment to 5.1.1-5.2.5 in **Table 3-12.**
SLD-287	Climate Change and Energy Need	Grid Carbon Intensity	In the updated ES (§7.12.6), the Applicant stresses that UK Grid carbon reflects territorial emissions associated with electricity generation, whereas the Scheme's lifecycle assessment includes global	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			emissions associated with manufacture, transport, construction, operation and decommissioning of the Scheme.	
SLD-288	Climate Change and Energy Need	Grid Carbon Intensity	Whilst UoD take on the point that the UK Grid will decarbonise because of Schemes like this, perhaps there is a fairer approach. The Applicant's use of **48.9gCO2e/kWh** certainly produces a Net Saving of about **266,507 and 65,916 tCO2e** for fixed and tracker panels respectively, whilst UoD's approach of comparing the Scheme against a decarbonising Grid (using DESNZ, 2023) shows a deficit using the updated energy output and GHG emissions values presented in the ES [**REP5-023**], This is demonstrated in the Appendix, with an	The Applicant notes this comment. Please see response to comment to 5.1.1-5.2.5 in **Table 3-12.**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			explanation of the terms and how the spreadsheets are worked out.	
SLD-289	Climate Change and Energy Need	Emissions	Figures 3.1 and 3.2 show the two contrasting approaches. Cumulative avoided emissions (i.e. those which would be produced by the grid for the same electricity generation of the Scheme) are compared with the incurred emissions of the Scheme (the two different thresholds represent the two panel scenarios: fixed and tracker). In the Applicant's approach (Fig 3.1) payback occurs along with the quoted net savings. The cumulative avoided emissions crosses the Applicant's given lifetime GHG emissions threshold of **1,286,483 and 1,160,670 tCO2e** for fixed and trackers respectively. On the other hand,	The Applicant acknowledges these figures.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			in the UoD's approach (Fig 3.2), payback does not occur.	
SLD-290	 Fig.3.1 Cumulative avoided emissions during operational cycle for fixed value of 48.9gCO2e/kWh (Grid intensity in 2029)	The Applicant acknowledges this figure.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-291	 Fig.3.2 Cumulative avoided emissions during operational cycle for decarbonising grid (UoD approach)			The Applicant acknowledges this figure.
SLD-292	Climate Change and Energy Need	Grid Carbon Intensity	Evidently, these almost represent two extremes, and it is likely the true answer lies somewhere between. Using the same rationale in the Appendix spreadsheet, it is possible to	The Applicant notes this comment.

<table>
<tr><th>Reference</th><th>Theme</th><th>Issue</th><th>Comments/Issues Raised</th><th>Applicant's Response</th></tr>
<tr><td></td><td></td><td></td><td>calculate the net savings using comparisons made using different Grid intensities to demonstrate this point (3.1)</td><td></td></tr>
<tr><td>SLD-293</td><td colspan="3">Table 3.1 Net Savings associated with various Grid Intensities

<table><tr><th rowspan="2">Grid Intensity used in comparison (gCO2e/kWh)</th><th colspan="2">Net Savings (tCO2e)</th></tr><tr><th>Fixed</th><th>Tracker</th></tr><tr><td>48.9</td><td>266,593</td><td>65,983</td></tr><tr><td>45</td><td>142,182</td><td>-32,279</td></tr><tr><td>43</td><td>78,686</td><td>-82,430</td></tr><tr><td>40</td><td>-16,558</td><td>-157,656</td></tr></table></td><td>The Applicant acknowledges this table.</td></tr>
<tr><td>SLD-294</td><td>Climate Change and Energy Need</td><td>Grid Carbon Intensity</td><td>Effectively, a comparison made with the grid intensity, somewhere between 45 and 48.9 gCO2e/kWh i.e. later than 2029, the net savings will become negative i.e. a net emitter for trackers and at somewhere between 40 and 43 gCO2e/kWh likewise for fixed panels. This indicates that it is very sensitive to the grid intensity.</td><td>The Applicant notes this comment.</td></tr>
</table>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-295	Climate Change and Energy Need	Grid Carbon Intensity	***Applicant's Note**: The Applicant notes that Stop Lime Down's submission includes an additional appendix comprising a spreadsheet comparing lifetime energy generation, avoided emissions and net greenhouse gas emissions savings under different assumptions for UK Grid carbon intensity.* *For conciseness, the Applicant has not reproduced the detailed spreadsheet calculations within the table below.*	The Applicant notes the spreadsheet submitted alongside of SLDs Appendix B of the Deadline 6 submission. The Applicant has reviewed the data, however, maintains its position as set out in previous submissions and presented above in 5.1.1-5.2.5 in **Table 3-12.**

Table 3-15 Stop Lime Down – Appendix Z: Combined Baseline and Project Information Plan [AS-019]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-296	Scheme Description and DCO Process	General Remarks	***Applicant note**: Appendix Z comprises an updated version of Stop Lime Down's Combined Baseline and Project Information Plan.*	The substantive matters to which this plan relates are addressed in the Applicant's responses to Stop Lime Down's Deadline 6 submissions at Table 3-9.

Table 3-16 Stop Lime Down – Updated Appendix Z: Combined Baseline and Project Information Plan [REP6-082]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-297	Scheme Description and DCO Process	General Remarks	***Applicant note**: the updated Appendix Z comprises an updated version of Stop Lime Down's Combined Baseline and Project Information Plan.*	The substantive matters to which this plan relates are addressed in the Applicant's responses to Stop Lime Down's Deadline 6 submissions at Table 3-9.

4 The Applicant's Response to Host and Neighbouring Parish Councils

4.1 Sherston Parish Council

Table 4-1 Sherston Parish Council – Additional Submission

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SPC-001	Transport and Access	HGV routes	Sherston Parish Council has been consulted on the Wiltshire Council Freight Action Plan, which is also open to the general public. Please see below a link to the consultation and also a copy of appendix A which illustrates the proposed HGV routes. Sherston PC asks the Examining Authority to include this email and Appendix A in the examination library. It is clear from the plan that there are NO HGV routes serving the proposed Lime Down project area. This omission underlines that the rural road network surrounding Sherston and other affected villages such as Grittleton, Foxley, Rodbourne and Norton is totally unsuited	The Parish Council's comment is noted. However, the Applicant does not accept that the absence of an advisory freight route through the Lime Down project area in Wiltshire Council's Freight Action Plan Appendix A demonstrates that the local highway network is unsuitable for the temporary construction HGV movements associated with the Proposed Development. The Wiltshire Freight Action Plan is a strategic countywide document. It is intended to guide the management of freight movement across Wiltshire in a way that supports sustainable economic growth.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			to the applicant's plans and the huge increase in volume and size of hgv traffic. *Applicant's Note: The submission includes a map titled Wiltshire HGV Route Network, linked here.*	Appendix A identifies the proposed advisory freight network. It is not a site-specific construction traffic routing assessment and does not identify every road that may appropriately be used by HGVs for local access, deliveries, agriculture, utilities or temporary construction activity. The fact that a road is not shown as part of the advisory freight network does not infer that HGV's on other routes are unsafe or unsuitable. The proposed Lime Down HGV routes would be controlled through the Construction Traffic Management Plan. The CTMP is the appropriate mechanism to secure construction-phase controls, including prescribed routing, delivery management, driver information and briefings, signage where required, booking or scheduling arrangements, monitoring, and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				measures to avoid unnecessary HGV routing through sensitive settlements where practicable. These controls are materially different from unmanaged through-freight movements, which are the principal focus of the countywide advisory freight network.

5 The Applicant's Response to Parties Mentioned in the Book of Reference

5.1 Jonathan Tippet Seymour-Williams

Table 5-1 Jonathan Tippet Seymour-Williams – Farleaze Farm, Pig Lane and the Personal Impact of Lime Down [REP6-087]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JSW-001	Scheme Description and DCO Process	Introduction	My name is Jonathan Seymour-Williams. I live at [READCTED] Farleaze is a listed farmhouse with listed buildings within its curtilage. It has been my home, my principal asset and centre of business for 30 years, and is now the centre of my retirement planning. This statement concerns the specific effect of Lime Down on Farleaze and on me personally. Farleaze lies at the centre of a special landscape. It is not simply a house within some field. It sits within a distinctive rural and equestrian setting, close to Badminton, adjoining the Fosse Way, and within a landscape whose value lies in its openness, history, tranquillity, farming pattern, routes, drainage and sporting character. insert photo The holding lies in an area of about 70 acres within the wider triangle	The Applicant notes this comment. Responses to specific points raised are provided in JSW-002-003 below.

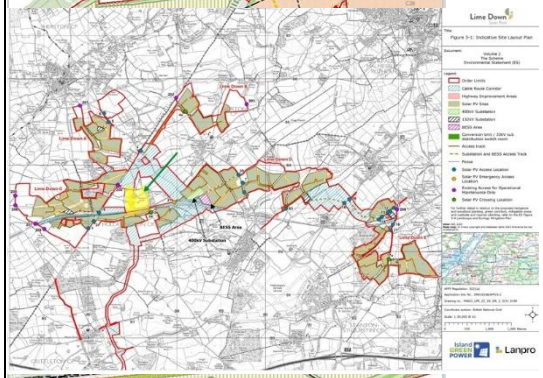
Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			formed by the Fosse Way, the railway and Piglane. That area is clearly visible on the Lime Down plans. It is a natural meeting point of landscape, transport, drainage and land-use issues. It is therefore not peripheral to the scheme. It is one of the places where the practical consequences of the scheme are most sharply felt.	
JSW-002	Socio-Economics, Tourism and Recreation	Personal Impact	Before Lime Down arrived in March 2024, my farming assistant and I were working on a plan to reposition Farleaze for the next stage of my life. My [REDACTED] was about to be married from home and we were actively planning continuity of a wedding venue specific to a lighter weight Cotswold farmhouse and the three churches, Foxley, Alderton and Norton associated with this area. The plan was to move away from intensive farming and towards lower-impact rural, heritage, equestrian, recreational and retreat uses. That was the logical future for a listed farm in this setting. It would also	The Applicant has sought to ensure that all information with respect to potential impacts from the Scheme has been clearly set out to Interested Parties. The Applicant acknowledges that the DCO consenting scheme means that not all details are fixed at the point of a decision being made. However, all parameters, and thus the worst case level of impact to receptors are fixed, and assessed through the Environmental Statement.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			have allowed me to reinvest capital, create a sustainable role for the next generation of management, and plan sensibly for retirement and inheritance. Lime Down has stopped that plan. The difficulty is not only whether the scheme is ultimately approved. The difficulty is the uncertainty created now. I cannot sell Farleaze with confidence. I cannot invest in it with confidence. I cannot commit funding to the listed buildings, drainage, woodland, screening, access or alternative rural uses while the future of the surrounding landscape remains unresolved. At my stage of life, that uncertainty has a particular impact. Retirement planning requires certainty. A person cannot wait indefinitely while a principal asset is placed under the shadow of a major infrastructure scheme. I need to know now whether Farleaze is affected, not after the Examination, not after detailed design, and not after other	The Applicant has furthermore aimed to ensure that communication between the Applicant team and Interested Persons was established through non-statutory and statutory consultation prior to the DCO application being made. The Applicant has furthermore committed to ongoing community and stakeholder communications ahead of construction being undertaken to ensure that stakeholders can have greater clarity in upcoming effects. These are secured through the Community Liaison Group by Requirement 4, and Stakeholder Communication Plan via the **Outline Construction Environmental Management Plan [REP6-029]** by Requirement 13 of Schedule 12 to the **Draft DCO [REP6-005]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			landowners have arranged their own outcomes.	
JSW-003	Socio-Economics, Tourism and Recreation	Personal Impact	There is also an unfair divergence between landowners. Some neighbouring landowners may be able to use their fields for solar or associated agreements and may be compensated or otherwise accommodated. Other farming families and tenant farmers have had to reorganise their lives around the scheme, and in some cases their position has been addressed. I have not had that clarity. I remain in the middle, affected by the consequences of plans made around me, without knowing whether Farleaze is to be protected, compensated, bypassed or blighted. That has a real economic cost. A listed house and farm cannot be separated from its setting. If that setting is industrialised, disrupted or left uncertain, the value and future use of the property are affected. The loss is not only physical occupation of land. It is loss of confidence, loss of opportunity, loss of	The Applicant understands that the land owned by Mr. Seymour-Williams is encircled by the Order Limits, however no part of the Order Limits is known to be within a title under Mr. Seymour-Williams' ownership or interest. As such, the Applicant has not been engaged in direct negotiations as the Scheme will not directly affect their land, hence why no compensation, voluntary or otherwise has been discussed. The Applicant has however sought to ensure any representations made by the owners of Farleaze Farm have been duly responded to throughout the examination process, to ensure that Mr Seymour-Williams has had clarity on any outstanding concerns raised.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			marketability and loss of the ability to plan. This has a personal cost. Since March 2024 I have had to live with the possibility that the retirement plan I had formed for Farleaze may no longer be possible. My two children have been adversely impacted and their interest in the future frustrated. That affects resources, judgement, health and mental wellbeing. It is not reasonable to treat that as a minor or temporary inconvenience. For someone at [REDACTED] , two years of uncertainty is itself a serious burden. Farleaze should therefore be considered specifically. It is a listed home, a farm, a retirement asset, and a central holding within a sensitive rural and equestrian landscape. It should not be treated as an incidental neighbour or an edge case.	The Applicant has sought to ensure any environmental effects from the Scheme that may impact upon Farleaze Farm have been given due consideration in the assessment within the Environmental Statement given it is an immediate neighbour of the Scheme. This includes, but is not limited to: • **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**; • **Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and supporting **Appendices 11-4 and 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C1** and **C2 [REP6-010]** and **[REP5-053]**; • **Chapter 12: Cultural Heritage [REP3-017]**; • **Chapter 14: Noise and Vibration [REP5-024]**; and • **Chapter 15: Air Quality [REP2-008].**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Mitigation measures most pertinent to Farleaze Farm are secured through the **Outline LEMP [REP6-037], Outline CEMP [REP6-029]**, **Outline OEMP [REP6-031]**, and **Outline CTMP [REP6-041]**, by Requirements 7, 13, 14, and 15 respectively in Schedule 2 to the **Draft DCO [REP6-005]**.
JSW-004	Site Selection and Alternatives	Farleaze and Pig Lane	My request is simple. If Farleaze and Pig lane are not to be affected by Lime Down, that should be stated clearly and secured now. If Farleaze or Pig lane may be affected, that should also be stated clearly now, and the impact on the listed building, its setting, drainage, access, future use, marketability, retirement planning and mental health should be assessed properly before any powers are granted. The arrival of Lime Down in March 2024 has already destroyed the certainty on which my plan for Farleaze depended. That loss should be recognised as part of the real human and economic cost of the scheme.	The hydrology and drainage matters raised in relation to Farleaze Farm and Pig Lane have been specifically addressed in FHW2.11 of the **Applicant's Response to the ExA's Second Written Questions [REP5-097]**, pp. 217-220. That assessment considered the local topography, mapped flood risk, railway drainage infrastructure, Solar PV Panelled Areas and cable works around Farleaze Farm. It concluded that the Scheme will not increase or redirect surface water runoff towards Farleaze Farm or the railway drainage system

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			   	and that no additional Scheme-specific flood mitigation is required. The Scheme-wide runoff-management approach has also been agreed with Wiltshire Council as Lead Local Flood Authority, as recorded in the **Statement of Common Ground with Wiltshire Council [REP6-045]**, item 3.7.4. **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**, supported by appendices in **ES Volume 3 (12-1 to 12-7) [APP-219 to APP-232]** has assessed the potential impact of the Scheme on heritage assets. No harm was identified to the Grade II Listed Farleaze Farmhouse as a result of the Scheme. The Scheme has an associated suite of mitigation measures in place to reduce impacts on the surrounding environment and neighbouring properties such as

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Farleaze Farm, as has been set out in 'JSW-003' above. This includes screening and planting measures to mitigate visual and setting impacts, and transport control measures to ensure access is maintained. Impacts on the value or saleability of properties were not assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This is because this falls outside the scope of assessment as agreed in the **Scoping Opinion adopted by the Secretary of State on 22 August 2024**. Impacts on mental health have been undertaken at a population scale with vulnerable sub-populations identified in **ES Chapter 18: Human Health [APP-070]**, rather than assessing likely effects to individuals which would be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				disproportionate for this type of development.

Table Error! No text of specified style in document.**-2 Jonathan Seymour-Williams – Additional Submission**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JSW2-001	Hydrology, Flood Risk and Drainage	General Remarks	Farleaze Farm Flooding, Railway Drainage and Fosse Way Runoff My name is Jonathan Seymour-Williams. I am the owner of Farleaze Farm, Pig Lane. I attended Tuesday's hearing but had to leave before the discussion concerning the flood plain at Farleaze Farm. I have since reviewed the transcript and wish to make this short written submission.	The Applicant has reviewed the further submission from Mr Seymour-Williams. The concerns raised relate to existing flooding in the vicinity of Farleaze Farm, the railway drainage system and whether the Scheme could worsen that position. The submission also asks seven specific questions and requests a separate Farleaze drainage note. The Applicant does not propose to prepare a separate Farleaze drainage note or addendum. The matters raised are addressed specifically in responses **JSW2-002 to JSW2-009** below, drawing on the existing assessment contained in the **Flood Risk Assessment and Drainage Strategy – Lime Down C2 [REP5-032]**, the **Flood Risk Assessment and Drainage Strategy – Cable Route Corridor [REP3-063]**, the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Applicant's response to FHW2.11 and the discussion at ISH5. Farleaze Farm lies outside the Scheme Order Limits. The Applicant has reviewed the local topography, mapped flood extents, surface water flow paths and drainage features in the surrounding area. That information identifies an existing low-lying area in the vicinity of Farleaze Farm and the railway embankment, associated with the existing railway culvert and drainage system. The Applicant has not assumed that the culvert inlet itself lies within the Farleaze Farm property. The relevant question for the Scheme is whether its construction or operation could materially increase, accelerate or redirect runoff towards that existing low point or the railway drainage system. The Applicant's assessment concludes that it

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				would not. The basis for that conclusion is set out in the responses below.
JSW2-002	Hydrology, Flood Risk and Drainage	Interaction of Systems	Farleaze Farm is not affected by one drainage issue in isolation. It lies at the practical meeting point of three contributing systems: the railway drainage, the Fosse Way scarp and watershed, and runoff from the surrounding fields into the lower-lying flood plain around Farleaze Farmhouse. The Applicant accepted at the hearing that the existing flood mapping corresponds with a local low flood point at Farleaze and that the Environment Agency mapping closely reflects the flooding experienced on the ground. The Applicant also described this as an existing drainage and conveyance issue involving local culverts and railway infrastructure. That is precisely why the position requires a joined-up and up-to-date assessment. The railway infrastructure runs broadly east-west, while the relevant culvert	The Applicant agrees that the drainage around Farleaze needs to be considered in the context of the interacting topography, field drainage, surface water flow paths and railway drainage system. The local topography, mapped flood extents, surface water flow paths and drainage features have been reviewed through the **Flood Risk Assessment and Drainage Strategy – Lime Down C2 [REP5-032]** and the **Flood Risk Assessment and Drainage Strategy – Cable Route Corridor [REP3-063]**. The assessment identifies the existing low-lying area in the vicinity of Farleaze and its relationship with the railway culvert. It has also considered the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			conveys water across that system. The Fosse Way occupies the higher scarp and watershed. Water falling from this higher ground drains back towards Farleaze, with flows then dividing broadly north-east towards the Norton Brook system and south-east towards the railway and Gauze Brook catchment. Farleaze therefore sits at the receiving point of natural topography, road drainage, field runoff and railway drainage. These systems interact. They cannot sensibly be assessed separately.	direction of runoff from the surrounding land and whether the Scheme could materially increase, accelerate or redirect flows towards that location. The surrounding Solar PV Panelled Areas would remain predominantly permeable and vegetated, with existing ground levels and field-scale drainage pathways retained. The panels do not create a connected impermeable drainage catchment and rainfall continues to discharge to the ground beneath and between the panels. The factors which could potentially alter runoff behaviour if not properly managed are principally changes in soil condition or compaction, inadequate vegetation establishment, erosion and the creation of preferential flow paths. These are specifically controlled through the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction and operational management measures so that the hydrological function of the land is maintained. This does not mean that the Applicant is predicting a material change in runoff from the panelled areas. The permanent cable infrastructure is predominantly below ground and areas disturbed during installation would be reinstated following construction. Where positively drained impermeable infrastructure is proposed, runoff is managed through the drainage measures set out in the relevant Drainage Strategies. On that basis, the Applicant has considered the interaction between field runoff, local drainage and the railway drainage system, together with the potential changes that could arise from

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the Scheme. No material increase, acceleration or redirection of runoff towards Farleaze Farm or the railway has been identified.
JSW2-003	Hydrology, Flood Risk and Drainage	Scheme Effects on Runoff	My concern with the Applicant's response at the hearing is that the railway drainage issue appears to have been treated principally as a pre-existing problem and therefore as something outside the effects of Lime Down. That does not answer the relevant question. The question is whether Lime Down, acting across a substantial upstream area, could alter the volume, rate, timing or concentration of water arriving at an already constrained low point and ultimately at the railway drainage system. If the existing culvert and railway infrastructure are already the controlling mechanism for flooding at Farleaze, that makes it more important—not less important—to understand what happens if	In response to the queries raised in JSW2-003: **What hydrological assessment has been undertaken for the Farleaze low point and flood plain?** Please refer to response provided in JSW2-002. **Has the combined behaviour of runoff from the Fosse Way scarp, surrounding fields, proposed Lime Down areas and railway drainage been modelled as one system?** No. The Applicant does not consider a combined hydraulic model of the Fosse Way, surrounding fields, railway drainage, Norton Brook and Gauze Brook to be necessary.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the hydrological behaviour of the upstream land changes. Additional or accelerated runoff from panel areas, tracks, construction compounds, cable works, temporary soil disturbance or new drainage arrangements could interact with an existing constraint. A pre-existing drainage problem does not remove the potential effect of the Scheme; it makes Farleaze a particularly sensitive receptor. The Applicant stated at the hearing that runoff would not increase because the solar fields would remain predominantly permeable and vegetated, existing levels and drainage pathways would be retained, and buried cable areas would be reinstated after construction. I ask that this conclusion be demonstrated specifically for the Farleaze catchment and flood plain rather than asserted at scheme-wide level.	Such a model would require detailed investigation of the existing railway drainage system and the causes of the existing flooding at Farleaze Farm. The Scheme does not alter or replace that railway drainage system. The potential changes introduced by Lime Down have been assessed. For the panelled areas, runoff response is controlled principally by soil condition, compaction, vegetation cover, erosion and the development of preferential flow paths. These are managed through the secured environmental management plans. The cable route is temporary construction disturbance followed by reinstatement.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• What hydrological assessment has been undertaken for the Farleaze low point and flood plain? • Has the combined behaviour of runoff from the Fosse Way scarp, surrounding fields, proposed Lime Down areas and railway drainage been modelled as one system? • What allowance has been made for the possibility that the volume, speed or timing of runoff arriving at the railway may change during construction and operation of Lime Down?	No material increase or redirection of runoff towards Farleaze Farm or the railway has been identified. **What allowance has been made for the possibility that the volume, speed or timing of runoff arriving at the railway may change during construction and operation of Lime Down?** Please refer to response provided below in JSW2-006.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JSW2-004	Hydrology, Flood Risk and Drainage	Network Rail Drainage	Of particular concern is the relationship with Network Rail. The hearing was told that the Applicant has engaged with Network Rail concerning the wider Scheme, interfaces and protective provisions, and that the works currently being undertaken by Network Rail are understood to concern piling and strengthening of the embankment rather than drainage. That is only part of the issue. The important question is not simply whether the current Network Rail works are labelled as "drainage works". It is whether the Applicant has a current and sufficiently detailed understanding of: the railway drainage system affecting Farleaze; the relevant culverts, inlets and outlets and their capacities; how those assets are presently maintained and managed;	The Applicant has contacted Network Rail regarding the ongoing works in the vicinity of Farleaze and has asked for confirmation of their scope and whether they include any works which could affect the flood risk and drainage assessment. The Applicant currently understands the works to relate to reinforcement of the railway embankment, including piling. Further information has been requested and Network Rail was contacted again following the September hearings, most recently on 21 September 2026. Network Rail has not provided the Applicant with detailed information on the capacity, condition, inlet and outlet arrangements or maintenance regime of the culvert and associated drainage assets at Farleaze.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			how Network Rail's present and future asset-management proposals may affect water movement; the interaction between those arrangements and runoff from the Fosse Way and surrounding land; and how Lime Down's proposed drainage and construction arrangements interact with that complete system. The Applicant should therefore make clear to the Examining Authority that its hydrological assessment is up to date and based upon the actual present-day operation and management of the railway drainage system, rather than assumptions derived from mapping or historic conditions. If Network Rail controls an important part of the drainage mechanism at Farleaze, the Applicant cannot properly demonstrate that Lime Down will have no adverse effect without understanding what	The Applicant has also not been provided with information identifying any future Network Rail drainage or asset-management works which would materially change the existing drainage arrangement. The assessment has therefore not relied on any particular capacity or standard of performance of those assets, or assumed that current or future Network Rail works would improve the existing drainage arrangement. The railway drainage and culvert have been treated as part of the existing downstream drainage system. The mapped flooding and local low point around the railway culvert have been taken into account in assessing the potential effect of the Scheme. As set out in the responses to JSW2-002 and JSW2-003, the assessment has considered runoff from the surrounding land and whether the Scheme could increase,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Network Rail is doing, what it proposes to do, and how the two systems interact. What current information has been obtained from Network Rail concerning the culverts, drainage assets, capacities, maintenance and management arrangements affecting Farleaze?	accelerate or redirect flows towards Farleaze and the railway. During construction, the potential for temporary changes in runoff from soil disturbance, compaction, excavations, stockpiles and temporary drainage is controlled through the secured construction and soil management measures. During operation, existing ground levels and field-scale drainage pathways are retained across the Solar PV Panelled Areas, with the land remaining predominantly permeable and vegetated. The Scheme does not alter the railway culvert or depend on any improvement to its capacity or maintenance. The conclusion that the Scheme would not increase flood risk at Farleaze therefore does not rely on Network Rail undertaking drainage works or changing its

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				management of the existing railway drainage system. The Applicant is continuing to seek clarity from Network Rail. At the point of submissions for Deadline 7, no further information has been provided.
JSW2-005	Hydrology, Flood Risk and Drainage	Network Rail Drainage	4. Has the Applicant confirmed that its hydrological modelling reflects Network Rail's **current scheme of management and current works**, rather than relying upon earlier assumptions?	The Applicant has not assumed that the current Network Rail works improve, replace or otherwise change the existing railway drainage arrangement. The flood risk assessment is therefore not dependent on the precise capacity, maintenance regime or future management of the railway drainage system. The existing flooding at Farleaze and the management of the railway drainage infrastructure are matters

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				associated with existing Network Rail assets. The Applicant has assessed the potential impact of the Scheme . No material increase or redirection of runoff towards the railway has been identified.
JSW2-006	Hydrology, Flood Risk and Drainage	Lime Down D Runoff	5. What allowance has been made for the possibility that the volume, speed or timing of runoff arriving at the railway may change during construction and operation of Lime Down?	Construction is the period with the greatest potential for temporary changes from exposed ground, excavations, stockpiles, trafficking and soil compaction. These matters are controlled through the **Outline Construction Environmental Management Plan [REP6-029],** including the Water Management Plan, and the **Outline Soil Resources Management Plan [REP6-035].** The controls include temporary drainage, runoff and sediment management, soil protection, inspection and remediation. The purpose of these measures is to prevent construction activities from creating or diverting

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				additional flows towards Farleaze Farm or the railway culvert. During operation, the panelled land remains permeable and vegetated. Soil condition, vegetation establishment, erosion, channelisation and drainage pathways are monitored and managed through the relevant plans.
JSW2-007	Hydrology, Flood Risk and Drainage	Monitoring and Verification	6. How will the Applicant monitor and verify that Lime Down does not increase ponding, flood depth, flood duration or the frequency of flooding at Farleaze?	The Applicant does not consider routine monitoring of flood depth, duration, frequency or flow at Farleaze Farm to be appropriate. Flooding at Farleaze is affected by rainfall, the existing railway drainage system, highway drainage, runoff from land outside the Scheme and any separate Network Rail works. A change recorded at the property could not readily be attributed to Lime Down.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Monitoring is therefore focused on the mechanisms that the Scheme can affect and control. This includes soil condition and compaction, vegetation cover, erosion, rilling and channelisation, drainage pathways and the performance of formal drainage. Where a persistent problem is identified, the management plans provide for investigation and corrective action.
JSW2-008	Hydrology, Flood Risk and Drainage	Monitoring and Verification	7. Given that Farleaze is already an acknowledged low-lying receptor with known flooding, why should it not be specifically included within the hydrological monitoring and verification framework?	For the reasons above, the Applicant does not consider a permanent downstream monitoring location at Farleaze Farm to be justified. The hydrological management measures are directed at the source of any potential Scheme-related change. This allows issues such as compaction, poor vegetation establishment, erosion or altered drainage pathways to be identified and corrected directly.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				If monitoring within the Scheme identified a persistent hydrological issue with a reasonable potential to affect a downstream receptor, further targeted investigation could be undertaken. Routine monitoring at Farleaze in the absence of such an identified issue would not provide a reliable means of separating Scheme effects from the existing railway and wider catchment influences.
JSW2-009	Hydrology, Flood Risk and Drainage	Hydrological Baseline and Further Assessment	The Applicant's present position appears to be that Lime Down will not increase surface-water runoff and therefore will not worsen the flooding already experienced at Farleaze. That conclusion depends upon the accuracy of the hydrological baseline. The Examining Authority should therefore be satisfied that the Applicant understands the whole system as it operates **now**: the Fosse Way watershed, the Farleaze flood plain, the railway culverts and drainage, the Norton Brook and Gauze Brook catchments, and	The Applicant does not consider a separate Farleaze drainage note or addendum necessary. Farleaze has been considered specifically through the Applicant's response to FHW2.11, the relevant Flood Risk Assessments and Drainage Strategies, the discussion at ISH5 and the responses **JSW2-001 to JSW2-008** above. Those assessments identify the existing low-lying area and railway drainage constraint, consider the relevant contributing runoff pathways and assess whether the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Network Rail's current management of its infrastructure. I respectfully ask the Examining Authority to require the Applicant to confirm this expressly and, if necessary, provide a specific Farleaze drainage note or addendum demonstrating the interaction between: • the Fosse Way scarp and road drainage; • the surrounding field catchments; • the Farleaze flood plain; • the railway culverts and drainage infrastructure; • Network Rail's current drainage and asset-management arrangements; • the Norton Brook and Gauze Brook systems; • the proposed Lime Down development and construction works; and • the hydrological monitoring and verification framework.	construction or operation of the Scheme could materially increase, accelerate or redirect runoff towards Farleaze Farm or the railway. The Applicant has not sought to establish the detailed hydraulic capacity, condition or maintenance requirements of Network Rail's existing drainage infrastructure because the Scheme does not alter that infrastructure and the assessment does not rely upon it having any particular capacity or standard of performance. The railway drainage system and associated existing flooding have instead been treated as part of the existing downstream drainage environment against which the incremental effects of the Scheme have been assessed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			This needs to be established before consent, not left to subsequent management plans. Farleaze is already the low point at which these systems meet. Before the Scheme is permitted to introduce another major influence into that catchment, the Examining Authority should be satisfied that the Applicant understands the existing system in full and is working from current information supplied by Network Rail.	Detailed investigation of the capacity, condition or maintenance of Network Rail's drainage assets would therefore only be necessary if the assessment of the Scheme relied upon a change to, or particular performance of, those assets. It does not. The Scheme does not propose works to the railway culvert and does not rely upon Network Rail improving, modifying or maintaining that system to a different standard. The potential hydrological changes introduced by the Scheme are instead addressed at source. During construction, this includes controls on soil disturbance, compaction, temporary drainage, runoff, sediment and reinstatement through the relevant construction and soil management plans. During operation, existing ground levels and field-scale drainage pathways are retained across the Solar PV Panelled Areas, with soil condition, vegetation establishment,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				erosion, channelisation and drainage performance subject to monitoring and management. The Applicant therefore considers that the existing evidence provides a proportionate and sufficient basis to assess the potential effect of the Scheme at Farleaze Farm. No material increase or redirection of runoff towards Farleaze or the railway has been identified and the Applicant does not consider that further hydraulic modelling or a separate Farleaze drainage addendum is required.
JSW2-010	Hydrology, Flood Risk and Drainage	Supporting Information	***Applicant note**: Photographs were included in JSW's submission showing flooding in 2017 and the railway bank rebuild in 2026.*	The Applicant notes the supporting photographs.

5.2 John Baillie

Table 5-3 John Baillie – Additional Submission

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JB-001	Consultation and Engagement	Landowner engagement	After last CAH meeting I was caught on the way out by representatives of Dalcour Maclaren promising a meeting as soon as possible. However this did not happen for several weeks despite email contact where I outlined the points including ones I had made at CAH 1 and suggested these as a starting point for an agenda for the meeting. They produced a Heads of Terms document on the 11th of August. The meeting eventually took place on the 25th of August. At this meeting we discussed the many errors in the Heads of Terms Agreement and I presented what conditions I needed to be able to sign the agreement and I also handed over all my field drainage maps for their information.	The Applicant approached and spoke to the respondent immediately after CAH1. It was agreed that a meeting would be scheduled in due course. The Applicant contacted the respondent and their land agent on 2 July 2026. The meeting took place on 25 August 2026. Noting the respondent's comment, the Applicant would like to clarify the suggestion of errors. At the point of attending the meeting, the Heads of Terms were in an agreed format with the respondent's land agent. The purpose of the meeting was to discuss those terms as a collective and address any specific site requirements from the respondent. The Applicant is confident that the meeting proceeded as intended, and it is not its opinion that there were errors in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			I felt the meeting was constructive and Dalcour Maclaren stated they took my points on board and said they would discuss them with the developer and get back to my agent and myself by the end of the week (28th August). To date they have not responded to any of my discussion points from either Dalcour Maclaren or representatives of the developer.	the document, moreover, points of discussion to aid negotiations. The Applicant agrees that the meeting was constructive, with meaningful progress made. The Applicant notes a correction is required to the dates mentioned in the CAH2.The Applicant responded to the respondent's land agent on the 8 September 2026 with responses to queries raised in the meeting in relation to alternative wording within clauses in the Heads of Terms rather than the 27th August as mentioned at CAH2. . The proposed alternative wording was agreed between the Applicant and the respondent's land agent on 9 September 2026. The Applicant and the respondent's land agent had been approaching the Heads of Terms as a collective, with amendments being reflected across all of the land agent's clients. The Applicant subsequently

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				updated the Heads of Terms document and issued to the respondent's land agent on 9 September 2026 for review.
JB-002	Soils and Agriculture	Landowner Concerns	The points included in my email were 1) Drainage issues both on the line of the cable and in my field which drains via a solar farm field. 2) Compensation for making me ineligible to apply for SFI 26 due to the restrictions in the H of T's including no tree planting in any of my fields. 3) Most of my land being included in H of T's agreement despite the cable route occupying less than 0.5 hectares. 4) Maintaining access to my land via the B.O.A.T. from Hullavington crossroads to the edge of my fields as Limedown E involves Solar panels on one side and a Transformer site in a field adjacent to me on the other side. 5) Results of wildlife survey to make sure they are aware of Badger setts.	1) The Applicant notes the respondent's concern regarding existing agricultural field drainage, both along the proposed cable route and between his land and the receiving ditch across the adjacent Solar PV Site. The **Outline Construction Environmental Management Plan [REP6-029]** specifically requires existing agricultural field drains within the cable installation working width, identified in consultation with the landowner prior to the relevant works or encountered during those works, to be recorded. Where a field drain is disturbed by the cable installation works, it will be reinstated, diverted or otherwise made good following completion of the relevant

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			6) Payment of my agents fees.	section of construction so as to maintain the affected field drainage function. The field drainage information provided by the respondent will therefore be available to inform detailed construction planning. The **Appendix 11-9: FRA and Outline Drainage Strategy – Cable Route Corridor [REP3-063]** confirms that the permanent cable infrastructure will be below ground and that no formal operational drainage is required for the Cable Route Corridor. Across the Solar PV Panelled Areas, the drainage approach is similarly to preserve existing field-scale drainage behaviour and protect existing drainage features. Accordingly, the Scheme is not intended to sever or obstruct the existing drainage route from the respondent's field to the receiving ditch. Where existing field

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				drainage is affected by the works, its drainage function will be maintained through reinstatement, diversion or other appropriate measures. 2) The Applicant confirmed to the respondent in their meeting on 25 August 2026 that the respondent was not prevented from making any application for grant funding in the absence of a completed Option Agreement. Whilst the eventual Option Agreement restricts the planting of trees on the Option Area, the respondent is encouraged to continue under the no scheme principle, until such time as there is a completed Option Agreement in place. In the event that a scheme is entered into, and the presence or impact on the scheme results in a breach, fine, or penalty, this is a compensation event, and the respondent is entitled to make an evidenced claim to recoup their reasonable losses. The Applicant is

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				hopeful that through negotiations, the parties can work together so as to mitigate any losses, whilst not overly restricting the respondent from obtaining appropriate grant funding to support his existing farming enterprise. 3) The Applicant acknowledges the extent of the Option Area on the respondent's land. Whilst reducing the Option Area has been discussed in principle between the parties, the Applicant cannot reduce the Option area down in the absence of signed Heads of Terms, or Option agreement so as to ensure the design flexibility that will be required for the Scheme's detailed design. Notwithstanding that latter point, negotiations are ongoing, and as part of those negotiations, the Applicant is hopeful that they would be in a position to consider reducing the Option Area on the basis that a voluntary agreement can be reached.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				5) The Applicant undertook a badger survey on the respondent's landholding where it lies within the Order Limits. No active badger setts were encountered during the survey. The Applicant does note that badger setts were recorded elsewhere within the Order Limits during badger surveys in close proximity to the respondent's landholding. The Applicant is unable to disclose the locations of setts on other landholdings, as such information is treated as confidential as a matter of standard practice in order to avoid the risk of persecution or disturbance of badgers. 6) The Applicant made an interim payment for the reimbursement of the respondent's land agent's fees. This was in agreement with the respondent's land agent, and the payment was made on 10 August 2026.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JB-003	Scheme Description and DCO Process	Heads of Terms	At the meeting the points discussed included 1) The document was inaccurate and contained many errors and I felt slightly disappointed in its lack of being a professional document that I was expected to sign. I felt it was not drawn up to facilitate a circumstance that would allow me to sign.	The Applicant refers the respondent to the response contained within JB-001.
JB-004	Soils and Agriculture	Land take	2) The map of the area included still involves most of my land only one of my fields (4.50 hectares) being withdrawn from the last proposal which only took it back to the map they had previously proposed. So the proposal still involves about 60% of my total farm land.	The Applicant refers the respondent to the response contained within JB-002 Part 3, and confirms that, following CAH2, a meeting was held between the parties on 24 September 2026 to discuss the Applicant's requirement for flexibility and the reasons for including the land.
JB-005	Scheme Description and DCO Process	Easement route	3) The H of T states that the Easement strip for compensation would be the exact figure 406.63metres which suggests there is a map that shows this proposed route, showing where this	The Applicant has used a centreline of the Option Area to determine the estimated length of cable needed to cross the respondent's land. This centreline does not reflect the exact

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			exact distance was measured they denied this and refused to offer a map.	routing of the cable, and it is for that reason that a plan is not available. The primary purpose for the Applicant taking the centreline is to inform the estimated easement consideration. The approximate meterage is then extrapolated into an area, based on a 10m easement width. This provides a demonstrable calculation for the estimated easement area, and the Heads of Terms provide a mechanism to account for any cabling that goes above or below the estimated cable length; detail that will become known post construction. Following CAH2, a meeting was held between the parties on 24 September to discuss the Applicant's requirement for flexibility and potential optionality of the routes under consideration.
JB-006	Soils and Agriculture	Land access	4) The H of t demands access across my property for the duration of the agreement. It is very difficult to farm	The respondent has signed a non-intrusive survey licence, within which provides strict access notice periods and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			when anyone can access across the land without having any control over them.	associated protocol. Within the Heads of Terms, the Applicant has included notice obligations and these include the following. • Non- intrusive surveys – 24hrs minimum • Intrusive surveys – No less than 5 working days • Construction – No less than 20 working days The Applicant acknowledges that the respondent needs to be fully aware of who is accessing their land, and for what purpose and so these access provisions seek to address that as far as is practicable. These obligations will flow through into the eventual Option Agreement. The Applicant will continue to work with the respondent to ensure that his farming enterprise is not unnecessarily disrupted as far as is practicable.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JB-007	Transport and Access	Access route	5) The H of T included Clause D5 an access route of 5 metres to be shown on a map in brown. No map was included but I found a map on the enquiry website showing a route through my neighbour's and my fields from the A429 to the site of the Transformer substation at Lime Down D. The promised this would be followed up and that they were unaware of an access route but why include it in a document they intended me to sign.	During the meeting between the Applicant and the respondent on 25 August 2026, it was confirmed that an access route would be required, and the purpose for its construction. The Applicant has not shared indicative routes on individual option plans across the route. The reasoning for that is to inform and enable discussions between the parties, whilst retaining design flexibility on the part of the Applicant. Following CAH2, a meeting was held between the parties on 24 September to discuss the Applicant's requirement and optionality for substations, transformers, and associated access routes.
JB-008	Soils and Agriculture	Agri-environment schemes	6) The H of T clause C11 only allows compensation for existing Agri environment schemes not future ones I need clarification to ensure I can apply for SFI 26 which opens 22nd Sept. There is an issue that if the results of the	The Applicant refers the respondent to the response contained within JB-002 Part 2.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			developers activities affect any agreement then the area can be withdrawn from the agreement but this only applies to Force Major events and not the result of an agreement I have signed up to.	
JB-009	Soils and Agriculture	Tree planting	7) Clause C20 forbids any activity in the agreement area (60% of my land) which includes tree planting. This would forbid me replanting trees or establishing hedgerows for the 5 year duration of the agreement.	The Applicant refers the respondent to the response contained within JB-002 Part 3. The Option Agreement does not permit the planting of trees within the Option Area for the duration of the Option Period.
JB-010	Scheme Description and DCO Process	Communication cable	8) Clause D4 includes a communication cable in the trench with the electric cable. This is first time this has been mentioned and no extra payment is being offered for this despite the advantages it brings the developer. It means that over the 40/60 year lifespan of the project the risk that a fault develops along my easement route doubles so more likely further disturbances with the associated stress and battles for compensation. I feel we	The Applicant has previously explained the to the respondent the role and purpose of the communication cable. The communication cable is not a serving a separate purpose to the Scheme, instead being ancillary to the transmission cabling. The Applicant would welcome the opportunity to go through this again, and in more detail if that would be helpful.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			should explore the possibility of an annual way leave payment to cover this as other utility companies are forced to pay.	The Applicant is not able to accommodate an annual wayleave payment structure, as it does not provide the level of security that the Applicant requires in order to operate and maintain the cables and comply with the necessary obligations. Following CAH2, a meeting was held between the parties on 24 September to discuss the Applicant's requirements and optionality for differing types and routing of electrical cabling.
JB-011	Scheme Description and DCO Process	Compensation terms	9) Clause C20 states a Deed of Covenant will be placed on the land for the duration of the project 60 years. There is no mention of index linking the compensation for this as the loss will be incurred at a future date not at the time of the agreement.	The Applicant has engaged extensively with the Respondent and their land agent regarding the Heads of Terms. During these discussions, the basis of the proposed compensation and the phasing of payments have been explained. The compensation offered under the Heads of Terms relates to the rights sought by the Applicant. Should the Respondent incur any loss or disturbance arising from the temporary

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction phase, it will be entitled to submit a claim, supported by appropriate evidence, so that they are neither better nor worse off as a result of the Project. Although the Respondent's land is currently identified within the **Land Plan (Rev 3) [REP5-005]**, the precise extent of land required for construction of an access track will be determined following consent as part of the detailed design process. The extent and alignment of any access will depend on factors identified during detailed design, including whether access is required for the movement of an Abnormal Indivisible Load (AIL). The Applicant does not anticipate requiring the entirety of the Respondent's land; however, sufficient flexibility is required to facilitate the detailed design of the authorised development following the grant of the DCO.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				It is anticipated that any access rights will be required only during the construction phase and will therefore be temporary in nature. However, if detailed design confirms that access is required for the transportation of an AIL, a permanent access right will be necessary to enable the operation and maintenance of the authorised development. Should the Applicant need to rely on this right, a temporary access track would be constructed to facilitate access and, following completion of the relevant works, removed and the land reinstated. The Heads of Terms provide a mechanism for the Respondent to recover any losses arising from the exercise of these rights, subject to the submission of an evidenced claim, ensuring that the Respondent is no worse off as a consequence of the Project.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				At a meeting between the Applicant and the Respondent on 24 September 2026, the Applicant explained the alternative access requirements being considered, namely: (i) access required solely for cable construction activities; or (ii) access required for both cable construction and the possible transportation of a transformer to Lime Down D via an AIL. In relation to the proposed Deed of Covenant, this would only be required where the landowner disposes of land that is subject to rights granted to the Applicant. The purpose of the deed is to ensure that any successor in title is bound by, and takes the land subject to, those previously granted rights.
JB-012	Scheme Description and DCO Process	Survey access	10) The H of T wanted permission to carry out survey work with no fee payable there gain for no payment!	The ability to complete non- intrusive surveys is captured in the current survey licence, for which the respondent has been paid. The Heads of Terms afford the Applicant the ability to take access

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				for non- intrusive surveys, and that has been factored into the overall compensation figure. There is also the ability for the Applicant to complete intrusive surveys on the land, and a payment schedule is provided within the Heads of Terms and is paid by way of advanced compensation.
JB-013	Transport and Access	Transformer route	11) The inclusion of an access route on my agreement made me ask for confirmation on how the large and heavy electrical transformers will be transported onto site as other than my land the only other access is along the BOAT which has a low bridge and a stream ford all of which makes this route unsuitable for heavy traffic.	The Applicant confirmed during the meeting with the respondent and their land agent that a temporary access road will be constructed; the exact routing is to be defined but will fall within the Option Area. The route will be used for transporting construction materials and Abnormal Indivisible Loads to Site D. Following CAH2, a meeting was held between the parties on 24 September and discussions were held regarding the infrastructure, methods and optionality which could be delivered in relation to the respondent's land.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JB-014	Soils and Agriculture	Agreement area	12)I confirmed the I would sign an agreement that was drafted accurately and set out an accurate and also proposed a fair settlement that reflected the actual losses which will be incurred over the duration of the agreement. I defined the area I would be happy to include in the agreement which would give them all that I feel they require while still allowing me some security over my farming business. The area I proposed was a strip of ground surrounding the cable route from the transformer field site to the route of the cable on going to the A429.	The Applicant notes the comments made by the respondent. The Applicant will continue to work with the respondent and their land agent to ensure that the Heads of Terms cover the topics raised in this submission by the respondent, but also provide the flexibility required to the Applicant.
JB-015	Consultation and Engagement	Negotiation delays	Summary of important points 1) Lack of any urgency about resolving the many issues raised at the meeting	The Applicant refers the respondent to JB-001. The Applicant can also confirm that they spoke with the respondent on 23 September 2026 at CAH2, and a meeting between the respondent and the Applicant took place on 24 September 2026.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JB-016	Scheme Description and DCO Process	Document accuracy	2) The inaccuracy of a document they expected me to sign and be legally bound by it.	The Applicant refers the respondent to JB-001.
JB-017	Consultation and Engagement	Voluntary agreement	3) The above 2 points would suggest they are not serious about reaching a voluntary agreement.	The Applicant remains committed to reaching a voluntary agreement with the respondent.
JB-018	Soils and Agriculture	Agreement extent	4) Limit the area of the agreement to an area surrounding the cable route.	The Applicant refers the respondent to JB-002, Part 3.
JB-019	Scheme Description and DCO Process	Compensation	5) Consider some form of proper payment possibly index linked that reflects the actual loss that will be incurred over the duration of the project.	The Applicant will discuss the compensation offered directly with the respondent and their land agent as part of the Heads of Terms negotiations.
JB-020	Transport and Access	Transformer access	6) Clarification of the transport route for the transformers to the field neighbouring my land.	The Applicant will continue discussions in relation to the cable routing, and access route as part of the wider Heads of Terms negotiations with the respondent and their land agent.
JB-021	Hydrology, Flood Risk and Drainage	Field drainage	7) Assurances on drainage between my field and ditch across the solar field.	The Applicant refers the respondent to the response provided at **JB-002**. The **Outline Construction Environmental Management Plan [REP6-029]** requires existing agricultural field drainage

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				affected by the cable installation works to be reinstated, diverted or otherwise made good so as to maintain the affected field drainage function. The existing drainage function between the respondent's field and the receiving ditch will therefore be maintained through detailed design and construction.
JB-022	Scheme Description and DCO Process	Cable route	8) No map of route of cable being available despite an exact calculation of 406.63m being given.	The Applicant was able to provide a precise measurement for the anticipated cable length across the respondent's land. The Applicant was able to do this by working from an indicative centreline measurement. This is a commonly adopted method of establishing indicative cable lengths and the associated compensation payment. The cable lengths provided are used solely for the purpose of arriving at a compensatory amount, and not for any other purpose.
JB-023	Human Health	Health and wellbeing impacts	9) My blood pressure spikes every time I have to think about dealing with these matters. My aim is to end with an	The Applicant notes the comments made by the respondent. The Applicant has sought to provide as much information

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			agreement that allows the developer access to carry out the installation of the cable across my land but to limit the area they have access over which would limit the need for any interaction with subsequent back and forth about damage and compensation hence reducing the long term effect on my health. 10) At no time during the dealings with the developers or their agents have I seen any mention about the extreme deleterious effect they are having on my health or life expectancy. They have had two years to negotiate the agreements and they have shown no urgency, I feel they wish to steam roller over the farms which are required for the cable route without any regard for our welfare.	as is available at this stage of the Scheme to the landowner and their land agents. This is intended to ensure that negotiations are based on as well-informed a position as possible, to be able to reach an agreed position. The Applicant remains committed to working towards and agreeing the Heads of Terms in a manner that minimises stress on the respondent so far as is practicable.

5.3 Isabel Ross

Table 5-4 Isabel Ross – Additional Submission [AS-014]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
IR-001	Consultation and Engagement	Landowner Engagement	Island Green Power are grossly misrepresenting the negotiations with us as landowners on the cable route. When approached by them, we consistently say that we are not willing to have the cable route destroy our land. When reporting how negotiations with landowners are proceeding, Island Green Power say they are going brilliantly. That is a lie. Their tactic is clearly to ignore us. Then wait.until the Secretary of State gives the project the green light. The result is that we are utterly powerless and unheard.	The Applicant has had extensive dialogue with the respondent's land agent, as detailed in the **Land and Rights Communication Log [REP6-058].** Since CAH1, the Applicant has made 8 attempts to engage with the respondent and their land agent by way of letter, email and phone call. The Applicant notes the respondent's comments in relation to their unwillingness to permit the cable installation, however, does not agree that the Applicant has ignored the respondent. The Applicant remains willing to engage constructively with the respondent and to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				seek to resolve outstanding matters. However, the Applicant's ability to do so is constrained where the respondent declines to engage in dialogue.

5.4 Roberts Berry Farm

Table 5-5 Roberts Berry Farm – Additional Submission [AS-015]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
RBF-001	Socio-Economics, Tourism and Recreation	Impact on Farming Activities	The proposed cable route will have a significant detrimental impact on our farming activities during the construction period and beyond. It will cut through pasture land causing access issues for livestock.	The Applicant has responded to representations made by the owners of Roberts Berry Farm in: • Section 4.28 of **The Applicant's Response to Relevant Representations (Part 1) [PDA-009]**; • Section 4.3 of **The Applicant's Response to Submissions Received at Deadline 2 [REP3-129]**; • Section 2.14 of the **Applicant's Response to Other Parties' Responses to Examining Authority's First Written Questions [REP4-081]**; and • Section 2.20 of **The Applicant's Response to Submissions Received at Deadline 4 [REP5-098]**. The Applicant acknowledges that while some disruption to farming activities is anticipated, this is to be temporary during the construction phase and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				limited to the working width of the cable route corridor only, with working practices to enable continued access across the cable route corridor to be implemented. Following a conversation at the ASI, the respondant had stated to the Applicant that temporary relocation of cattle was a manageable exercise, should ducting and cabling installation be limited to a small number of weeks at a time. Ongoing communication in regard to the construction programme would be communicated via the Community Liaison Group (CLG) should the Scheme recieve consent. The Applicant confirms thatrestoration of the land following construction works is secured through the **Outline CEMP [REP6-029]** and **Outline SRMP [REP6-035]** by Requirements 13 and 17 in Schedule 2 of the **Draft DCO [REP6-005]**.
RBF-002	Hydrology, Flood Risk and Drainage	Flooding	Construction work will not be possible during winter as these pastures often flood.	The Applicant acknowledges that parts of the pasture may experience seasonal

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				wetness or flooding. This does not mean that construction would necessarily be precluded throughout the winter period. Construction of the Cable Route Corridor will be phased and programmed having regard to the actual ground, weather and flood conditions at the time of the works. **The Outline CEMP [REP6-029]** requires weather forecasts and flood alerts to be monitored and construction activities to be planned accordingly, together with temporary drainage, runoff management and flood-response measures. The **Outline SRMP [REP6-035]** specifically controls working in wet conditions. Soil handling is not permitted where soils are too wet or waterlogged and a rainfall protocol requires soil handling to stop during adverse rainfall and only recommence once soil and ground conditions are suitable. Accordingly, where the pasture is flooded, waterlogged or otherwise unsuitable for the proposed works,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				relevant construction and soil-handling activities would be deferred or suspended until conditions are suitable. This provides for construction to respond to local and seasonal conditions without requiring a blanket restriction on all winter working.
RBF-003	Site Selection and Alternatives Soils and Agriculture	Cable Route and Impact on Crops	The chosen route will mean the destruction of mature trees as well as an established biomass crop. This crop will take 3 to 4 years to re establish. We had a previous compulsory order in 2017 from Wessex Water. Land from this excavation is still estimated to be producing 50% in comparison to adjacent land that was not excavated. This project lacks foresight and is unwise. Please reject this application. Thank you.	Refer to responses above to RBF-001 and RBF-002. Land and soils subject to disturbance for the installation of the cables will be reinstated as soon as reasonably practicable and in agreement with the landowner, as secured through the **Outline CEMP [REP6-029]** and **Outline SRMP [REP6-035]** by Requirements 13 and 17 in Schedule 2 to the **Draft DCO [REP6-005]**. Furthermore, loss of agricultural revenue as a result of temporary works to construct the Cable Route Corridor can be compensated either through voluntary agreement with the Applicant, or through the application of compulsory acquisition powers.

5.5 Solacap UK Ltd

Table 5-6 Solacap UK Ltd – Additional Submission [AS-030]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SUK-001	Scheme Description and DCO Process	Land Interest	Re: Development Consent Order Application - Lime Down Solar Park (PINS Reference EN010168) Land at Boyds Farm, Gastard, Corsham - Plot 15-013 and adjoining land We write regarding the above Development Consent Order application, in respect of land at Boyds Farm, Gastard, Corsham, shown as plot 15-013 (and forming part of the wider site) on the Land Plan (Document Reference APP/2.2) and included within the Book of Reference (Document Reference APP/4.3). We represent Solacap UK Ltd. We hold an Option Agreement dated 26 August 2025 with GDCM Ltd, the freehold owner of this land, granting us an option to take a lease for the development of a Battery	The Applicant confirms that, following correspondence with the Respondent, the interest relating to Plot 15-013 will be included within the updated **Book of Reference [APP/4.3]**, to be submitted at Deadline 7, as a Category 2 interest. The Applicant notes that the relevant Land Registry documentation is not currently available and has therefore requested that the Respondent provide supporting documentation to enable the Applicant to understand the nature and extent of the option interest.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Energy Storage System ("BESS"). We understand our option constitutes an interest in the land, and that we should be recorded as a Category 2 person under section 57 of the Planning Act 2008 in respect of the affected plots. Having reviewed the current Book of Reference (Revision 4, August 2026), we do not believe we are currently recorded as an interest holder. Our solicitors lodged an application with HM Land Registry on 30 September 2025 to register a unilateral notice and restriction protecting our interest in advance of the current title (WT483912) being created; that application remains in progress, including a requisition currently being addressed by our solicitors arising from a subsequent registered title split. We are happy to provide further evidence of our interest, on request.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SUK-002	Scheme Description and DCO Process	Book of Reference	We would be grateful if you could: 1. Confirm receipt of this letter and record Solacap UK Ltd as a Category 2 person in respect of the affected plots in the Book of Reference;	As referred to in SUK-001 Solacap UK Ltd will be recorded as a category 2 interest in the updated **Book of Reference [APP/4.3]** at Deadline 7.
SUK-003	Consultation and Engagement	Project Correspondence	2. Provide copies of any notices, correspondence, or documentation already issued in respect of this land, and ensure we receive all future notices and correspondence relating to it, including in respect of the Compulsory Acquisition hearing scheduled for 22-24 September 2026;	The Applicant notes the response and will issue all relevant documentation following Deadline 7.
SUK-004	Site Selection and Alternatives	Cable Alignment	3. Let us know whether alternative cable alignments in this location were considered and, if so, why the current alignment was preferred; and	The Applicant confirms that alternative cable alignments were evaluated as part of the iterative site selection and design evolution process set out in **ES Volume 1 Chapter 4 Alternatives and Design Evolution [APP-056]** and the **Site Selection Assessment Report [APP-185]**. Initial search corridors and alternative routing options were

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				screened against standardised environmental, technical, and spatial criteria, including the avoidance of sensitive ecological habitats, heritage assets, residential properties, and major infrastructure constraint. The current alignment was preferred because it provides the most direct and technically viable route while utilising existing linear features, such as field boundaries and road verges, to minimise physical land take and environmental disruption. Furthermore, the Applicant confirms that the specified plot has been included within the Scheme Order Limits since project launch in Spring 2024.
SUK-005	Consultation and Engagement	Representation Procedure	4. Advise us of the appropriate procedure for making representations to the Examining Authority prior to the close of Examination on 21 October 2026.	The Applicant notes that this is a procedural matter for the Examining Authority. The Examination Timetable provides a further opportunity for submissions at Deadline 8. The respondent should refer to the latest Examination Timetable or contact the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Planning Inspectorate for further guidance.
SUK-006	Scheme Description and DCO Process	Rights	For the avoidance of doubt, nothing in this letter constitutes a waiver of any of our rights, all of which are expressly reserved. Given the imminent hearing and the close of Examination, we would be grateful for an urgent response, and would welcome a call at your earliest convenience.	The Applicant acknowledges receipt of the correspondence and notes the reservation of rights contained therein. The Applicant remains committed to constructive engagement throughout the Examination process although notes there is limited time left until Examination closes on 21 October 2026. The Applicant has not identified any planning permission application that has been submitted for the Solacap BESS project at this stage but welcomes further detail from Solacap on its project and potential interactions when this becomes available.

6 The Applicant's Response to Members of the Public and All Remaining Organisations and Businesses

6.1 Andrew Calderbank

Table 6-1 Andrew Calderbank – Deadline 6 Submission [REP6-083]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
AC-001	Hydrology, Flood Risk and Drainage	Flood Risk	I am making further representation to you with regard to the risk of an increase in flooding events and their severity in relation to two properties (my neighbors and my own) at Foxley if the proposed Development goes ahead in it's current form. This follows on from my previous representation (REP1A-023) and reflects my review of the following updated documents from the Developer: REP5-047 / 6.3 Environmental Statement Volume 3 Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 5) (Clean) REP5-049 / 6.3 Environmental Statement Volume 3 Appendix 11-3 Flood Risk	The Applicant notes the further representation. The relevant consideration is whether the Scheme would increase or redirect runoff towards Foxley. As addressed in **AC-002 to AC-005**, the Solar PV Panelled Areas will remain predominantly permeable, existing drainage pathways will be retained and runoff from areas requiring formal drainage will be attenuated and controlled. The Applicant therefore considers that the Scheme will not increase flood risk at Foxley.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Assessment and Drainage Strategy Lime Down B (Rev 5) (Clean) REP5-051 / 6.3 Environmental Statement Volume 3 Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 5) (Clean) REP5-053 / 6.3 Environmental Statement Volume 3 Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 5) (Clean) REP5-055 / 6.3 Environmental Statement Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 5) (Clean)	
AC-002	Hydrology, Flood Risk and Drainage	Flood Risk in Site C	All these documents are relevant as Norton Brook will be the recipient of run-off from across the above Solar PV sites to varying degrees, but especially C, which is the largest Solar PV area being proposed. Norton Brook will therefore be particularly vulnerable to any changes in the run-off characteristics as a result of the proposed scheme, and of particular	The Scheme does not propose to collect runoff from the Solar PV Panelled Areas and discharge it to Norton Brook. These areas will remain predominantly permeable, with existing ground levels, overland flow routes and drainage pathways retained. Formal drainage is provided for discrete infrastructure areas

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			concern to me as my property is at risk of flooding from it.	where required, with runoff attenuated and discharged at controlled rates. The potential for Solar PV Panels to redistribute rainfall, and the measures which prevent this resulting in increased runoff from the Site, have been addressed in FHW2.9 of the **Applicant's Response to the ExA's Second Written Questions [REP5-098]**, pp. 212-215. The principal controls are soil condition, vegetation cover, compaction and hydraulic connectivity, which are secured and monitored through the relevant environmental management plans as listed in the Applicant's response to FHW2.9. The Scheme-wide runoff-management approach has been agreed with Wiltshire Council as Lead Local Flood Authority, as recorded in the **Statement of Common**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Ground with Wiltshire Council [REP6-045], item 3.7.4. The Applicant therefore considers that the Scheme will not materially increase runoff towards Norton Brook or flood risk at Foxley.
AC-003	Hydrology, Flood Risk and Drainage	Control of Run-Off	The Developer continues to rely on the (contested) principle that established vegetation under the Solar PV panels will be sufficient to control run-off. This confirms that (a) there is a recognized issue that requires mitigation in some form, and (b) that until the vegetation is established there will be no run-off mitigation. The fact that such vegetation will take time (3-5 years?) to become established, leaves our properties particularly vulnerable to excessive run-off during those years. There is no evidence that this 'window' of risk has been considered by the Developer.	The Applicant does not rely solely on mature vegetation to manage runoff and there is no unmitigated three to five-year vegetation establishment period. During construction, Section 3.6 and Table 5 of the **Outline CEMP [REP6-029]** provide controls for construction runoff, sediment and temporary drainage, including the Water Management Plan. Temporary drainage is monitored throughout construction and Section 6 provides the associated monitoring, reporting and corrective-action procedures.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Soil condition is separately controlled through Section 1.8 of the **Outline SRMP [REP6-035]**. This includes restrictions on trafficking and soil handling in unsuitable conditions, inspection for compaction before panels are fixed, remediation where compaction is identified and ongoing operational monitoring of matters including surface-water ponding and vegetation failure. Vegetation establishment is addressed through Section 1.3 of the **Outline LEMP [REP6-037]**, including the provisions for *Grassland Creation and Early Establishment*. The Outline LEMP expressly recognises that poor vegetation establishment can reduce infiltration and increase runoff if left unmanaged. It therefore requires first-year inspection of establishing grassland and reseeding where establishment is inadequate. Section 1.4 provides more frequent

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				habitat monitoring during the first five years so that problems can be identified and remedial management undertaken. The reference to grassland taking time to develop should not therefore be interpreted as a period during which runoff is uncontrolled. The time required for a diverse grassland habitat to develop is distinct from the establishment and maintenance of vegetated ground cover relevant to runoff management. Construction-phase drainage and soil controls apply from the outset and vegetation condition continues to be inspected and managed as the grassland develops. During operation, Section 3.6 and Table 5 of the **Outline Operational Environmental Management Plan [REP6-031]** require inspection for concentrated or channelised runoff,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				erosion, scour, rutting and sediment movement, including following significant rainfall events. Ground cover beneath and between the Solar PV Panels is also monitored for persistent bare ground, poor vegetation establishment and erosion. Where required, remedial measures include reseeding, soil loosening and localised erosion control. Section 6 provides the associated monitoring, reporting and corrective-action framework. These measures therefore provide continuous control through construction, grassland establishment and operation rather than relying upon vegetation reaching a mature condition before runoff is managed. The relationship between panel runoff, soil condition, vegetation establishment, temporary drainage, erosion and corrective action is also set out in FHW2.9 of the **Applicant's Response to the Examining Authority's**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Second Written Questions [REP5-097], pp. 212-215. Wiltshire Council, as Lead Local Flood Authority, accepts at item 3.7.4 of the **Statement of Common Ground with Wiltshire Council [REP6-045]** that the Scheme relies upon a combination of formal drainage infrastructure and non-structural SuDS measures and is satisfied that the role and function of those measures have been sufficiently explained and secured within the wider flood risk and drainage management framework.
AC-004	Hydrology, Flood Risk and Drainage	Drainage Hierarchy	I also note that the Developer has a "Drainage Hierarchy" which includes 'Priority 3: Discharge to an Above-Ground Surface Water Body'. From my perspective, this appears to be a potential problem rather than a solution.	The drainage hierarchy does not represent a proposal to discharge uncontrolled runoff from the Solar PV Panelled Areas to a watercourse. It establishes the order in which discharge options for areas requiring formal drainage are considered. Where discharge to an above-ground surface

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				water body is required, runoff will first be attenuated and discharged at the controlled rate specified by the relevant drainage strategy. Priority 3 therefore represents a controlled drainage solution and does not result in an uncontrolled increase in downstream runoff. The overall approach to formal drainage and non-structural SuDS has been agreed with Wiltshire Council as Lead Local Flood Authority, as recorded in the **Statement of Common Ground with Wiltshire Council [REP6-045]**, item 3.7.4.
AC-005	Hydrology, Flood Risk and Drainage	Flood Risk	It is frustrating that the Developer is persisting within current documents with statements about no reports of flooding in the vicinity, although I first reported property flooding as part of the Planning Inspectorate OFH-1 meeting on the 21st of April. Given the history of flooding of the two cottages at Foxley by Norton Brook, it's remarkable that the Developer has not made any effort to investigate the specific	The Applicant acknowledges the respondent's account and photographic evidence of historic flooding at Foxley. References within the FRA suite to an absence of recorded or reported flooding reflect the datasets reviewed and should not be interpreted as meaning that flooding has never occurred at the properties.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			risks to them. I am requesting that the Developer undertakes a specific assessment of the flood risk to the two properties in Foxley and publishes the results accordingly, to enable the Planning Inspectorate, and others, to have a more informed understanding of the risks.	The relevant consideration for the Scheme is whether it would increase existing flood risk. For the reasons set out in AC-002 and AC-003 above, the Solar PV Panelled Areas remain predominantly permeable, existing drainage pathways are retained, construction-phase runoff and compaction are controlled, and runoff from areas requiring formal drainage is attenuated and controlled. The Applicant therefore does not consider that a separate property-specific hydraulic assessment is necessary and concludes that the Scheme will not increase flood risk at Foxley. The Scheme-wide runoff-management approach has been agreed with Wiltshire Council as Lead Local Flood Authority, as recorded in the **Statement of Common**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Ground with Wiltshire Council [REP6-045], item 3.7.4.
AC-006	Hydrology, Flood Risk and Drainage	Photographic Evidence of Flooding Submitted by Respondent.	*Applicant notes the respondent attached following pictures for reference:* 	The Applicant acknowledges the photographs as evidence of the respondent's experience of existing flooding at Foxley. The photographs do not alter the assessment of the Scheme's effect on downstream flood risk. The implications of the Scheme for runoff and flood risk at Foxley are addressed in AC-002 to AC-005 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			 	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				

6.2 Andrew Pivars

Table 6-2 Andrew Pivars – Comments on the Equine Business Report [REP6-084]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
AP-001	Socio-Economics, Tourism and Recreation	Equine Business Report	Following the release of the Equine Business Report relating to the proposed Lime Down Solar Park, I feel once again that the developers have somewhat missed the mark in regards to the impact to the local community and in this case specifically, the local equine community. As a practicing farrier based less than three miles from a proposed site, I am hugely disappointed that I have not been included in further impact evaluations to the industry. I not only service clients at every property on [REDACTED]. Not only will the solar farm have an economic effect to my business but I also breed and graze young stock bred for showjumping on [REDACTED]. The report fails to mention the entire sports horse sector, which in itself contains showjumping, dressage and event horses.	The Applicant has provided the **Equine Business Report [REP5-105]** in response to the requests made by the Examining Authority, Wiltshire Council, and Interested Parties to provide more information on the likely impacts of the Scheme to equine industries affected by the Scheme's siting. While The Applicant was aware of Mr Pivars' business as a farrier and has previously responded to his representations in **The Applicant's Response to Written Representations [REP2 039]**, a direct personal or business address was not held by the project team at the time the baseline questionnaire survey was distributed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Nevertheless, the Equine Business Report evaluates potential effects across both directly affected equestrian establishments and the broader supporting supply chain, within which farriers and mobile micro contractors are specifically grouped and assessed. The **Equine Business Report [REP5-015]** has however sought to include the overall effects to directly effected equine businesses, and the wider value/supply chain, to which Mr Pivars' business would be grouped under. With regard to practical site operations, the Applicant notes that horse shoeing ordinarily follows a periodic cycle of 4 to 8 weeks. Given the temporary and phased nature of construction activities in closest proximity to known paddocks, it is anticipated that the physical works near any individual facility can be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				communicated to allow for advance planning for routine shoeing periods. Furthermore, advance communication through the Stakeholder Communications Plan (secured via the **Outline Construction Environmental Management Plan [REP6-029]** by Requirement 13 of Schedule 2 to the **Draft DCO [REP6-005]**) will enable construction teams to be informed of when farriers are present on site
AP-002	Socio-Economics, Tourism and Recreation	Equine Business Report	Supporting evidence in the report is poorly researched and shows a distinct lack of understanding of the industry leaving the author with little to no credibility on the matter. The report uses Christensen J. W. 2005, (Fear in Horses) to incorporate the idea of a 5-30m flight zone. It is worth noting that the stimuli in this case was a 75cm stationary traffic cone placed next to the equines feed source and data was primarily collected using heart rates as a gauge of fear. Christensen J. W. 2005	The Applicant prepared the **Equine Business Report [REP5-105]** using a multidisciplinary approach combining specialist veterinary opinion, primary baseline engagement, and peer reviewed academic research. The study by Christensen et al. (2005) evaluates equine behavioural and physiological responses to novel visual, olfactory, and auditory stimuli. Assessing

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			also mentions other studies where the stimuli include artificially produced boar smell, and eucalyptus oil!	stimuli across these distinct sensory pathways is directly relevant to the Scheme, as potential environmental changes during construction and operation may encompass acoustic, visual, and environmental factors. Measuring heart rate provides a robust first line evaluation of fear and stress in equines before physical flight occurs. When a horse is alerted to a stimulus perceived as a potential threat, the sympathetic nervous system is activated via the release of adrenal hormones. This physiological response prepares the animal for flight by raising heart rate, blood pressure, and blood glucose levels. Tracking heart rate therefore captures the immediate physiological stress response that precedes overt behavioural reactions such as bolting or fleeing.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The literature demonstrates that horses adapt to novel stimuli through habituation, which represents an adaptive change in behaviour resulting from experience. Where a novel visual, auditory, or olfactory stimulus is not accompanied by a negative or painful experience, the fear response is not reinforced, and the horse learns to ignore the stimulus over time. Research indicates that horses habituate rapidly to novel non threatening noises, often requiring between one and seven repetitions for habituation to occur. The Christensen study focused on young, relatively unhandled stallions, offering valuable scientific insight into how naive horses perceive novel stimuli. Demonstrating that unhandled or younger horses undergo habituation highlights the adaptability of equines generally. Well handled thoroughbreds and competition horses, which are accustomed to regular human handling, training, and varied environments, possess smaller flight

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				zones and higher tolerance to novel surroundings.
AP-003	Socio-Economics, Tourism and Recreation	Construction Site Practices	None of the studies include the heavy industry construction site practices involved in the development of a solar farm. Nor do they use the uncontrolled environment of a herd in a paddock.	The Applicant acknowledges that there is currently no established regulatory guidance or statutory methodology specifically for assessing noise induced behavioural changes in horses or livestock. In the absence of bespoke guidance, The Applicant adopted an accepted methodology based on expert advice and established precedents from other major energy developments, including the Sunnica Energy Farm. Under this methodology, which was accepted by the Secretary of State, an animal's decibel processing is considered sufficiently similar to human hearing that established human noise thresholds provide a fair benchmark for evaluating amenity impacts on equestrian facilities, paddocks, and stud farms. The assessment within the **Equine Business Report [REP5-105]**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				incorporates peer reviewed academic literature evaluating equine behavioural and physiological responses to visual and auditory stimuli. This research demonstrates that horses naturally habituate to non threatening acoustic and visual stimuli when there is no associated physical threat. When horses are turned out in paddocks, their natural behavioural response to new or distant noise is to move toward the side of the field opposite the activity, which increases physical separation and reduces perceived risk. The Applicant addresses the operational realities of solar farm development by highlighting that construction does not occur simultaneously as a continuous, site wide industrial activity. Works are carried out progressively across defined phases, including site setup, access track

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				preparation, and piling. Specific noisy activities such as piling are localised and temporary, rather than constant across the site. Rather than relying solely on literature or general assumptions, the Applicant has secured comprehensive physical and operational controls tailored to working adjacent to paddocks as set out in Table 3 "Summary of Mitigation and Monitoring Measures" in the **Equine Business Report [REP5-105]**.
AP-004	Socio-Economics, Tourism and Recreation	Equine Business Impacts	There are many studies that will go on to show that there is little in the way of predictability in the horse when scared. I would suggest that the report should have looked into studies carried out on Belgian police horses that indicate that there is no limit to the flight zone of the frightened horse. Studies using sound frequency as stimuli quoted in the report offer no supporting evidence to support the theory that horses will become accustomed to	The Applicant notes that horses kept in rural environments routinely encounter agricultural equipment, tractors, and heavy machinery that generate acoustic and visual disturbances comparable to solar farm construction activities. Scientific literature and veterinary assessments confirm that horses are capable of adaptive learning and habituation when exposed to novel visual or auditory stimuli. When a stimulus is repeated without

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			site works, given that the report offers no indication of previously tested sound frequencies from this type of development. The studies concentrated on repetitive habitual or white noise. Not the varying levels of noise associated with heavy industry.	associated harm or negative consequences, the fear response is not reinforced, and the animal gradually pays less attention to the disturbance. The Applicant highlights that when turned out in paddocks or pastures, horses initially employ aversive positioning, such as moving to the far side of the field away from the source of noise or activity. This natural behavioural adjustment increases the physical separation distance between the horse and the stimulus, reducing perceived threat levels. Over time, as the horse observes that the activity presents no physical danger, behavioural habituation occurs and reactivity diminishes. The Applicant recognises that physiological arousal and behavioural reactions do not always align identically.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				As demonstrated in studies involving police horses, equines may exhibit a brief, sharp sympathetic stress response (such as a temporary increase in heart rate) when encountering novel stressors. While physiological arousal can resolve quickly in some individuals or remain elevated longer in others, behavioural habituation is widely observed, resulting in controlled, limited behavioural responses to ongoing environmental stressors. The Applicant evaluates acoustic impacts taking into account the hearing range of equines, which spans 55 to 33,500 Hz. Research demonstrates that horses habituate to repeated distracting sounds, with habituation typically occurring within one to seven repetitions provided the sound is not accompanied by an aversive experience. Furthermore, construction noise across the Scheme will not occur as a uniform, continuous industrial output;

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				rather, activities such as piling or earthworks are localised, progressive, and temporary in nature. To manage varying noise levels and safeguard sensitive equine receptors, The Applicant has committed to practical, site specific mitigation measures as set out in Table 3 "Summary of Mitigation and Monitoring Measures" in the **Equine Business Report [REP5-105]**
AP-005	Socio-Economics, Tourism and Recreation	Equine Business Reports	I find it disappointing that the report used Equine Canada, and sought to so heavily quote from their hand book "Equine Canada, National Farm Care Council". The United Kingdom has an enviable wealth of knowledge in the equine industry and industry specific guidance could have been gathered through the British Federations and associated bodies. All of which have a far greater understanding of the management practices of horses in this country. In the acquisition of poorly selected evidence,	The Applicant clarifies that the citation of guidance published by Equine Canada and the National Farm Animal Care Council within the **Equine Business Report [REP5-105**] was utilised specifically to illustrate the fundamental biological principles of an equine flight zone and field of vision. Equines share identical underlying physiological structures and sensory mechanics regardless of geographic location, meaning that visual fields, hearing capabilities, and innate prey responses to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the report has done nothing to easy any concerns of both human and equine safety during the period of construction. Furthermore, it highlights the authors lack of understanding and their will to circumvent real issues with the development by using poorly selected literature sources and quotes.	novel stimuli operate identically in horses within the United Kingdom as they do in Canada. The geographic origin of the reference document is therefore irrelevant to the validity of the underlying physiological and behavioural data presented. Furthermore, the Applicant notes the baseline review and assessment within the **Equine Business Report [REP5-105]** drew extensively on UK specific industry context, incorporating data from British Equestrian alongside primary engagement with local equestrian facilities and expert veterinary input. The inclusion of published international literature to define universal physiological traits such as flight zones and fields of vision complements UK specific evidence

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and does not undermine the robust evaluation of horse health, handler safety, and site specific mitigation measures secured across the Scheme
AP-006	Socio-Economics, Tourism and Recreation	Equine Business Impacts	In regards to the practical issues I face as a business owner, as I explained to Will Threlfall on his site visit to West Park Farm on 11th June 2026. I base my financial forecasts on the basis that each horse is worth between per annum to my business. The destruction of local equine businesses around the selected sites will have a crippling effect on my own business.	The **Equine Business Report [REP5-105]** concludes that it does not anticipate that the Scheme would lead to significant financial or employment losses to any equestrian facilities immediately affected by the Scheme. As such, indirect effects to the value or supply chain (such as farriers) is also not anticipated to be significant.
AP-007	Socio-Economics, Tourism and Recreation	Equine Business Impacts	During the site visit to West Park Farm the sight of the visitors spoked the horses I was working on resulting in them getting loose and left one mare with an open wound that required treatment. Suggestions that horses in these numbers can be managed in a way to avoid issue is both naive and disingenuous. I remain concerned about my own safety in trying to maintain the welfare of horses in the	The Applicant acknowledges the comments regarding the site visit at West Park Farm and notes the reported incident during the visit. The Applicant understands that horses maintained within established equestrian facilities generally possess a degree of habituation to routine human interaction,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			close proximity of heavy industrial construction site, I do not believe there is president for having large scale development in such close proximity to equestrian properties of this kind.	as human presence is a standard aspect of daily equine care. The Applicant remains committed ensuring that animal welfare and handler safety are fully protected throughout all project phases. The Applicant has secured robust mitigation measures including physical buffer areas, temporary acoustic screening, stopping work protocols, and early as set out in Table 3 "Summary of Mitigation and Monitoring Measures" in the **Equine Business Report [REP5-105].**
AP-008	Socio-Economics, Tourism and Recreation	Equine Business Impacts	As a priority I hope that those involved in the development of the Lime Down Solar Park realise the seriousness of the impact to the local communities and with particular attention to the equine industry which has a vital role in the local community in this area. Thus far the report looks written thin in expertise with little in	The Applicant has sought to ensure that impacts on equestrian business has been included at all stages of the DCO application, starting with their high-level assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the way of facts and understanding to both human and equine welfare.	The knowledge and competence of the Applicant's team involved in delivery of the **Equine Business Report [REP5-105]** is set out at Section 1.5 therein. This demonstrates that the team has a collective experience of equine welfare and understanding economic impacts, to which the report is directed.

6.3 January Farrington

Table 6-3 January Farrington – Comments on the Equine Business Report [REP6-085]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JF-001	Socio-Economics, Tourism and Recreation	Equine Business Report	Below are my comments on the Equine Business Report submitted by the Applicant at Deadline 5. Whilst the Applicants Equine Business Report describes in more detail the baseline and potential impact pathways it fails to convert those findings into appropriate conclusions.	Whilst the Applicant had considered its pre-application assessments satisfactory to understand the likely effects on equine businesses, and how mitigation should be applied, the Applicant has nonetheless provided an **Equine Business Report [REP5-105]** to the examination upon request by the Examining Authority to directly respond

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Whilst I continue to disagree with the Applicant's conclusions, the report at least now recognises a far more extensive and sensitive equine receiving environment than was identified in the original Environmental Statement. It now acknowledges commercial breeding enterprises, specialist supporting businesses, the importance of client confidence and business viability, and the wider economic significance of the local equine sector. But my principal concern is that this substantially expanded baseline has resulted in remarkably little change to the Applicant's conclusions. Therefore, if the baseline has changed so significantly, why haven't the conclusions? The report still describes the original methodology in the ES as "robust and	in more detail to matters of equine health and economic impacts to individual businesses. Where new or more detailed information has become available during the Examination, the Applicant has considered that information and, where necessary, reviewed the relevant assessment conclusions and mitigation. The Applicant is confident that the assessment of economic effects in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** is robust, and the assessment outcomes are supported by the later examination submissions made by the Applicant in the form of the **Equine Business Report [REP5-105]** and the **Technical Note on Impacts to Non-Equine Businesses [REP5-111]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			sufficient" despite requiring a 72-page Equine Business Report halfway through the Examination.	
JF-002	Socio-Economics, Tourism and Recreation	Routes	Our local roads are not simply access routes to PRoWs. As we have identified these are training routes, conditioning routes, rehabilitation routes and everyday infrastructure for such a heavily equestrian landscape yet the applicant still appears to treat these simply as transport corridors. Who, within the applicates report reaches these conclusions? Veterinary opinion and economic/business conclusions are different disciplines.	The Applicant recognises that local roads and lanes in the area serve as training, conditioning, and rehabilitation routes for local equestrian facilities, rather than merely functional access corridors to the Public Rights of Way network. To address interactions between construction traffic and equestrian road users, the Applicant has committed to a comprehensive package of transport management measures secured through the **Outline Construction Traffic Management Plan [REP6-041]** (secured by Requirement 15 of Schedule 2 to the **Draft DCO [REP6-005]**) and the **Outline Public Rights of Way and Permissive Paths Management Plan [REP1 104]** (secured by Requirement 16).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The assessment of equestrian facilities undertaken in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, identified and assessed equestrian facilities based on the Scheme's likely impacts to paddocks and stables where horses were assumed to be kept, and the impacts to horses and riders on the surrounding PRoW and highway network. Impacts to users of local roads have been considered within the **Equine Business Report [REP5-105]** under section 4.2, with respect to impacts from on-site noise, HGV movements, and access to and use of PRoWs. This section also sets out the mitigation measures that the Applicant has committed to, to ensure that equestrian users of the local highway network are

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				kept safe or are fully informed of where HGV movements will be located. With these measures in place, the Applicant is confident that there are no significant adverse effects to equestrian highway users, as was assessed in **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** (under the receptor of non-motorised users). The Applicant also confirms that the assessment of motorised user impacts confirms no significant adverse effects to driver delay, and as such, no resultant significant adverse effects to equine businesses being able to access their facilities by road, receive supplies, or benefit from emergency care access for their horses.
JF-003	Socio-Economics, Tourism and Recreation	Equine Business Impacts	The Applicant places considerable reliance on horses habituating to disturbance. In my experience operating a commercial Thoroughbred breeding enterprise, this does not reflect the continual turnover of mares, foals,	The Applicant notes the comments regarding Thoroughbred breeding operations and the turnover of horses, and clarifies that scientific literature evaluated within the **Equine Business Report [REP5-105]** demonstrates that

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			yearlings and boarded horses, many of which arrive with no previous exposure to this environment.	equines habituate rapidly to novel auditory stimuli, typically within one to seven repetitions where the noise is not accompanied by an aversive experience. While initial vigilance may occur, reactivity diminishes progressively as animals adapt to non-threatening background sounds. Furthermore, because construction works within any specific area near a facility are localised, temporary, and progress across defined phased periods of a few weeks rather than occurring continuously site wide, only a small proportion of transient or resident stock will be present in proximity to active construction faces at any given time. Measures to reduce noise and visual impacts from construction activities, principally the locating of temporary noise screens in combination with existing vegetation, have been secured through the **Outline Construction Environmental Management Plan**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				[REP6-029] by Requirement 13 of Schedule 12 to the **Draft DCO [REP6-005]**.
JF-004	Socio-Economics, Tourism and Recreation	Questionnaires	I have already raised concerns at Deadline 4 over the transparency of IGP's questionnaire as to who received the questionnaires, who replied, why anonymised results haven't been disclosed and how their conclusions were reached.	The Applicant notes this comment and refers to its response to the concerns raised in Ms Farrington's Deadline 4 submission in the **Applicant's Response to Submissions Received at Deadline 4 [REP5-098], JF-001 to JF-014.**
JF-005	Socio-Economics, Tourism and Recreation	Equine Business Impacts	The Applicant repeatedly relies on 15m - 30m as a generic flight zone yet the applicant themselves describes West Park Farm and Ladyswood Stud as amongst the most sensitive receptors. Why therefore wasn't a genuinely site specific assessment undertaken?	As noted within the **Equine Business Report [REP5-105**], the information on a horse's flight zone is informed by the following sources of information: 1. Equine Canada, National Farm Animal Care Council (2013). Code of Practice for the care and handling of Equines [Appendix G: Understanding Flight Zone, Point of Balance and Field of Vision]. ISBN: 978-1 927392-40-9 2. Birke, L. Hockenhull, J. Creighton, E. Pinno, L. Mee, J.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Mills, D. (2011). Horses' response to variation in human approach. Applied animal behaviour. 134 (1-2): 56-63. While published literature does not explicitly define any statutory construction separation distances for equines, established principles of equine behavioural science confirm that physical distance directly correlates with impact severity, whereby greater physical separation significantly reduces threat perception, limits sympathetic nervous system arousal, and prevents flight reactions. When a novel stimulus directly penetrates a horse's flight zone between five and thirty metres, an immediate evasive flight reaction occurs 30m is considered a professionally understood.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The studies cited, alongside the further studies submitted in the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 8 and Responses to Action Points [EN010168/EXAM/9.83],** refer within their methodologies to flight zones of less than 30m. The Applicant therefore sought to adopt the most precautionary distance identified from the findings of these studies. The Applicant acknowledges that when turned out in pasture fields, horses may naturally employ aversive positioning by moving to the boundary opposite active construction, thereby increasing physical separation and maintaining distance well beyond their flight zone. Rather than relying solely on handling concepts or flight zone dimensions in isolation, The Applicant secures mandatory physical and operational controls across the Schemes. Where

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction works take place within 30m of fields or facilities containing horses, temporary acoustic and visual screening will be erected to suppress noise and eliminate visual triggers. These measures and their secured locations are set out in Table 3 of the **Equine Business Report [REP5-105]**
JF-006	Socio-Economics, Tourism and Recreation	Equine Business Impacts	Overall, whilst the Applicant has undertaken considerably more work than in the original Environmental Statement, we remain concerned that the assessment framework is fundamentally incomplete. The report continues to assess equestrian businesses primarily through visual amenity, traffic and Public Rights of Way rather than considering how commercial equine businesses, particularly Thoroughbred breeding enterprises, operate and what determines their viability.	The Environmental Statement is extensive, comprehensive and a robust documentation of the potential impacts and environmental effects across a wide range of disciplines. The scope of the Environmental Statement is agreed via the formal Scoping process and Scoping Opinion, together with ongoing consultation with non-statutory and statutory consultees. The **Equine Business Report [REP5-105]** was specifically commissioned to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				evaluate the impacts of the Scheme on equine business viability directly. The Applicant expanded the assessment framework to examine how environmental changes interact with commercial operating models, client and investor confidence, reputational standing, and financial resilience across different equestrian business sectors. The Applicant explicitly addresses the operational mechanics and commercial drivers unique to thoroughbred breeding and stud operations within the **Equine Business Report [REP5-105],** and recognises that thoroughbred breeding enterprises operate within high value international bloodstock systems, with primary objectives focused on breeding horses to race or rearing foals and youngstock for public sale and auction at weanling, yearling, or two year old stages. The Applicant acknowledges that these enterprises rely on careful

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				genetic selection, dedicated broodmare management, foaling supervision, youngstock rearing, stallion services, specialist facilities, and an established commercial reputation. The **Equine Business Report [REP5-105]** acknowledges that thoroughbred breeding enterprises represent capital intensive businesses with high fixed operating costs, where viability is governed by bloodstock supply and demand, economic conditions, buyer confidence, and maintaining high standards of horse health and welfare. The report specifically identifies stud farms and thoroughbred operations as commercially sensitive receptors due to their reliance on owner and buyer confidence.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Through this targeted framework, the Applicant demonstrates that the implementation of secured physical standoffs, landscape buffers, noise screening, and advance stakeholder liaison as identified in Table 3 of the **Equine Business Report [REP5-105]** are sufficient so that construction and operational activities (considered independently and together) will not alter the local environment or operational routines to an extent that would undermine commercial viability or market standing for thoroughbred breeding businesses. Both intra-project and inter-project cumulative impacts have been assessed and are reported within **Environmental Statement Chapter 16 Socio-Economics [APP-068]**, Section 16-13 and **ES Chapter 21 Cumulative and In-Combination Effects [APP-073].**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JF-007	Socio-Economics, Tourism and Recreation	Impact pathways raised throughout Relevant Representations, Written Representations and Oral Submissions	In my opinion, the Applicant has not identified all of the relevant impact pathways raised throughout our Relevant Representations, Written Representations and Oral Submissions. Whilst some impacts are acknowledged, many are either omitted entirely or recognised only briefly before being dismissed without any meaningful site-specific evidence.	Section 2 of the **Equine Business Report [REP5-105]** has sought to present an overview of the main themes arising from relevant representations and written responses submitted to the Examination to date in relation to potential impacts on equine facilities and businesses. Specific representations and responses considered, as referenced in the **Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]** question SE2.8, have included **[REP4-116], [REP4-117], [REP4-107], [REP4 108], [RR-0145], [RR-2102], [RR-0472], [RR-0098]** and **[RR-3583]**. The Applicant has sought to provide direct responses to Relevant Representations, Written Representations and Oral Submissions throughout the examination process.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JF-008	Socio-Economics, Tourism and Recreation	Table 2 – Assessment of Impact Pathways	I do not consider that the Applicant has identified all relevant construction or operational impacts affecting commercial equine businesses. Insufficient consideration has been given to: • Client confidence and reputational damage • Commercial viability and long-term business resilience • Bloodstock insurance and insurability • Disruption to breeding, foaling and sales preparation • The continual arrival of new mares, foals, yearlings and boarded horses which have not previously habituated to the environment • Staff, vet and handler safety during routine and emergency husbandry procedures • Cumulative impacts arising from construction and subsequent operation	The Applicant notes the concerns and the position raised and refers to response to JF-006.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• The combined welfare and commercial consequences of these impacts. Many of these issues have been consistently raised throughout the Examination but remain inadequately assessed.	
JF-009	Socio-Economics, Tourism and Recreation Noise and Vibration	Acoustic Fencing / Indoor Facilities / Alternative Turnout	I do not consider these to represent realistic mitigation for a commercial Thoroughbred stud. Stud farms cannot simply relocate mares and foals or permanently alter turnout and management practices without significant welfare, operational and commercial implications. These measures also transfer additional costs and management burdens onto our business rather than mitigating the source of the impact. The issue is also not simply whether horses are "more sensitive". The principal concern is commercial	In addition to referring to response to JF-006, the mitigation framework is not designed to force the relocation of stock, compel permanent changes to turnout practices, or transfer management costs onto local enterprises. Instead, the Applicant implements a responsive package of controls, including embedded site buffers, early advance notification via an independent equestrian expert, and phased construction programming. By managing acoustic and visual disturbance directly at source, these measures ensure that daily operational routines remain stable, thereby

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			confidence. Owners of high-value bloodstock choose where to keep their horses based upon confidence in the environment, management and welfare standards. Loss of confidence may lead to horses being relocated irrespective of whether any physical incident has yet occurred. The Applicant's original assessment concluded that significant operational noise effects would not occur, yet this report now proposes acoustic fencing as potential mitigation. If operational noise is not anticipated to increase, it raises questions as to why acoustic fencing is now considered necessary."	safeguarding animal health, protecting business viability, and maintaining commercial confidence among clients and breeders. Regarding operational noise and acoustic barriers, The Applicant clarifies that temporary acoustic screening is deployed as a precautionary measure during temporary construction activities, such as piling or horizontal directional drilling, rather than as a permanent operational requirement. Operational equipment generates predictable, low level noise that decays rapidly with distance. Equine noise sensitivity and behavioural reactions depend upon sound frequency, whether noise is constant or intermittent, distance from the source, and individual temperament. Because equines possess greater sensitivity to higher frequencies and lower sensitivity to lower frequencies, horses tend to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				habituate rapidly to constant low frequency operational hums. Where temporary acoustic barriers are installed during construction, they serve to reduce the detectable sound level for horses in nearby paddocks while providing visual separation, ensuring that noise remains well below levels that would trigger fear or flight responses.
JF-010	Socio-Economics, Tourism and Recreation	Physiological Responses	[REDACTED] veterinary review addresses these issues in detail. In summary, our concern is not whether horses are capable of habituation in general, but that the Applicant relies too heavily upon this general proposition to justify conclusions of low residual risk without adequately considering the characteristics of our commercial Thoroughbred stud. The veterinary report also highlights that behavioural habituation should not be assumed to equate to physiological adaptation or the absence of welfare and commercial consequences.	The Applicant clarifies that an acute physiological response to a novel visual or auditory stimulus is a natural survival mechanism in equines, mediated by the sympathetic nervous system through the temporary release of hormones and an elevated heart rate. Experiencing a brief physiological response to an unexpected sound or movement does not in itself compromise equine health or welfare. Welfare is negatively impacted when stress becomes chronic, prolonged, or

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				repeated as a result of ongoing aversive stimuli. Where a novel stimulus is not accompanied by a harmful or painful experience, physiological arousal resolves back to homeostasis via natural feedback mechanisms, allowing the horse to adapt and perceive the stimulus as non-threatening. The Applicant does not rely on a general assumption of habituation in isolation, nor has the assessment treated commercial Thoroughbred studs as generic receptors. **The Equine Business Report [REP5-105]** explicitly evaluates the specific operational characteristics of stud farms, acknowledging that these enterprises manage high value, sensitive stock including broodmares, foals, and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				youngstock alongside time critical veterinary and farrier schedules. Because construction activities near any individual stud farm are phased, localised, and temporary, and because these physical and operational controls prevent high level or sudden acoustic spikes, the Scheme will not cause prolonged or repeated physiological stress.
JF-011	Construction and Decommissioning	Construction Mitigation	Whilst improved communication and engagement are welcome, many of the proposed mitigation measures do not actually remove or even reduce the impacts identified. Instead, they rely upon our business adapting operations around the applicant's construction programme. Similarly, the appointment of an equestrian representative to a Community Liaison Group may improve communication but would not itself	The Applicant clarifies that the mitigation framework does not rely solely on future liaison or local businesses altering their operations, but embeds physical design standoffs and direct source suppression to eliminate or reduce environmental disturbances. Physical safeguards include embedded design offsets avoiding works directly adjacent to sensitive foaling areas, temporary acoustic and visual screening erected within 30 metres of fields or facilities, stopping work protocols requiring workers to cease noise generating work

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			mitigate noise, traffic, vibration, moving machinery or the practical difficulties faced by commercial equine businesses. Much of the mitigation proposed throughout the report appears to depend upon future liaison, communication, advance warning or businesses adapting their own operations around the construction programme. That is not the same as demonstrating that impacts have been avoided. Measures described as being implemented "where practicable" or developed through future management plans provide limited reassurance to businesses that now stand acknowledged as amongst the most sensitive receptors within the study area.	if horses show distress, and vehicle speed and passing distance restrictions. To manage site specific operational arrangements, an independent equestrian expert within the Community Liaison Group will provide early advance notification prior to localised noisy events such as piling, allowing equine facility operators to coordinate daily routines while giving the Community Liaison Manager direct authority to investigate complaints and mandate additional constraints or noise monitoring. Furthermore, the Applicant stresses that all mitigation commitments set out across the Environmental Statement and **Equine Business Report [REP5-105]** represent duties secured by Requirements in Schedule 2 to the **Draft DCO [REP6-005]** The **Outline Construction Environmental Management Plan [REP6-029]**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				(Requirement 13), **Outline Construction Traffic Management Plan [REP6-041]** (Requirement 15), **Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104]** (Requirement 16), **Outline Landscape and Ecological Management Plan [REP6-037]** (Requirement 7), and Community Liaison Group Terms of Reference (Requirement 4) establish controls that must be formally submitted to and approved by Wiltshire Council prior to commencement. Once approved, adherence to these management plans is a statutory requirement under the Planning Act 2008, and 'where practicable' provisions provide necessary operational flexibility to adjust measures rather than diluting secured mitigation standards.
JF-012	Socio-Economics,	Construction Impacts on	I disagree with the suggestion that impacts are unlikely to affect viability	The Applicant recognises that commercial Thoroughbred breeding and stud operations represent sensitive

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Tourism and Recreation	Business Viability	simply because construction is temporary. Commercial Thoroughbred businesses operate around fixed biological and commercial cycles which cannot simply be rescheduled. Temporary disruption during foaling, breeding, veterinary treatment or sales preparation may have permanent commercial consequences. Likewise, business decisions are frequently made in anticipation of perceived future risks. Loss of client confidence, reduced investment and relocation of horses may occur well before construction has commenced and may not be reversed once construction has finished. Referring to these impacts as "short-term disruption" fundamentally misunderstands the nature of a commercial Thoroughbred breeding	receptors that function within biological and commercial cycles, including foaling, broodmare management, youngstock rearing, veterinary care, farriery, and sales preparation. Because construction activities across the Scheme are phased, localised, and progressive rather than continuous at any single location, individual facilities will not experience ongoing disturbance throughout the full construction period, and time limited windows would be communicated via the Community Liaison Group (CLG). The Applicant has embedded physical design standoffs that avoid undertaking construction works directly adjacent to sensitive breeding and foaling areas, alongside temporary acoustic screening where works take place in close proximity of equestrian facilities, ensuring that acoustic and visual noise

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			enterprise. Temporary disruption during critical periods such as breeding, foaling, veterinary treatment or yearling preparation may have permanent welfare and commercial consequences. This terminology therefore reinforces our concern that the Applicant continues to underestimate the practical realities of operating an internationally connected breeding business immediately adjacent to the Scheme.	is suppressed directly at source to protect daily routines.
JF-013	Socio-Economics, Tourism and Recreation Landscape and Visual	Operational Phase	I remain unconvinced that the Applicant has demonstrated that the operational phase would not significantly affect adjacent commercial Thoroughbred breeding enterprises. The Applicant places considerable reliance upon landscape buffers and screening yet provides little consideration of the 15 year establishment period before these measures may become effective. In practice, meaningful screening may take many years to develop, during which the	The Applicant maintains that in regard Equine facilities, distance is a factor in determining potential operational and construction effects, with locations over 500 metres from works areas experiencing minimal to no impact. At distances of 100 metres, which is beyond an equine flight zone, horses may remain observant or vigilant, but physical separation prevents threat perception. Furthermore, single axis tracking panels (SATs) up rotate slowly and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			operational infrastructure will remain largely exposed. In addition, the Applicant continues to conclude that the slow movement of tracker panels is unlikely to result in significant effects, despite providing little or no equine-specific empirical evidence to support this conclusion. There remains no convincing real-world evidence demonstrating that commercial Thoroughbred breeding enterprises can successfully operate immediately adjacent to extensive 4.5m high moving solar arrays.	incrementally by approximately 15 to 20 degrees per hour throughout the day, generating only low level motor noise without sudden or erratic movements. Because tracking panel rotation is gradual and predictable, horses in adjacent paddocks habituate rapidly without experiencing aversive stimuli or distress. Regarding screening and seasonal mitigation, the Applicant clarifies that reliance is not placed solely on newly planted landscape screening as it matures over time. The Scheme incorporates substantial embedded physical setbacks, maintaining solar infrastructure at least 15 metres from boundaries and public routes, alongside existing mature hedgerows and visual barriers that provide immediate physical separation from operational arrays.
JF-014	Noise and Vibration	Operational Phase	Similarly, insufficient consideration has been given to operational noise sources, including tracker motors, maintenance	The primary operational noise sources, detailed in **ES Volume 3, Appendix 14-4 Noise Modelling [REP5-063]**, have

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			activities and wind interaction with panels. Evidence presented from Cleve Hill demonstrates that operational noise from solar infrastructure is capable of generating concern, even with smaller panels than those proposed at Lime Down. The Applicant has not adequately demonstrated why similar issues would not arise here.	been incorporated within a robust, reasonably worst-case assessment, including receptor being downwind of noise sources. Paragraph 14.4.17 of **ES Volume 1, Chapter 14 Noise and Vibration [REP5-024]** explains the very low levels of noise expected from a tracking motor and, as explained in the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**, noise from multiple tracker panels would be comfortably below existing ambient sound levels and therefore would not have a noticeable impact of horses or their riders. As clarified in paragraph 14.10.61 of **ES Volume 1, Chapter 14 Noise and Vibration [REP5-024]**, maintenance activities will be less noisy than those during construction from which no significant effects are predicted.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JF-015	Socio-Economics, Tourism and Recreation	Temporary Construction Impacts	The Applicant repeatedly refers to construction effects as "temporary" or "short-term disruption". In my opinion this fundamentally misunderstands the way commercial Thoroughbred breeding businesses operate. Breeding, foaling, veterinary procedures, yearling preparation and sales programmes all occur within fixed biological and commercial windows. Temporary disruption during those periods may have permanent welfare and commercial consequences. Similarly, business decisions are often made in anticipation of future risk rather than after an incident has occurred. Clients do not necessarily wait until a horse has been injured before deciding to relocate valuable bloodstock. Loss of confidence, reduced investment and relocation of horses may occur long	The Applicant refers to response **JF-012** and reiterates that the **Equine Business Report [REP5-105]** accounts for these operational sensitivities and does not rely on the temporary duration of construction in isolation. Regarding client confidence, perceived future risks, and bloodstock relocation, the Applicant has factored commercial reputation and owner perception directly into the viability assessment, which demonstrates that a sustained reduction in trade or client demand would be required to affect business viability materially. Because physical standoffs, noise suppression, and traffic controls prevent high level or sudden environmental disturbance, daily operational routines and horse welfare remain protected. Supported by advance notification and ongoing engagement through an

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			before construction begins and may not be reversed when construction eventually finishes.	independent equestrian expert appointed to the **Community Liaison Group (CLG)**, these secured measures provide full clarity and reassurance to facility operators and owners, preserving commercial confidence and business continuity.
JF-016	Socio-Economics, Tourism and Recreation	Equine Business Report	Throughout the report there is a tendency to acknowledge potential impacts before concluding that significant effects are unlikely without adequately demonstrating why that conclusion is justified for the businesses concerned. I also remain concerned regarding the transparency of the consultation methodology. It remains unclear precisely which equine businesses received questionnaires, how they were selected, how many responses were received, and the extent to which the conclusions presented are supported by the available evidence. We are	The Applicant clarifies that the conclusion of no significant adverse effects on equine business viability is founded upon a comprehensive assessment combining specialist veterinary expertise on horse welfare with socio economic evaluation of business operating models. Potential impact pathways such as noise, dust, traffic, and visual alterations are directly controlled at source by binding mitigation measures secured under Requirements 7, 13, 15, and 16 in Schedule 2 to the **Draft DCO [REP6-005],** the **Outline Construction Environmental Management Plan [REP6-029], Outline Construction**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			continuing to review this and hope to provide further comments separately. Throughout the report, the Applicant frequently assesses whether horses may eventually habituate to the proposed environment. However, this is not the same question as whether a professional breeding enterprise can continue to recommend that environment to its clients with confidence. Business viability depends upon maintaining both welfare standards and professional confidence. The report does not adequately bridge that gap.	**Traffic Management Plan [REP6-041], Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104], Outline Landscape and Ecological Management Plan [REP6-037].** Regarding survey transparency, equestrian facilities within the 5km study area were identified through statutory consultation responses, site visits along public routes, written representations, and a desk based review of public records, websites, directories, and Companies House filings. A wider 20 km postcode based study area, comprising postcodes GL8, GL9, SN14, SN15, and SN16, was established to evaluate supporting supply chain industries and mobile contractors. Primary data was gathered by distributing a questionnaire survey to approximately thirty local equestrian businesses to understand operational

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				scale, employment, and supply chain interdependencies, with survey evidence integrated alongside written representations, hearing evidence, case study reviews, and expert veterinary analysis to form a robust baseline while protecting commercially sensitive financial data. Subsequently, the **Equine Business Report [REP5-105]** assessment identifies potential impacts on businesses and considers these in the context of the nature, scale and duration of the impacts, the characteristics and sensitivity of the receptors affected, and the measures proposed to avoid, reduce or manage those impacts. Where reference has been made to habituation, this is to demonstrate that the mitigation measures in place to limit environmental effects such as noise or movement from construction activities, are sufficient to ensure that horses in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				neighbouring facilities are not anticipated to experience impacts that would have a substantial effect on their wellbeing. Therefore, the Applicant understands that this is sufficient to give business owners the confidence to be able to support their clients.
JF-017	Socio-Economics, Tourism and Recreation	Equine Business Report	The lack of inclusion of local businesses is evident from the map of equestrian properties and businesses submitted at Deadline 4 alongside the Equine setting report. It is very difficult to understand the methodology the applicant has used to identify the recipients of this questionnaire. A few initial examples of affected equine businesses not included who are existing IP's include: Andrew Privas – Existing IP [REDACTED] who spoke to himself during the Accompanied Site Visit about the Questionnaire never received a copy. He is a local farrier whose business will be heavily impacted.	The Applicant refers to response to JF-016 and wishes to add further clarification notes that certain businesses, including mobile farriers, saddlers, and independent service providers, may not have received direct site questionnaires or appeared on initial facility mapping because they operate as mobile micro contractors without fixed physical yard facilities within the 5 km boundary, or maintain registered commercial or residential addresses in urban centres or wider postcode areas. Such enterprises are captured within the wider 20 km supply chain analysis rather than mapped as direct land based equestrian receptors.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			[REDACTED] – Existing IP with a busy local livery yard in Luckington who did not receive the Questionnaire. Grant Barnes and Son - long established saddlers based in the centre of Malmesbury and heavily used by local equine businesses. The Applicant appears to have included a saddler near to Melksham yet fail to include this very locally based and much more likely affected business. Very few properties marked on the map submitted at Deadline 4 have received this Questionnaire. It appears businesses along the cable route (as opposed to sites) have been included who are less likely to be aware of the scale and impact. Perhaps it would be useful for the Applicant to plot the businesses which received their	The Applicant furthermore confirms that private equestrian facilities not associated with business activities were not sent questionnaires as this was considered to fall outside the scope of the **Equine Business Report [REP5-105]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			questionnaire on a map similar to the one submitted at Deadline 4. *Applicant: "For an equestrian business to become economically unviable during the construction phase, there would need to be a sustained reduction in demand from both existing and prospective clients. This could potentially arise where construction-related activities influence customer perceptions, reduce the attractiveness of facilities or otherwise discourage participation in equestrian activities over a prolonged period."* As professionals entrusted with the care and management of high-value Thoroughbreds, our primary responsibility is to provide an environment that we believe is safe, suitable and conducive to the welfare and performance of the horses in our care. Our clients rely upon our professional judgement when deciding	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			where to place valuable broodmares, foals and youngstock. The issue is therefore not simply one of client perception or confidence in our business, it is also our own professional confidence that we are able to continue providing the standard of environment and care that we have promised. If we are no longer confident that this can be achieved because of the proximity and duration of major construction works, it would inevitably influence both our business decisions and those of our clients. The Applicant significantly underestimates the importance of this professional judgement and its direct relationship to business viability.	

Table 6-4 January Farrington – Appendix 1: Veterinary Response to the Equine Business Report [REP6-085]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JFAP1-001	Scheme Description and DCO Process	Introduction	I qualified as a veterinary surgeon in 2009 and have worked exclusively in Thoroughbred veterinary practice since qualification. For the past 11 years, I have worked exclusively within a large, commercial, industry-leading Thoroughbred stud farm. My professional experience includes the day-to-day veterinary management of Thoroughbred broodmares, foals, weanlings and yearlings, including reproductive and neonatal medicine, nutrition, routine and emergency veterinary procedures, youngstock management, and the behavioural and practical considerations associated with handling Thoroughbreds within a commercial stud-farm environment. My qualifications are BA (Mod) Biochemistry, Graduate Diploma in Business Studies (DBS), MVB and Graduate Certificate in Equine Sports Medicine (UCD). I have reviewed the	The Applicant notes the professional experience cited and clarifies that population level habituation is not required for mitigation to be effective, particularly given that Thoroughbred breeding facilities manage a constantly turning over population of stock. Because construction activities for the installation of the Solar PV Arrays are temporary in duration, only a proportion of a facility's total annual horse turnover will be present or exposed during active construction works. While individual equines exhibit varying levels of reactivity to novel situations, behavioural and physiological responses across horses follow consistent biological mechanisms. Construction machinery operating at established standoff distances, combined with the availability of open pasture allowing horses to utilise aversive positioning by moving to the opposite side of a field, ensures that animals do not experience negative impacts or harmful associations.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Equine Business Report (EXAM/9.62) from the perspective of my professional veterinary experience within the Thoroughbred breeding industry and with reference to the scientific literature relevant to equine behaviour, physiology, nutrition and welfare. The report does not need to be challenged on the general proposition that horses can habituate. The central concern is that this general biological capacity is relied upon too heavily to support conclusions of low residual risk in a continuously exposed population of high-value Thoroughbred broodmares, foals, yearlings and newly arriving bloodstock. Population-level habituation does not establish safe adaptation in every individual, does not prevent catastrophic injury during early exposure, and does not address physiological or commercial	The Applicant notes that there is no empirical evidence indicating that solar panel infrastructure or Battery Energy Storage Systems negatively affect equine fertility, which serves as a key indicator that overall equine health and reproductive physiological function remain uncompromised.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			consequences where normal behaviour such as foraging is materially altered.	
JFAP1-002	Socio-Economics, Tourism and Recreation	Equine Business Report	1. Habituation evidence is over-extrapolated **Report weakness** The report relies heavily on rapid habituation to justify low residual risk. However, Janicka et al. (2024) studied only 20 Warmblood horses used for hippotherapy and recreational riding, exposed repeatedly to selected recorded sounds under controlled conditions. The paper describes habituation to a "specific stimulus", reports marked individual variation in the number of exposures required, and found renewed vigilance, locomotion and heart-rate responses to novel sounds. A population selected and managed for therapy/recreational work is not a representative population of Thoroughbred broodmares, foals and yearlings, and repeated playback of a defined sound	The Applicant notes the comments regarding scientific literature on equine habituation, including Janicka et al. (2024), Klitzing et al. (2025), and Henke von der Malsburg and König von Borstel (2026). The Applicant clarifies that habituation is a well-established biological learning mechanism supported by an extensive body of equine research. The Applicant agrees with the principle that if a horse undergoes a frightening event or harmful experience that creates a negative association with a stimulus, the animal can become sensitised rather than habituated. However, sensitisation requires a perceived threat or adverse consequence. Where construction activities take place at established setback distances from paddocks, horses are able to perceive from a distance that the activity presents no threat. Because the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			is not equivalent to an evolving construction site. **Veterinary objection** Construction presents changing and combined stimuli - machinery, HGVs, people, reversing alarms, impact noise, visual movement, vibration and activity from different positions. Habituation to one stimulus cannot safely be assumed to generalise to the next. Repetition may also reinforce an adverse association after a sufficiently frightening event rather than progressively improve the response. **Evidence** Evidence: Janicka et al. 2024, Journal of Veterinary Behavior 74:11-18. The authors conclude: "Horses distinguish familiar sounds from novel sounds." Recent young-Thoroughbred work also found substantial individual and environmental-context effects (Klitzing et al., 2025).	animals are not chased, cornered, or physically harmed, no negative association is created, allowing horses to observe the activity without developing fear or chronic physiological stress. Furthermore, when turned out in paddocks, horses naturally employ aversive positioning by moving to the boundary opposite active construction, thereby increasing their physical distance from the work face and maintaining separation well beyond their flight zone. This self-managed retreat space prevents construction activities from penetrating the horse's flight zone or being perceived as an immediate threat. To ensure that unexpected or high level disturbances do not trigger frightening events, The Applicant has committed to legally binding safeguards, notably the various management plans, secured under Schedule 2 to the **Draft DCO [REP6-005]** including temporary acoustic and visual screening when works occur within 30 metres of fields, alongside mandatory stopping work protocols requiring operatives to cease noise generating work immediately if horses exhibit

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				distress. Through these combined physical standoffs, natural pasture retreat zones, and secured operational controls, The Applicant ensures that negative associations are avoided, preventing sensitisation and fully protecting equine welfare across all facility types.
JFAP1-003	Socio-Economics, Tourism and Recreation	Equine Business Report	2. Individual Thoroughbred reactivity and the catastrophic-outlier problem **Report weakness** The assessment relies too heavily on the response of the "average horse". In stud practice there is a wide spectrum of neuro-/sensory reactivity: some horses are exceptionally sensitive to sound, touch, confinement, handling or unexpected movement. Thoroughbred-specific studies support meaningful individual variation in behavioural traits, and genetic work supports a biological contribution to temperament. **Veterinary objection** For this risk, the outlier matters. It takes only one unpredictable startle	The Applicant notes that individual variation in behaviour, reactivity, and sensitivity occurs across all equines rather than being unique to thoroughbreds or stud operations, as all horses share the same fundamental physiological fight or flight mechanisms when perceiving potential threats. While baseline reactivity can vary based on temperament and individual experience, equines possess high trainability and neuroplasticity that enable them to adapt and habituate rapidly when a stimulus carries no negative consequences. When a novel stimulus directly penetrates a horse's flight zone, which typically extends between five and thirty metres depending on temperament, an immediate evasive flight reaction occurs.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			response for a yearling to run through a fence, collide with a gate or handler, escape, or sustain a catastrophic limb injury. Eventual habituation is irrelevant to an animal catastrophically injured during its first exposure. The assessment must therefore consider severity as well as probability. **Evidence** Evidence: Powell et al. (2023) state that an inappropriate startle response can "cause serious injury to the animal or human handlers." Yokomori et al. (2024) identified genetic associations with personality traits in 169 Thoroughbreds. Klitzing et al. (2025) concluded that "it is important to consider the individual behavior of each horse."	Conversely, at distances beyond the flight zone or where physical buffers exist, horses exhibit visual observation, pricked ears, and heightened vigilance rather than spooking or blind panic. Furthermore, a flight response does not signify uncontrollable panic or fence breaching; rather, horses naturally employ aversive positioning by moving to the opposite boundary of a paddock to increase physical separation from the activity until they can safely monitor and evaluate the stimulus.
JFAP1-004	Socio-Economics, Tourism and Recreation	Equine Business Report	3. Youngstock, maternal families and newly arriving horses remain vulnerable **Report weakness** The report's reliance on neuroplasticity in young horses does	The Applicant observes that while temperament, personality, and sensory sensitivity possess underlying genetic traits, younger stock and foals display an enhanced capacity for rapid learning and habituation compared to mature horses.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			not establish that foals and yearlings are at no greater practical risk. Youngstock are naive and may react intensely before learning occurs. West Park also has a continuously changing bloodstock population, so newly arriving animals will repeatedly enter without prior habituation. **Veterinary objection** Long-term stud experience is additionally relevant expert evidence: temperament and reactivity can recur strongly within maternal families. Similar characteristics may remain apparent even in foals subsequently reared by foster mares. This clinical observation should be distinguished from the published evidence, but it is consistent with modern evidence of a genetic contribution to Thoroughbred temperament. **Evidence** Evidence: Yokomori et al. (2024), Thoroughbred personality/genetic associations; Powell et al. (2023),	Due to a high rate of brain development and natural curiosity, foals exhibit significant neuroplasticity, enabling them to process novel environmental stimuli, complete associative learning tasks, and habituate within fewer repetitions than adult horses. Consequently, the presence of foals and youngstock within breeding facilities does not increase overall vulnerability to environmental changes, as their neurobiological plasticity facilitates prompt adaptation to non-threatening acoustic and visual background activities.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			measurable individual startle phenotypes in weanlings; Klitzing et al. (2025), individual and environmental effects in young Thoroughbreds.	
JFAP1-005	Socio-Economics, Tourism and Recreation	Equine Business Report	4. Reduced foraging: broodmare nutrition, colostrum, foal growth and commercial consequences **Report weakness** The report underweights reduced foraging as though it were principally a transient behavioural response. In the 2026 experimental traffic-noise study, median foraging fell from 81% at baseline to 41% during initial noise exposure, while vigilance and heart rate increased; avoidance and physiological arousal persisted despite partial behavioural habituation. **Veterinary objection** On a Thoroughbred stud, a substantial or recurrent reduction in normal feeding has potentially serious downstream consequences. Late-pregnant and lactating mares have	The Applicant recognises that pregnant and lactating broodmares experience higher physiological and nutritional demands during foaling, lactation, and early youngstock rearing. However, as evaluated within the **Equine Business Report [REP5-105]** and in response to submissions regarding stud farm management, maintaining adequate nutritional intake and grazing routines is not compromised where pastures provide sufficient quiet retreat zones. Because horses naturally display aversive positioning when turned out, moving to the boundary of a paddock opposite active construction or visual stimuli, they effectively create their own physical separation and quiet retreat space well outside their flight zone. This natural behavioural adaptation allows broodmares and foals to graze calmly, maintain normal feeding patterns, and satisfy their physiological requirements without experiencing chronic stress

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			high nutritional requirements; inadequate intake can compromise maintenance of optimal body condition and nutrient supply. Maternal nutrition is relevant to colostrum quality, including vitamin E status and colostral immunoglobulin concentrations, while adequate colostrum is essential to passive transfer in the foal. Reduced intake also raises concerns for milk production, foal growth, youngstock condition, veterinary intervention and eventual sales value and athletic potential. The report should therefore assess the complete biological and commercial pathway rather than treating reduced foraging as a minor behavioural effect. **Evidence** Henke-von der Malsburg & König von Borstel (2026) reported a fall in median foraging from 81% to 41% during initial noise exposure. Bondo & Jensen (2011) reported that late-	or nutritional deficits. The cited report is also referred to in response to JFAP1-006.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			gestation vitamin E supplementation increased alpha-tocopherol in mare milk and affected milk IgG/IgM concentrations. Thoroughbred growth literature demonstrates the commercial and developmental importance of appropriate foal and youngstock growth. This evidence supports a credible risk pathway; it does not prove that this Scheme will necessarily cause failure of passive transfer.	
JFAP1-006	Socio-Economics, Tourism and Recreation	Equine Business Report	7. Gastric-health consequences of reduced forage/stress warrant consideration **Report weakness** Thoroughbreds are a population in which equine gastric ulcer disease is clinically important. The strongest argument is not a simplistic stress cortisol-ulcer chain, but the interaction of altered normal feeding behaviour with gastric physiology. Horses are adapted to frequent forage intake; prolonged or recurrent reductions in forage alter	The Applicant notes the reference to le Jeune et al. (2009) regarding the high prevalence of gastric ulceration in racehorses, standing at 86 percent due to feeding and racing regimes, alongside a high prevalence in Thoroughbred broodmares at pasture. The Applicant observes that baseline health factors and management regimes contribute to background physiological conditions in Thoroughbred stock. Regarding the study by Henke von der Malsburg and König von Borstel (2026), The Applicant clarifies that the research

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			salivary buffering and increase acid exposure of the squamous stomach. **Veterinary objection** Accordingly, where environmental noise has experimentally produced a large reduction in foraging, gastric health is a legitimate physiological endpoint for a Thoroughbred-specific assessment. Any assertion that this particular construction will cause ulcers would be too strong; the weakness is that the pathway is not adequately considered. **Evidence** Evidence: established EGUS literature identifies feeding management, periods without forage and high-concentrate/low-forage management among important risk factors. The 2026 noise study provides the missing behavioural link by directly demonstrating reduced foraging during noise exposure.	evaluated continuous traffic noise equivalent to 10 metres from a four lane motorway played for up to 11 hours per day. The Scheme exceeds these physical separation distances, and such continuous noise levels played for 11 hours daily would not be typical of construction activities in any location in close proximity to stud farms. Furthermore, The Applicant highlights that the Henke von der Malsburg study demonstrates that horses display increased vigilance upon initial noise exposure and naturally respond by moving away to avoid the acoustic source. The paper concludes that noise could become a welfare issue only if sustained over a prolonged period. Because construction activities across the Scheme are localised, progressive, and short term in any given location, and because horses naturally utilise aversive positioning by moving to the opposite boundary of a paddock, animals are not subjected to prolonged or continuous noise

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				exposure, ensuring that equine health and welfare remain fully protected.
JFAP1-007	Socio-Economics, Tourism and Recreation	Equine Business Report	8. The 30 m flight-zone argument is not a validated construction safety threshold **Report weakness** The report appears to convert a handling concept - the horse's flight zone - into a general prediction that construction movement beyond about 30 m will not elicit a material response. A flight zone is not an acoustic, vibration or visual detection threshold. **Veterinary objection** Horses can perceive and react to noise, machinery, flashing lights and movement far beyond a handling flight distance. No cited evidence validates 30 m as a safe construction separation for Thoroughbreds, particularly when parts of West Park are recorded at 0 m and 50 m from works. **Evidence**	The Applicant clarifies that an equine flight zone represents the immediate spatial boundary within which a horse perceives an active threat to its safety. While published literature does not explicitly define standardised construction separation distances for equines, understanding equine physiology and behaviour is fundamental to evaluating how horses react to perceived threats. Established principles of equine behavioural science confirm that physical distance is directly related to impact severity, whereby greater separation from a potential stimulus significantly reduces threat perception, limits physiological arousal, and prevents flight reactions. A published report (Birke et al (2011) (Appendix B of the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 8 and Responses to Action Points [EN010168/EXAM/9.83])** provides empirical

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Evidence: the 2026 traffic-noise study demonstrated equine behavioural and physiological effects at exposures modelled over distances far beyond 30 m. It does not establish a construction threshold; it demonstrates why a 30 m handling concept cannot serve as one.	literature that confirms that a 30 metre range represents a generous upper threshold when compared to studied flight initiation distances across equines. Further research by Masuda et al (2008) (Appendix C of the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 8 and Responses to Action Points [EN010168/EXAM/9.83]**) on semi feral horses approached by unfamiliar humans identified a mean flight avoidance distance of between 2.32 and 6.87 metres, with initial flight responses generally triggered at 2.5 metres. At distances beyond 30 metres, or where physical buffers exist, novel visual or acoustic stimuli trigger visual observation, pricked ears, and heightened vigilance rather than blind panic or fleeing. A flight response does not signify uncontrollable panic or fence breaching, as horses turned out in paddocks naturally employ aversive positioning by moving to the boundary opposite active construction to increase physical separation until they can safely evaluate the stimulus.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant has submitted further details and literature regarding flight zones within the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 8 and Responses to Action Points [EN010168/EXAM/9.83]** The Applicant also confirms through the plan of separation distances to the boundary of West Park Farm, included at Appendix F of **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 8 and Responses to Action Points [EN010168/EXAM/9.83]**, the separation distances between construction works and paddock boundaries at West Park Farm. The plan confirms that no construction works for the Solar PV Array in field D14 are located within 47.8 m of the 'triangular' central paddocks at West Park Farm, or in field D13 within 91 m of the 'square' western paddock. The Applicant confirms that it understands that horses are likely to be aware and may move themselves away from these activities but without

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				perceiving this as an immediate threat that would initiate a startle or flight response. Any works within closer distances than those referenced, including up to the shared boundary on the south of the square paddock are solely vegetation and groundcover planting works to facilitate landscape screening and ecological enhancements, and are therefore anticipated to be consistent with existing agricultural activities.
JFAP1-008	Socio-Economics, Tourism and Recreation	Equine Business Report	9. Safe handling concerns apply to vets and stud staff, not only farriers **Report weakness** The report recognises the need for calm conditions during farriery but does not adequately extend the same risk analysis to veterinary procedures, routine stud work and even very simple close handling of horses in fields or paddocks. **Veterinary objection** The risk is not confined to formal procedures. Stud staff and veterinarians routinely have to enter a	The Applicant observes that many specialist veterinary procedures, farriery tasks, and handling routines associated with Thoroughbred stud operations can take place within indoor or enclosed barn facilities rather than in outdoor pastures directly adjacent to active construction faces. Furthermore, given the temporary and progressive nature of construction activities across localised work areas, stud farm operators retain operational flexibility to utilise alternative fields, indoor yards, or sheltered paddocks away from active work boundaries during short

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			horse's immediate personal space to fit or adjust a headcollar, attach a lead rope, check a limb or wound, take a temperature, administer medication, examine a foal, scan a mare, give an injection, take blood, apply a bandage or simply catch and move a horse. At those moments the handler may be beside the head, shoulder or hindquarters with limited ability to evade a sudden movement. An unexpected construction noise, movement or vibration at precisely the wrong moment can produce a rapid startle, spin, strike, kick or collision and expose the handler to serious injury. This is especially relevant when horses are loose at pasture and cannot be managed within a controlled clinical environment. Advance warning cannot eliminate this risk because many routine interactions are unavoidable and emergencies are inherently unpredictable.	construction periods, which would be clearly communicated in advance and allow for communication to be provided to construction contractors in return. I.e. When emergency veterinary care is required. The Applicant notes that managed equines are routinely exposed to transient, unannounced background noises inherent to normal rural and agricultural working environments, including operating tractors, banging trailers, unexpected loud sounds, and thunder. Because horses are naturally accustomed to experiencing occasional sudden acoustic events in daily yard operations without suffering adverse welfare impacts, temporary construction sound profiles do not present an unfamiliar acoustic environment, ensuring that equine health, safety, and daily welfare remain fully protected. Secured mitigation measures incorporated into the Scheme are cited within Table 3 of the **Equine Business Report [REP5-105]**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Evidence Powell et al. (2023) expressly notes that an inappropriately expressed equine startle response can cause serious injury to the animal or human handlers. The relevance therefore extends beyond farriery to all close-contact husbandry, veterinary and handling activities carried out within the stud environment.	
JFAP1-009	Socio-Economics, Tourism and Recreation	Equine Business Report	10. Mitigation is uncertain and transfers burden to the stud **Report weakness** The proposed controls rely heavily on advance warning, altered routines, increased staff vigilance and wording such as "where practicable". The report should distinguish mandatory secured controls from measures that may not occur when inconvenient or impracticable. **Veterinary objection** It should also specify equine-awareness training for all relevant	The Applicant refers to response to JF-011 and maintains that potential impact pathways such as noise, dust, traffic, and visual alterations are directly controlled at source by binding mitigation measures secured under Requirements 7, 13, 15, and 16 in Schedule 2 to the **Draft DCO [REP6-057], The Outline Construction Environmental Management Plan [REP6-028, Outline Construction Traffic Management Plan [REP6-029], Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104], Outline Landscape and Ecological Management Plan [REP6-037]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			contractors, subcontractors, plant operators and delivery drivers; prohibited behaviours; supervision; and whether the stud can require work to stop before a high-risk procedure or horse movement. Additional supervision, altered turnout, horse relocation and rescheduling are themselves costs and operational impacts. **Evidence** This is principally a risk-management and business-impact objection, supported by the startle/safety literature rather than by a specific construction-worker study.	Under these secured management plans, all site personnel, contractors, subcontractors, plant operators, and delivery drivers will receive site inductions and equine awareness training covering horse behaviour, sensitivity to noise and sudden movements, prohibited driver actions, and procedures for meeting equestrians or loose horses. Furthermore, construction workers conducting noise generating activities near equestrian facilities are briefed on mandatory stopping work protocols requiring work to cease immediately if horses appear in distress or in danger, while site managers and the Community Liaison Manager possess direct authority to investigate complaints and mandate additional constraints or noise monitoring. The Applicant notes that advance notification provided via the independent equestrian expert appointed to the Community Liaison Group and secured under the Stakeholder Communications Plan is designed to provide facility operators with clear foresight, enabling daily yard routines and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				time critical procedures to be managed smoothly alongside short term construction activities. This engagement framework is not intended to force wholesale changes to stud farm operations or transfer unmitigated financial burdens onto local businesses, but rather to establish a responsive interface that coordinates working methods around sensitive operational periods such as breeding, foaling, veterinary care, farriery, and horse movements. References to implementing specific measures where practicable provide necessary operational flexibility to adapt controls under local authority oversight without diluting mandatory standards or shifting responsibility to facility owners.
JFAP1-010	Socio-Economics, Tourism and Recreation	Equine Business Report	11. The other solar/equestrian case studies are not comparable with an adjacent Thoroughbred stud **Report weakness** The report relies on Sunnica, Membury, Lower Thames Crossing and Wallaroo as contextual reassurance. Those examples are not	The Applicant notes that foals are routinely turned out into paddocks with their mothers from approximately four to seven days of age, where the mare provides a calming influence as the foal experiences external environmental stimuli. Many routine veterinary procedures, farriery tasks, and handling activities take place indoors within stud farm buildings, where horses are shielded from visual triggers outside. Furthermore, horses are

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			equivalent in exposure or receptor type. Lower Thames Crossing concerned a riding school where lesson times could be altered; Wallaroo concerned a riding centre located less than 2 km from the proposed development; and the Lime Down report itself acknowledges that Membury had no specific horse-industry impact assessment at planning stage. Exercise gallops, bridleways, riding lessons and general equestrian routes are transient or actively controlled uses. They do not reproduce continuous exposure of broodmares, foals and yearlings living immediately beside construction. **Veterinary / evidential objection** A broodmare unit cannot reschedule foaling, lactation, turnout, spontaneous field behaviour, neonatal care or emergency veterinary procedures. Yearlings and foals loose in paddocks are not analogous to ridden horses passing along a route	unlikely to be startled by acoustic stimuli unless the sound is very loud, sudden, and generated in close proximity or directly within their flight zone. Repetitive noise profiles arising from construction activities do not present an ongoing threat, allowing horses to habituate rapidly and observe activities from a distance without experiencing chronic stress. The Applicant agrees that turned out horses in pasture fields are not directly analogous to horses being ridden or worked under saddle, as turned out horses retain greater freedom to move away from novel stimuli. Nevertheless, the underlying physiological processing and startle responses remain consistent across equines, resulting in predictable behavioural mechanisms. As demonstrated in the case study review of the Sunnica Energy Farm project near Newmarket in Annex B of the **Equine Business Report [REP5-105]**, a comprehensive assessment of the Horse Racing Industry concluded that potential impacts on equine operations, health, and commercial viability can be effectively managed through

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			under human control. These comparator schemes therefore provide little empirical evidence that an adjacent Thoroughbred breeding unit will be unaffected. **Sunnica - the most relevant comparator** Sunnica is the exception because its examination did include genuine breeding-stud receptors. That makes the way it is presented especially important. The Lime Down summary concentrates on gallops, exercise/training routes, traffic management, timing and screening, but does not reflect highly relevant Sunnica examination evidence concerning Brookside Stud and other studs. That evidence described the proposed BESS as almost adjacent to Brookside Stud and raised concerns involving broodmares and young foals, bolting and injury, loss of usable paddocks and business effects. In other words, the most comparable element of the case-study record	structured mitigation, management plans, and early engagement. The Secretary of State agreed with the assessment methodology in that case, confirming that appropriate controls prevent significant lasting adverse effects on the equine sector.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			raised substantially the same stud-specific concerns now raised at West Park. **Conclusion** The case studies cannot properly be used as a collective demonstration that equine impacts are manageable. Most do not involve an adjacent commercial breeding stud at all; the one that does contain genuinely comparable stud evidence is materially less reassuring than the Lime Down summary suggests.	
JFAP1-011	Socio-Economics, Tourism and Recreation	Equine Business Report	12. Business viability, client confidence and bloodstock insurance remain insufficiently assessed **Report weakness** The report acknowledges differences in equine hearing yet relies substantially on human/residential environmental assessment. It also concludes that significant business effects are unlikely without modelling the individual financial resilience of West Park. **Veterinary objection**	The Applicant clarifies that while equines possess distinct auditory ranges compared to humans, the use of established environmental noise assessment criteria provides an accepted proxy benchmark. This approach aligns with accepted precedents established in other Development Consent Order examinations, including Sunnica Energy Farm, where the Secretary of State agreed that human noise thresholds serve as an appropriate

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			A Thoroughbred-specific commercial assessment should include client confidence, loss or alteration of paddock use, additional staffing, horse throughput, sales preparation and value, and bloodstock insurance. Major construction immediately adjacent to premises housing high-value bloodstock is a potential underwriting consideration that should form part of the commercial assessment, including any implications for notification requirements, policy terms, premiums, deductibles, exclusions or insurability. **Evidence** The report does not appear to address this potential insurance and insurability consequence. It should therefore be treated as an additional commercial risk pathway requiring assessment alongside the other identified effects on the operation of the stud.	benchmark for evaluating potential acoustic effects on horses. Regarding individual financial modelling, the **Equine Business Report [REP5-105]** evaluates the underlying operational models, commercial sensitivities, and potential impact pathways of thoroughbred breeding enterprises, including considerations surrounding client confidence, paddock use, sales preparation, and staffing. Rather than attempting to model confidential financial resilience or private commercial accounts for individual studs such as West Park Farm, the report focuses on whether environmental changes could cause sustained operational disruption capable of affecting business viability across the sector. Regarding bloodstock insurance and underwriting considerations, the Applicant notes that specific input regarding insurance policy terms, premiums, deductibles, or underwriting criteria cannot be provided, as individual insurance arrangements

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				are private commercial matters determined independently by bloodstock insurers. However, insurance risk pathways and potential underwriting liabilities stem directly from physical threats to equine health, safety, and welfare, such as startle responses or physical injury. Because the Scheme implements legally binding mitigation measures secured in Schedule 2 to the **Draft DCO [REP6-005],** and outlined in Table 3 of the **Equine Business Report [REP5-105],** physical risk factors that could influence insurance underwriting or client confidence would be mitigated.
JFAP1-012	Scheme Description and DCO Process	Conclusion	Overall Conclusion The Equine Business Report moves too readily from the general capacity of horses to habituate, and from case studies that are frequently not comparable with an adjacent Thoroughbred breeding operation, to a conclusion that significant adverse effects are unlikely. In my opinion, that progression is not adequately established by the evidence cited. The relevant population includes	The Applicant observes that all equines share the same underlying physiological fight or flight processing mechanisms when perceiving external stimuli, whereas individual behavioural responses vary depending on temperament, personality, and past experience. Equines display greater sensitivity and startle reactions to suddenly appearing, fast moving objects rather than distant or predictable activities. Incoming stock or continually arriving animals arriving at a facility are naturally unhabituated to any new

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			individually reactive horses, maiden mares, foals, yearlings and continually arriving non-habituated bloodstock. The relevant consequences extend beyond visible startle behaviour to catastrophic injury, altered foraging and physiological arousal, gastric health, broodmare and foal nutrition, safe veterinary and husbandry procedures, youngstock development, client confidence, sales value and potentially bloodstock insurance. For a high-value Thoroughbred stud, a single unpredictable adverse behavioural event may be sufficient to cause irreversible loss. Repeated lesser effects may also accumulate into substantial veterinary, welfare and commercial consequences. These issues require site-specific and Thoroughbred-specific assessment rather than reassurance based principally on studies of other equine populations, controlled stimuli or transient equestrian uses.	surroundings, regardless of whether construction activities are taking place. As a prey species, horses possess an evolutionary learning capacity that enables them to distinguish rapidly between genuine threats and benign environmental activity through habituation. The Applicant clarifies that the conclusion of no significant adverse effects on commercial Thoroughbred breeding operations or business viability does not rely solely on general assumptions of habituation or external case studies in isolation. The assessment presented in the **Equine Business Report [REP5-105]** adopts a multidisciplinary approach that combines specialist veterinary expertise on equine health, physiological stress, and sensory mechanics with socio economic evaluation of thoroughbred business operating models. The assessment explicitly recognises the unique sensitivities of commercial breeding facilities, including broodmares, foals, yearlings, and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				incoming stock, alongside specific risk pathways such as startle reactions, foraging, nutrition, handling safety, client confidence, and sales values. Rather than assuming unmitigated exposure, the Applicant demonstrates that potential adverse behavioural and physiological impacts are eliminated or controlled at source through site specific, legally binding mitigation measures secured under Requirements in Schedule 2 to the **Draft DCO [REP6-005]**. These secured controls include embedded physical design standoffs that avoid locating construction works directly adjacent to sensitive breeding and foaling facilities, temporary acoustic and visual screening where works take place within 30 metres of paddocks or yards, HGV speed restrictions, dust suppression, and mandatory stopping work protocols if horses exhibit distress. Furthermore, site specific operational coordination is secured through an independent equestrian expert appointed to the Community Liaison Group under Requirement 4

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				of Schedule 2 to the **Draft DCO [REP6-005]**, supported by advance notification under the Stakeholder Communications Plan. This enables stud farm managers to coordinate daily yard routines, veterinary visits, farriery, and pasture management around localised construction phases, ensuring that single unpredictable events are prevented, client and professional confidence is preserved, and the commercial viability of Thoroughbred breeding enterprises is fully protected throughout all project phases.

6.3.1 The matters raised in Appendix 2 to January Farrington's submission [REP6-085] are addressed in Tables 6-3 and 6-4 above and are therefore not reproduced separately.

6.4 John Oglesby

Table 6-5 John Oglesby – Deadline 6 Submission [REP6-086]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JO-001	Noise and Vibration	Breaches of Privacy Matters	Further to the submission by Sherston Parish Council dated 7th August 2026 regarding the Lime Down Solar Project, we should like to bring to the Examining Authority's attention that survey work on behalf of the applicant as far back as October 2023 was undertaken on our property without our permission, see attached picture. The act of trespass and potentially other breaches of privacy matters as a result of installing sound monitoring equipment in our garden without our permission was reported to Wiltshire police at the time, reference BCA-95383-23-5454-IR01. We would therefore ask the Examining Authority to seek clarification and evidence from the applicant that all necessary consents and licences were obtained from land owners and that all data protection and transparency rules were followed for all monitoring and surveying data the	The Applicant confirms that permission was sought and granted for all sound monitoring locations. Whilst the sound level meter was placed in the correct area for monitoring purposes, its placing which encroached into another landowner's ownership was a result of human error and apologises for any inconvenience caused. The Applicant confirms that the baseline noise monitoring data and the associated interpretation and analysis presented in **ES Volume 3, Appendix 14-3 Baseline Noise Survey [REP6-016]** remain entirely unchanged, and valid for the purposes of assessing the noise impacts of the Scheme. This is because sound meter LT1, which has been identified as the sound meter

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			applicant has submitted to the formal examination record. Further we ask that where the applicant can not evidence this, the associated data is removed from the examination record. 	at issue, was a proxy for two receptors and the relevant data for those receptors can be replaced with the next nearest sound meter, LT6, which is subject to very similar background sound levels. With respect to privacy concerns, the Applicant can confirm that none of the meters were set-up to record audio, only decibels.

6.5 Peter and Jane Boggis

Table 6-6 Peter and Jane Boggis – Deadline 6 Submission [REP6-088]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
PJB-001	Socio-Economics, Tourism and Recreation	Equine Business Report	We have struggled through this report and find it addresses very few of our concerns. Who will enforce all the measures that have been suggested?	Section 2 of the **Equine Business Report [REP5-105]** has sought to present an overview of the main themes arising from relevant representations and written responses submitted to the Examination to date in relation to potential impacts on equine facilities and businesses. The Applicant has sought to provide direct responses to Relevant Representations, Written Representations and Oral Submissions made by Interested Parties throughout the examination process. Where mitigation measures are secured through management plans by the Requirements in Schedule 2 of the **Draft DCO [REP6-005]**, compliance with each of those management plans will be a legal obligation of the Applicant or

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Undertaker. Therefore, failure to comply with those would be a criminal offence. Monitoring requirements for most of the management plans require information to be provided to Wiltshire Council, or any other respective authority to ensure their compliance. Finally, members of the public would be able to report concerns or where they believe management plans are not being adequately followed to the Community Liaison Manager (during construction, replacement works, or decommissioning) or the dedicated community contact point during operation. These people would be responsible for ensuring publicly raised concerns are directly addressed by the Applicant or Undertaker operating the Scheme. This public reporting provision is secured through the relevant management plans under Requirements

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				13, 14, and 20 of Schedule 2 of the **Draft DCO [REP6-005]**.
PJB-002	Socio-Economics, Tourism and Recreation	Equine Business Report	Is there a mechanism to sue the company if these measures are not adhered to?	As described in full in PJB-001, failure to comply with the DCO is a criminal offence. Enforcement action can be taken for breaches of the DCO under the Planning Act 2008 and Wiltshire Council will have a role in monitoring compliance with the requirements of the DCO throughout each phase of the Scheme. Any person that suspects non-compliance will be able to raise these concerns through the Community Liaison Forum directly, or can raise these with Wiltshire Council to investigate as part of their monitoring duties.
PJB-003	Socio-Economics, Tourism and Recreation	Equine Business Report	What practical knowledge do the assessors have of the equine industry, financially and more importantly practically dealing with, in our particular situation, highly tuned competition	The knowledge and competence of the Applicant's team involved in delivery of the **Equine Business Report [REP5-105]** is set out at Section 1.5 therein. This demonstrates that the team has a

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			horses worth hundreds of thousands of pounds which could easily, terminally injure themselves if spooked by noise or movement during construction and after completion, movement and noise from these unusually large panels and transformers. The whole Equine Business report, in our opinion, is no more than a smokescreen!	collective experience of equine welfare and understanding economic impacts, to which the report is directed.

6.6 Robert MacLachlan

Table 6-7 Robert MacLachlan – Deadline 6 Submission [REP6-089]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
RM-001	Scheme Description and DCO Process	Support for renewables	It seems that if we are to support renewables then this is a state of the art well planned project. I believe it should go ahead.	The Applicant notes this comment.

6.7 Vivienne Jane Clarke

Table 6-8 Vivienne Jane Clarke – Response to the Applicant's Deadline 5 Response to Submissions Received at Deadline 4 [REP6-090]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
VJC-001	Arboriculture	Commitments Made in Relation to Planting	For the reasons set out in detail below arising from the Applicant's failure properly to respond to points made in my Deadline 4 submission Please will the ExA review carefully and question the Applicant on the following: 1. The commitments to be made and secured in relation to the planting and subsequent maintenance of hedgerows, trees and shrubs which form such a key part of the Applicant's attempt to hide the panels they plan to instal. 2.Whether the commitments are adequate to ensure the best prospects of survival of new planting. 3. The source of water and method and frequency of its delivery for the maintenance of the new mitigation planting identified in the oLEMP. [REP3-100].	The Applicant notes this comment. The matters raised in Points 1 to 4 are addressed in detail in the responses to VJC-004 to VJC-008 below.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			4. If the planting does not survive how the assumptions about screening and reduction in harm up to and including Year 15 can be relied on as showing the worst case.	
VJC-002	Hydrology, Flood Risk and Drainage	Water Transport	5. How water is to be transported to site, and where in the traffic and construction documents the number of required vehicles appear. 6. Whether the Applicant has notified Wessex Water (which has just imposed a hosepipe ban) and Bristol Water of the need for substantial amounts of water for watering new plants since watering new plants does not appear in the Outline Water Resources Strategy [APP290].	Transport has included an allowance for servicing compounds (which includes water delivery) within the latest trip generation calculations presented in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) submitted at Deadline 7. The water-resource implications of landscape establishment have already been considered in response to DCO2.1at within the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**, pp. 64-66. Watering requirements will depend on the final planting, prevailing weather, soil moisture and establishment

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				performance and will be determined through the detailed LEMP. Water requirements will be met through an authorised supply arrangement in accordance with the **Outline Water Resources Strategy [APP-290]**. Associated water delivery movements are accounted for within the trip generation calculations presented in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7), submitted at Deadline 7.
VJC-003	Arboriculture	Maintenance of New Planting	7. The duration and extent of the obligations to maintain new plants beyond the first year and in particular the ongoing obligations to replant any which have failed. 8. The percentage of new plants the Applicant has assumed will die in the first year post planting.	The Applicant notes this comment. The matters raised in Points 7 and 8 are addressed in detail in the responses to VJC-004 to VJC-008 below
VJC-004	Landscape and Visual	Outline Landscape Environmenta	At page 400 onwards of REP5-098 the Applicant purports to respond to points I made in my Deadline 4 submission in	From a water-resources perspective, a fixed watering frequency or volume is not appropriate at outline stage. Water

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		I Management Plan	which I referred to my comments on documents submitted at Deadline 2 [REP3-175]. Once again, I expressed my concerns about the survival of the mitigation planting proposed in the absence of a watering regime which once again has not been properly addressed by the Applicant. In its response the Applicant has merely referred me to Outline LEMP [REP3-100] and the Outline Water Resources Strategy [APP290] but to no specific part of those documents. I have reviewed those documents and they do not satisfy my concerns about the likelihood that the huge number of new hedging plants, shrubs and saplings, which the Applicant will have to plant to comply with the commitments it is making to mitigate the harm which would be caused by the Scheme, will survive.	demand will vary according to the final planting specification, soil moisture, prevailing weather and establishment performance. The **Outline Landscape and Ecological Management Plan [REP6-037]** requires watering during establishment, with the detailed LEMP establishing the maintenance regime for the final planting. The Applicant considers the post-consent detailed design stage to be the appropriate point at which these measures are defined, as this will allow the management and maintenance strategy to be informed by the final scheme design, planting specifications and site conditions. The associated water-resource implications are addressed in VJC-002 and VJC-005 and were also considered

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Many of the assurances of the reduction in harm at Year 15 (which I do not accept) are heavily or wholly dependent on the survival and growth to the anticipated height of the hedges and trees to be planted. The Outline LEMP {REP3-100] refers in the most general of terms to watering of new plants in Hedgerow Management at 1.3.30 and 1.3.45 and to Woodland and Shelterbelt at 1.3.55 and to Scattered Trees and Native Shrub Management at 1.3.65. For ease these paragraphs are copied below – they all refer to regular watering in their first summer. *Hedgerow Management* *1.3.30 Newly planted hedgerows shall be regularly watered in their first summer and weeds shall be controlled through the use of bark mulch. A 75 mm layer of bark mulch 0.5 m either side of*	in response to DCO2.1at within the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the hedge will be spread along the length of the hedge immediately after planting to suppress weeds and retain soil moisture. *Hedgerow Management* *1.3.45 All trees and shrubs will be regularly watered in the first summer and thereafter as required to ensure successful establishment. Bark mulch is to be maintained at a depth of 75 mm and form a diameter of at least 0.5 m around each tree or shrub as required to suppress weeds and retain soil moisture. Woodland and Shelterbelt Management 1.3.55 All trees and shrubs will be regularly watered in the first summer and as required thereafter to ensure successful establishment. Bark mulch will be maintained at a depth of 75 mm, and 0.5 m in diameter around each tree or shrub as required to suppress weeds and retain soil moisture.* *Scattered Trees with Native Shrub Management*	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			1.3.65 All trees and shrubs will be regularly watered in the first summer and as required thereafter to ensure successful establishment. Bark mulch will be maintained at a depth of 75 mm, 0.5 m in diameter around each tree or shrub as required to suppress weeds and retain soil moisture. Despite the repeated reference to regular watering in the first summer and "as required thereafter to ensure successful establishment", nowhere have I been able to find details of how often this watering is expected to take place, nor how much water is to be used nor the source of that water, nor how it is to be taken to locations, some of which may be far from roads. This is not an area where there are mains taps so presumably all water would have to come in tankers. This information should be provided.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
VJC-005	Hydrology, Flood Risk and Drainage	Outline Water Resources Strategy	The Outline Water Resources Strategy document [APP290] refers to washing panels and lorries, amenity water for construction and directional drilling and dust suppression. I cannot trace any reference of watering plants. That would need a considerable amount of water which, presumably would need to be delivered in lorries. Similarly, I cannot trace any reference to water lorries in the traffic sections or journeys or other traffic impact caused by water deliveries. The Applicant needs to identify where in its documents it has accounted for water deliveries needed to comply with watering obligations. If not included this information needs to be provided to ensure a worst case is being assessed. It is not clear whether the Applicant has referred to the obligation to water new plants in its materials shared with Wessex and Bristol Water based on the Statement of Commonality. If the Outline Water Resources Strategy document	Transport has included an allowance for servicing compounds (which includes water delivery) within the trip generation calculations presented in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) submitted at Deadline 7. Water for construction and directional drilling and dust suppression are also accounted for in trips associated with the cable route. This matter has already been addressed in response to DCO2.1at within the **Applicant's Response to Submissions Received at Deadline 5 [REP6-060]**, pp. 64-66. The absence of a fixed Scheme-wide volume for landscape watering within the **Outline Water Resources Strategy [APP-290]** does not prevent the necessary water from being provided.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			does not refer to watering how would the water companies know of this requirement? This needs to be clarified. It is not clear to me for how long the Applicant intends (and will be obligated under the DCO) to maintain its mitigation planting. This needs to be specified clearly and included in the obligations in the DCO.	Actual demand will depend on the final planting, prevailing weather, soil moisture and establishment performance and will be determined through the detailed LEMP. Water requirements will be met through an authorised supply arrangement. Associated vehicle movements are accounted for within the trip generation calculations presented in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7), submitted at Deadline 7. Wiltshire Council's Deadline 5 submission also confirmed that it broadly accepts the conclusions of the **Outline Water Resources Strategy [APP-290]** and agrees that the Applicant has demonstrated the availability of water resources.
VJC-006	Arboriculture	New Planting Survival	Although there appears to be some acknowledgement that some plants will	The Applicant notes this comment. It is recognised within the **Outline**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			not survive and will need to be replaced, I am not aware of any figures for the percentage of loss in the first and subsequent years predicted by the Applicant. This information needs to be provided. The Applicant relies very heavily on the new planting to support its planned mitigation and, if the plants do not survive, this mitigation will be ineffective and the substantial harm the Applicant has admitted will occur, as a result of the Scheme, will continue for many years. To illustrate the likely problems with the survival of new planting, at Fig 1 is a photograph of a number of trees which were planted near Malmesbury (SN16 0JB) in November 2024. The owner of the land planted 800 native English trees. Despite regular watering using a	**Landscape and Ecological Management Plan (LEMP) [REP6-037]** that failure of a proportion of newly planted woody specimens is anticipated during establishment. Given the numerous environmental factors that are likely to influence the establishment success of new planting, including weather, soil characteristics, pest and disease pressures, and variability of environmental conditions between years post-planting, the Applicant does not consider it appropriate or meaningful to specify a predicted percentage of planting failures. Such estimates would not materially affect the proposed management approach and therefore will not be provided within the detailed LEMP.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			water bowser, well over half have already died this year or last year.  *Figure 1 trees planted in November 2024 the majority of which have already died*	The Applicant considers that the key consideration is not the proportion of planting that may fail in any given year, but whether there are appropriate mechanisms in place to secure the replacement of unsuccessful planting and achieve the intended long-term landscape outcome. The Applicant maintains that the provisions for replanting of woody specimens following any failure in establishment provided within the **Outline LEMP [REP6-037]** are sufficient and will ensure the proposed mitigation and enhancement measures, will be successfully delivered over the proposed timescales. Annex A of the **Outline LEMP [REP6-037]** provides and outline timetable for on-going management of habitats within the Scheme, including a commitment to replace all failed planting observed within the first five years post-construction, and replace any significant failures that may impact the integrity of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				proposed woody features throughout the lifetime of the Scheme. These commitments are also reflected in Paragraph 1.3.15. Delivery of the proposed habitat creation and enhancement set out within the **Outline LEMP [REP6-037]**, and associated mitigation, is secured via Requirement 7 in Schedule 2 of the **Draft DCO [REP6-005].**
VJC-007	Arboriculture	Photographic Evidence of New Hedging	Below are photographs I took on 15 August 2026 of new hedging planted beside footpath MALW51 in 2025. Every single plant appears to have died.	The Applicant notes the example provided from another location. However, the establishment and survival of planting is dependent on the particular circumstances of each site and cannot be extrapolated to the Scheme

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			 	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				
VJC-008	Arboriculture Hydrology, Flood Risk and Drainage	Watering of New Hedgerows	Although I am not an expert, there seem to be inconsistencies between the various outline management plans with the oLEMP referring to watering, and traffic plans not accounting for the necessary water. The Water Resources Strategy does not refer to watering of plants at all and the traffic materials may not include the necessary figures for water transporters.	See response to VJC-002 The water-resource and delivery matters raised are addressed in VJC-002, VJC-004 and VJC-005. The Applicant does not consider that generic nursery watering rates provide an appropriate basis for calculating a fixed Scheme-wide water demand. Watering will respond to the actual

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			I have not used AI to produce this document but did search "How Much Water Does a New Hedge Need. Hope Grove Nurseries recommend *"new bare root plants should have 5-10 litres of water once or twice a week (depending on the weather) for each metre of hedge. Root ball hedging plants will often need much more. If weather turns very hot then twice weekly watering would be a good idea until the heat subsides."* Hedge Nursery say Watering a new hedge The first is watering and we cannot stress this enough. If you possibly can, you should water thoroughly and frequently from early Spring, when the plants need a huge amount of energy to put on the spring growth of their roots, leaves and flowers, and throughout at least the first summer. Normal summer rainfall is not enough to establish new plants. After that the plants will be reasonably well established and you will only need to water if there is a prolonged dry spell.	requirements of the planting, soil moisture and prevailing weather conditions, with the detailed regime secured through the LEMP and water supplied through the arrangements identified in VJC-005.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Please water a wide area around each plant - arid soil is not conducive to root growth. After flooding the area around the plant, then apply water slowly so that the soil absorbs a large quantity of water. If there is a dry spell in autumn/winter, you should water again. Watering can be reduced in the 2nd year but is still important in dry spells In the light of the weather this summer and last, and the expectation that dry summers will continue, it seems clear that a huge amount of water and watering would be required to stand any chance of the saplings and hedges proposed to be planted by the Applicant surviving and has not been properly provided for in the various control documents.	
VJC-009	Consultation and Engagement	Misleading Images and Transparency	My other point relates to VJC004 on page 402 of REP5-098. Once again, the Applicant has failed to respond to the concern I have raised repeatedly about misleading images in their materials.	The Applicant does not agree that images provided are in any way misleading.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			They answer a question I did not raise. The question is not whether flexibility is needed, but why the panels shown in their materials are not of the type for which consent is sought. And, why they still use grazing sheep (something which many members of the public think is a significant benefit) when this is not a component of the Scheme. As with the misleading image of the BESS in the materials used during consultation, about which I have complained and had no proper response, I do not accept that the Applicant has been transparent and clear in its consultation materials and its current website. 20 A[APP290] August 2026	The Environmental Statement provides a detailed and comprehensive description of each of the components of the Scheme and is accompanied by an extensive range of images, drawings and Figures. The Applicant is applying for two PV systems; a Fixed PV system using Fixed Solar PV Tables with a maximum height of panels at 3.5 m AGL, and a tracking PV system using Tracking Solar PV Tables with a maximum height of panels at 4.5 m AGL. Both the fixed and tracker panels are shown within Plate 3-1, Plate 3-2 and Plate 3-5 of **ES Volume 1, Chapter 3 The Scheme [APP-055]**. These are illustrative, but representative, examples of the panels that are being applied for. Further, a suite of over 32 photomontages **[REP2-010 to REP2-012, AS-001 and REP5-044]** have been produced using baseline summer and winter photography.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				For viewpoints from where Photomontages have been produced, visualisations have been produced at Year 1 Winter to demonstrate the worst-case scenario, and at Year 15 Summer to demonstrate the screening effects of the Embedded Mitigation.

6.8 Green Lane Association

Table 6-9 Green Lane Association – Correspondence with the Applicant Regarding Vehicular Public Rights of Way [AS-025]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
GLA-001	Transport and Access	Introduction	I am writing on behalf of the Green Lane Association to bring to the Examining Authority's attention correspondence that has passed between the Association and the Applicant, Lime Down Solar Park, concerning the Byways Open to All Traffic (BOATs) and Unclassified County Roads (UCRs) that lie within and around the Scheme.	The Applicant notes this comment. Responses to specific points raised are provided in GLA-002-GLA-007 below.
GLA-002	Transport and Access	Route Consultation	On 23 June 2026 we wrote to the Applicant, setting out the Association's interest in these routes as the UK's largest national user group representing vehicular rights of way, and asking to be consulted on any proposals that might affect them, including construction traffic access, surfacing works or diversions. We asked in particular that any works carried out to accommodate construction access avoid unnecessary upgrading or engineering of the routes,	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			which we consider would damage their historic and rural character.	
GLA-003	Transport and Access	Construction Access	The Applicant replied on 23 July 2026, confirming that four routes shown on the map we had supplied – ST8784-02, ST8682-01, ST9082-03 and ST9282-02 – may be used by construction traffic during the build, but that there would be no permanent changes to any of the routes as a result of the Scheme, and that any routes used for construction access would be maintained throughout. The Applicant referred us to Chapter 13 (Transport and Access) of the Environmental Statement [REP4-014] for further detail.	The Applicant makes note of this comment.
GLA-004	Transport and Access	Historic Routes	We wrote back to the Applicant on 31 July 2026 seeking confirmation that the historic character of each affected route would be preserved despite their use for construction access, as we remain concerned that any upgrading of these routes could permanently erode the qualities for which they are valued.	**ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**, supported by **ES Volume 3 Appendix 12.7: Historic Landscape Assessment [APP-231]**, has assessed the potential impact of the Scheme on the historic landscape character.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				No significant effects were identified on the historic landscape character, including historic routes, as a result of impacts caused by the Scheme.
GLA-005	Transport and Access	Route Character	We received a reply from the Applicant on 18 August 2026 stating that their "intention is to maintain the existing character and form of the BOATs and UCRs identified, including where they may be used for construction access."	The Applicant makes note of this comment.
GLA-006	Transport and Access	Examination Record	I enclose copies of this correspondence, together with the map of the routes concerned, for completeness. We are writing simply so that the Examining Authority has a full record of the exchange and would be grateful if it could be added to the examination library for this application.	The Applicant makes note of this comment.
GLA-007	Transport and Access	Ongoing Involvement	We would welcome the opportunity to remain involved should any aspect of the Scheme affect these routes as the Examination proceeds, and ask that we are notified of any further developments relating to these and any other vehicular	The Applicant notes this comment and welcomes further engagement with Green Lane Association should the need arise.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			rights of way that affect the green lane network of unsealed UCRs and BOATs. If you require any further information from us in the meantime, please let get in touch.	

6.8.1 The Applicant notes that the Green Lane Association's submission includes copies of correspondence exchanged between the Association and the Applicant between June and August 2026 regarding Byways Open to All Traffic (BOATs) and Unclassified County Roads (UCRs), together with the associated map of routes. The correspondence is included by the Green Lane Association to provide the Examining Authority with a full record of the engagement undertaken.

6.8.2 For conciseness, the Applicant has not reproduced this correspondence within the table above. The Applicant's response instead addresses the substantive matters raised by the Green Lane Association in its covering submission.