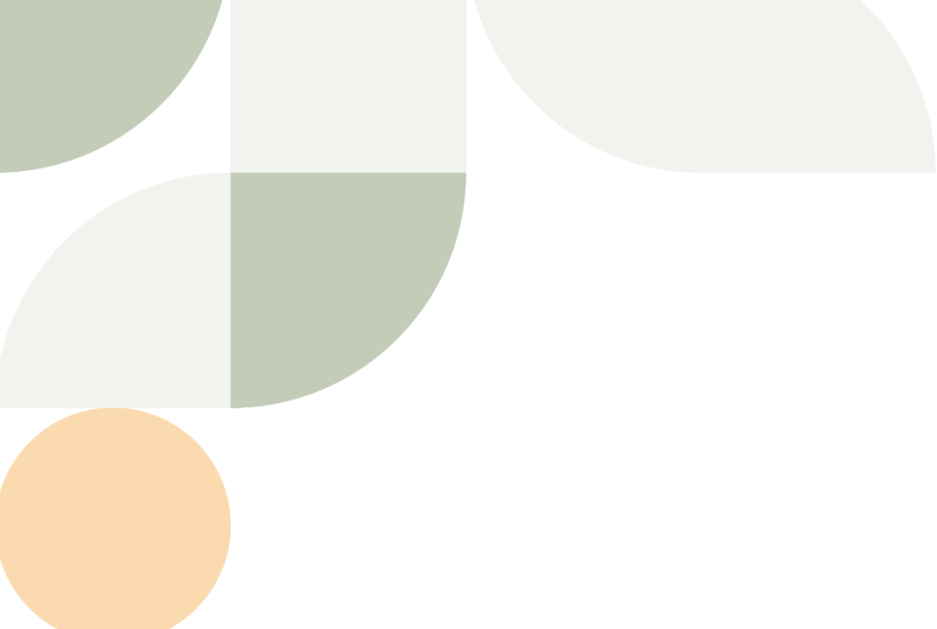




Lime Down

Solar Park

Position Statement with Wiltshire Council and the Integrated Care Board

October 2026

Revision 1

Planning Inspectorate Reference: EN010168

Document Reference: EXAM/9.90

The Infrastructure Planning (Examination Procedure) Rules 2010



List of Contents

1	Introduction	1
2	Summary of Positions	2
3	Conclusion	9

1 Introduction

- 1.1.1 This document has been drafted in response to a request for additional information by the Examining Authority (ExA) through Action Point 21 as set out in the **Action Points from Issue Specific Hearing 8 [EV14-010]**, held on 22 September 2026.
- 1.1.2 Therein, the Applicant was requested to submit an agreed position statement with Wiltshire Council, and NHS Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (ICB) at Deadline 7, following the ICB submission at Deadline 6 **[REP6-079]**.
- 1.1.3 This document therefore follows a meeting held on 25 September 2026 between the Applicant's health assessment technical lead, Wiltshire Council's Public Health team representatives, and the Estates Management and Sustainability representative from the ICB.
- 1.1.4 Section 2 of this document catalogues the main sub-topics pursuant to the assessment of human health as undertaken in the Environmental Statement (ES) **[APP-070]** and sets out the three parties' positions on those matters.
- 1.1.5 This document can be read alongside Section 3.14 of the Applicant's **Statement of Common Ground with Wiltshire Council [En010168/EXAM/8.2] (Revision 5)**, the most recent version of which has also been submitted at Deadline 7.

2 Summary of Positions

Sub-topic	Applicants Position	Wiltshire Council Position	Bath and North East Somerset, Wiltshire and Swindon ICB Position
Legislation and Policy	The Applicant considers that ES Volume 1, Chapter 18: Human Health [APP-070] and its supporting ES Volume 3, Appendix 18-2: Human Health: Legislation, Policy and Guidance [APP-245] has identified and appropriately considered all applicable legislation and policy.	Wiltshire Council considers that relevant planning policy has been adequately considered as part of the application.	The ICB considers that relevant planning policy has been adequately considered as part of the application.
Assessment Methodology	The methodology adopted within Section 18.4 of ES Volume 1, Chapter 18: Human Health [APP-070] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable.	Wiltshire Council is satisfied with the public health assessment methodology	The ICB is satisfied with the public health methodology.
Baseline Conditions	The baseline conditions which are detailed in Section 18.7 of ES Volume 1, Chapter 18: Human Health [APP-070] are representative of the baseline site conditions and has identified vulnerable population sub-groups, and where the extent of these groups affects the sensitivity of the population overall to changes in health and wellbeing conditions. The Applicant has specifically identified vulnerable populations with regard to mental	Wiltshire Council provided no comments on the baseline used for assessment. Wiltshire Council consider that where matters on mental health and risk-taking behaviour have been raised through Examining Authority's Questions or at Issue Specific Hearings, these have been suitably addressed and do not need to be commented upon further.	The ICB originally questioned the robustness of the baseline conditions assessment. This was then clarified and the ICB is now satisfied with the baseline conditions assessment.

Sub-topic	Applicants Position	Wiltshire Council Position	Bath and North East Somerset, Wiltshire and Swindon ICB Position
	health and high rates of related risk-taking behaviour, such as self-harm. This has therefore directly been applied to assigning populations no less than a medium sensitivity to any impacts from the Scheme that could affect mental health conditions.		
Assessment Results	The assessment results set out within Section 18.10 of ES Volume 1, Chapter 18: Human Health [APP-070] , including likely significant effects anticipated to physical and mental health and wellbeing receptors, are acceptable. No significant adverse effects to health and wellbeing are likely at any phase of the Scheme.	Wiltshire Council provided no comments on the assessment results presented within the ES.	The ICB provided no comments on the assessment results presented within the ES.
Cumulative Assessment	The assessment results set out within Section 18.13 of ES Volume 1, Chapter 18: Human Health [APP-070], robustly and comprehensively considers cumulative effects on health and wellbeing receptors. No significant cumulative adverse effects to health and wellbeing are likely at any assessed phase of the Scheme and assessed cumulative developments. Cumulative developments were reassessed during the submission of the Change Application in June 2026. No new cumulative developments were identified for consideration,	Wiltshire Council provided no comments on the assessment results presented within the ES with regard to cumulative effects on human health. As no material changes to the assessment outcome were identified in [CR1-046], Wiltshire Council does not have any further commentary.	The ICB align with Wiltshire Council's stance on the Cumulative Assessment.

Sub-topic	Applicants Position	Wiltshire Council Position	Bath and North East Somerset, Wiltshire and Swindon ICB Position
	and no material changes to the assessment of cumulative effects on human health were identified, as set out in paragraph 1.20.7 of Supporting Environmental Information Report (Change Application) [CR1-046] .		
Physical and Procedural Mitigation Measures	The proposed mitigation measures set out within Section 18.9 and 18.11 of ES Volume 1, Chapter 18: Human Health [APP-070], or as signposted to in other parts of the ES, are considered acceptable, and secured within: • Section 3.13 of the Outline Construction Environmental Management Plan [REP6-029]; • Section 3.13 of the Outline Operational Environmental Management Plan [REP6-031]; • Section 3.13 of the Outline Decommissioning Strategy [REP6-033]; • The Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104]; • The Outline Landscape and Ecological Management Plan [REP6-037];	Wiltshire Council provisionally agree the proposed mitigation measures as secured within the management plans signposted within the ES Chapter [APP-070] where they directly relate to public health. The Public Health team seek to caveat that this position is subject to agreement with colleagues in other teams more directly engaged with discussions of these mitigation measures. This includes, but is not limited to, the Council's Environmental Health team, PRoW and Countryside Access team, Highways team, and Landscape team. Any discussions on agreement of wider mitigation measures will be agreed internally at Wiltshire Council and set out as relevant to each technical discipline in the Applicant's Statement of Common Ground with Wiltshire Council (to be	ICB have reviewed the proposed mitigation measures and align with Wiltshire Council's position.

Sub-topic	Applicants Position	Wiltshire Council Position	Bath and North East Somerset, Wiltshire and Swindon ICB Position
	- The Outline Skills, Supply Chain and Employment Plan [REP3-104]; - The Outline Battery Safety Management Plan [REP3-106]; and - The Outline Construction Traffic Management Plan [REP6-041]. These measures are secured by Requirements 13, 14, 20, 16, 7, 18, and 15 respectively in Schedule 2 to the Draft DCO [REP6-005].	revised and submitted at Deadline 7) and finalised for Deadline 8.	
Communicative Mitigation Measures	The Applicant has committed to engagement with communities ahead of construction through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the Draft DCO [REP6-005]. Whilst this group is set up for the construction phase of the Scheme, the Applicant has committed to providing a designated community contact within the Scheme's operation and maintenance team during the operational lifetime of the Scheme, with a dedicated Community Liaison Manager committed to during peak replacement events and decommissioning. This is secured through the Outline Operational Environmental Management Plan [REP6-031] and Outline Decommissioning Strategy [REP6-033] by	Wiltshire Council notes that while the draft DCO requires a Community Liaison Group, it considers this insufficient on its own and recommends a detailed, LPA-approved Community Liaison Strategy setting out practical engagement measures, KPIs for community wellbeing, and implementation arrangements. Greater clarity is also needed on the role of the community liaison manager and how engagement measures in the CEMP and Stakeholder Communications Plan will operate effectively across the wide area and multiple communities affected by the project. See comment below.	The ICB agrees with Wiltshire Council and aligns with its view that the CLG is the best approach to support the local community. The ICB also agree that reviewing the Outline Terms of Reference would be beneficial to provide any comments that could prove helpful.

Sub-topic	Applicants Position	Wiltshire Council Position	Bath and North East Somerset, Wiltshire and Swindon ICB Position
	Requirements 14 and 20 in Schedule 2 to the Draft DCO [REP1-007]. The Applicant is required to submit a detailed CEMP substantially in accordance with the Outline Construction Environmental Management Plan [REP6-029] as part of the discharge of Requirement 13 in Schedule 2 to the Draft DCO [REP6-005]. The Applicant will at that point provide Wiltshire Council with details of the implementation of role of Community Liaison Manager, and of a Stakeholder Communication Plan, which is to be then approved by Wiltshire Council as the designated discharging authority. Display boards would be installed near to the entrances to construction compounds. Contact details for Site Manager(s), the Community Liaison Manager, and any other relevant contact point for information, nuisance or complaints, will also be distributed to Wiltshire Council, local parish councils and to Affected Persons. The Applicant furthermore confirms that requests by Wiltshire Council [REP2-046 and REP2-048] to more explicitly reference the Community Liaison Group in the Outline Construction Environmental Management Plan [REP6-029] and Outline Decommissioning Strategy [REP6-033] have		

Sub-topic	Applicants Position	Wiltshire Council Position	Bath and North East Somerset, Wiltshire and Swindon ICB Position
	been undertaken, and published at Deadline 3. This also includes clarification on the commitment to re-establish the Community Liaison Group in advance of decommissioning works commencing. The Applicant has furthermore committed to providing outline Terms of Reference for the Community Liaison Group. More detailed measures relating to practical engagement measures, KPIs for community wellbeing, and implementation arrangements will be included in the final Terms of Reference approved by the relevant planning authority pursuant to Requirement 4.		
Securing and Monitoring of Mitigation Measures	The Applicant considers that the wording of Requirement 4 in Schedule 2 to the Draft DCO [REP6-005], and the wording of the Outline Construction Environmental Management Plan [REP6-029] to identify a Community Liaison Manager and provide a Stakeholder Communications Plan (as secured through Requirements 13), together cover the level of detail being requested by Wiltshire Council. It should be noted that Wiltshire Council will be the designated discharging authority for both these requirements, and as such will be able to determine if sufficient detail has been included	The council recommends a comprehensive Community Liaison Strategy (not just Terms of Reference) is produced and secured through the DCO, which includes KPIs for engagement and wellbeing safeguards. The scheme is expected to have adverse effects on residents' amenity, wellbeing and mental health across construction, operation and decommissioning. While the assessment methodology is accepted, enhanced community engagement and wellbeing measures are	The ICB agrees with Wiltshire Council and aligns its view that the CLG is the best approach to support the local community. The ICB also agree that reviewing the Outline Terms of Reference would be beneficial to provide any comments that could prove helpful.

Sub-topic	Applicants Position	Wiltshire Council Position	Bath and North East Somerset, Wiltshire and Swindon ICB Position
	across these two requirements for them to be approved. The production of a Stakeholder Communications Plan, or Communication Strategy would thereafter be the responsibility of the Community Liaison Group to draft following its establishment, and ahead of any construction works on the Scheme commencing. The Applicant notes that Wiltshire Council's JSNA, and the English Indices of Deprivation have been updated since DCO submission, and commits to ensuring these will be referenced in any relevant future submission. The Applicant has continued to keep channels of communication open for informal discussion between members of the public and the Applicant team throughout the DCO examination process. Since the meeting of 3 July 2026, the Applicant has explored how additional community outreach can be undertaken – predominantly through the project website, and is to share outline or draft terms of reference with Wiltshire Council (including the Public Health team) ahead of Deadline 7.	needed, and future submissions should reference the updated Wiltshire JSNA 2025 and the 2025 English Indices of Deprivation. Meeting with applicant on 03 July 2026. The applicant has been asked to provide details of any ongoing and enhanced community engagement that sits outside the formal DCO and examination process. This is relevant as the impact on communities is ongoing and meaningful engagement will help form the terms of reference for the Community Liaison Group, should permission be granted.	

3 Conclusion

- 3.1.1 This document sets out the positions of the Applicant, Wiltshire Council, and the Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board with respect to the assessment of human health in respect of the Lime Down Solar Park DCO Application.
- 3.1.2 This document confirms that the position of the three parties is broadly in alignment with regard to:
- Legislation and policy;
 - Assessment methodology;
 - Baseline conditions;
 - Assessment results; and
 - Cumulative assessment;
- 3.1.3 Positions in regard to physical and procedural mitigation measures are broadly in alignment albeit caveated by the scope of involvement in negotiations on these matters by the present representatives of Wiltshire Council's Public Health team and of the ICB.
- 3.1.4 The parties confirm that the areas of communicative mitigation measures and the securing and monitoring of those measures has been subject to extensive discussion throughout the examination stage, with closer alignment on positions still being sought as of Deadline 7. This is also shown in Section 3.14 of the Applicant's **Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 5)**, the most recent version of which has also been submitted at Deadline 7.