Lime Down
Solar Park

Statement of Common Ground with Wiltshire Council (Clean)

October 2026

Revision 6

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Statement of Common Ground Signatures

This Statement of Common Ground has been prepared and agreed by Lime Down Solar Park Limited (the Applicant) and Wiltshire Council.

Signed on behalf of Lime Down Solar Park Limited

Name: [redacted]

Position: Senior Project Development Manager

Date: 16/10/26

Signature:

[redacted]

Signed by the Wiltshire Council

Name: [redacted]

Position: Director – Planning, Economy and Climate

Date: 16/10/2026

Signature [redacted]

1 Introduction

1.1 Purpose of this Document

1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Lime Down Solar Park Development Consent Order (the Application) made by Lime Down Solar Park Limited (the Applicant) to the Secretary of State for Energy Security & Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).

1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.

1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not yet been reached. SoCGs are an established means in the DCO consenting process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared by (1) Lime Down Solar Park Limited as the Applicant and (2) Wiltshire Council.

1.2.2 Collectively, Lime Down Solar Park Limited and Wiltshire Council are referred to as ‘the parties’.

1.3 Terminology

1.3.1 In the tables in Section 3 of this SoCG:

- “Agreed” indicates where the issue has been resolved.
- “Not Agreed” indicates a final position, and
- “Under Discussion” indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

2 Record of Engagement

2.1 Summary of Consultation

2.1.1 The parties have been engaged in consultation since 8 November 2023. A summary of the meetings and correspondence that has taken place between the Applicant and Wiltshire Council is outlined in Table 1-1.

Table 2-1: Summary of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
15 October 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss matters relating to Bincombe Wood
13 October 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Steering Group meeting discussing project and programme updates
8 October 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss highways and transport matters
7 October 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss S106, further PPA and the Statement of Common Ground
7 October 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Ecology and Biodiversity matters
7 October 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss human health matters
1 October 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers and Historic England	Meeting to discuss the contents of the Archaeological Mitigation Strategy (AMS)

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
28 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers and Historic England	Meeting to discuss the contents of the AMS and the reasoning for a Detailed Archaeological Mitigation Strategy
28 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss S106, further PPA, outline Terms of Reference for the Community Liaison Group and Mitigation Route Map
24 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Climate Change.
23 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss landscape matters.
23 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Hydrology, Flood risk and Drainage, matters.
21 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss arboricultural matters.
11 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Hydrology, Flood risk and Drainage, matters.
11 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss socio-economic and innovation forum matters.
9 September 2026	Online MS Teams Meeting between the	Meeting to discuss S106 and further PPA

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Applicant and Wiltshire Council Officers	
8 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Steering Group meeting discussing project and programme updates.
7 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss human health matters
4 September 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Public Rights of Way matters.
13 August 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Arboricultural matters.
13 August 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Transport and Access matters.
10 August 2026	Email to County Archaeologist	Issue of updated evaluation reports.
5 August 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss the Innovation Forum concept
4 August 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Steering Group meeting discussing project and programme updates.
4 August 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss arboricultural matters

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
30 July 2026	Email to County Archaeologist	Issue of updated AMS
29 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss S106 and further PPA
29 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Landscape and Visual matters. It was agreed by both parties that further engagement was required to meaningfully progress matters in relation to Landscape and Visual.
29 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Socio-Economics matters.
29 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Built Heritage matters.
28 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Human Health matters.
28 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Soils and Agriculture matters.
27 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Ecology and Biodiversity matters and Arboricultural matters
24 July 2026	Online MS Teams Meeting between the	Meeting to discuss hydrology, flood risk and drainage matters and

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Applicant and Wiltshire Council Officers	consolidating and simplifying the relevant section of the SoCG (Section 3.7). Following the call the two parties worked collaboratively to amend Section 3.7 to make it more focused and concise to aid all parties.
24 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss archaeological matters
16th July	Email from County Archaeologist	Confirmation of approval of report
15 July 2026	Email to County Archaeologist	Issue of geophysical survey report on cable route corridor
8 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss monitoring contributions
8 July 2026	Online MS Teams Meeting between the Applicant and Council Officers	Meeting to discuss climate matters
7 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
6 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officer.	Meeting to discuss Hydrology, Flood risk and Drainage, matters.
3 July 2026	Online MS Teams Meeting between the	Meeting to discuss Human Health matters.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Applicant and Wiltshire Council Officer.	
30 June 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officer.	Meeting to discuss Socio-Economics matters.
24 June 2026	Online MS Teams Meeting between Applicant and Wiltshire Council Officer.	Meeting to discuss topics in the SoCG relating to Public Rights of Way.
18 June 2026	Email to Wiltshire Council Ecology Officers	Provision of GIS dataset containing mapped Biodiversity Net Gain information, including baseline habitats, trees, hedgerows and watercourses along with anticipated retention, loss, creation and enhancement data of post-development features.
9 June 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
28 May 2026	Email to County Archaeologist	Issue of archaeological evaluation reports
12 May 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
5 May 2026	Site Visit	Site visit to consider potential for impact to Grittleton House as a result of cable and compound
30 April 2026	Email to Wiltshire Council.	Provision of the Applicant's technical note responding to Wiltshire Council's letter

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		dated 24 March 2026 regarding the LLFA hydraulic modelling requirement for panel fields, access tracks and drainage connectivity.
24 April 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officer.	Meeting to discuss Climate Change considerations.
14 April 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss highways matters in relation to the Draft Development Consent Order including: • Enforcement of Assigned Construction Routes; • Bonds for Highway Damages; • Liabilities, Insurance and Indemnity Cover; • Processes for Assigning Construction Contractors; • Highway Inspection Units; and • Protective provisions.
14 April 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
1 April 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss ecology and arboricultural matters including: • Hedgerow Removal & Rochdale Envelope Approach; • Arboricultural Method Statement;

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		• Cable Route Corridor – Survey Scope/Impacts on Bats; • Biodiversity Net Gain Metric; • Cable Route Corridor Habitat Classification; • Otters and Water Voles – Cable Route Corridor; • Skylark Mitigation Approach; and • Great Crested Newts – District Level Licence.
01 April 2026	Email to Wiltshire Council.	Provision of Schedule of Changes to the Draft DCO to Wiltshire Council for comment.
27 March 2026	Email to Wiltshire Council.	Provision of Draft DCO (for submission at Deadline 1) to Wiltshire Council for comment.
26 March 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss the transport points raised by Wiltshire Council in their Relevant Representation.
24 March 2026	Email / letter from Wiltshire Council.	Provision of Wiltshire Council's LLFA hydraulic modelling requirement note, requesting quantitative hydrological / hydraulic modelling for panel fields, access tracks and drainage connectivity.
12 March 2026	Online MS Teams Meeting between the Applicant and Email from Wiltshire Council Officers.	Meeting to discuss the proposed changes to the built heritage management plans. Provision of Wiltshire Council update to Issues

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		Tracker following review of DCO application documentation and Relevant Representation response.
10 March 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
5 March 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss matters relating to socio-economics, tourism and recreation in Wiltshire Council's Relevant Representation.
2 March 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss matters relating to public rights of way in Wiltshire Council's Relevant Representation.
24 February 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss Wiltshire Council's comments on the draft Development Consent Order.
20 February 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss matters relating to noise and vibration in Wiltshire Council's Relevant Representation.
18 February 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss the built heritage Relevant Reps and to agree approach going forward.
12 February 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss hydrology points raised in Wiltshire Council's Relevant Representation.
10 February 2026	Online MS Teams Meeting between the	Steering Group meeting discussing project and programme updates.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Applicant and Wiltshire Council Officers.	
13 January 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
9 January 2026	Relevant Representation.	Wiltshire Council submitted a relevant representation to the Planning Inspectorate.
2 December 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
19 November 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss the progress of the geophysical survey of the Cable Route Corridor
4 November 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
29 October 2025	Email / letter to Wiltshire Council.	Notice under Section 56 of the Planning Act 2008 issued by the Applicant to Wiltshire Council.
22 October 2025	Letter to Wiltshire Council.	Tabular response to the points raised by Wiltshire Council on the Draft DCO as set out in their letter dated 5 September 2025.
7 October 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
5 September 2025	Letter from Wiltshire Council.	Provision of comments from Wiltshire Council on the Draft DCO to be submitted

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		as part of the DCO application received on 15 August 2025.
2 September 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
28 August 2025	Online MS Teams Meeting between the Applicant, Wiltshire Council and Transport Planning Associates.	Meeting to confirm documents being submitted as part of DCO, confirmation of final study area, confirmation of proposed access arrangement to Lime Down D and E, discussion of methodology for link sensitivity though CNL, confirm details of trip generation methodology, set out proposed mitigation for AILs, confirm requirement for highway condition surveys, confirmation of additional swept-path analysis to be provided on construction routes.
22 August 2025	Email from Wiltshire Council.	Provision of Wiltshire Council comments on Issues Tracker received on 8 August 2025.
22 August 2025	Letter from Wiltshire Council.	Wiltshire Council response to Applicant's Potential Main Issues for Examination (PMIE) letter received on 8 August 2025.
15 August 2025	Letter to Wiltshire Council.	Applicant response to the letter received by Wiltshire Council on 29 July 2025 addressing the points raised.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
15 August 2025	Email to Wiltshire Council.	Provision of the Draft DCO to Wiltshire Council for their comment.
13 August 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss the archaeological mitigation strategy.
8 August 2025	Email to Wiltshire Council.	Provision of updated Issues Tracker with inclusion of issues raised in Targeted Consultation response.
8 August 2025	Letter to Wiltshire Council.	Provision of draft PMIE letter for review and comment.
5 August 2025	Email to Clarkson & Woods Ltd. from Wiltshire Council ecology officer.	Provision of feedback as requested, subsequent to review of rationale presented in email dated 24 July 2025. Reiterated advice given during meeting on 14 July 2025 that the Council's stance is that a Zone of Influence (ZoI) of at least 15km should be used from the Solar PV Sites. Also, advised that the Council considers the 500m ZoI being used for the Cable Route Corridor to be insufficient.
29 July 2025	Letter from Wiltshire Council.	Points raised about the sharing of information in advance of the DCO application being submitted.
25 July 2025	Email to Wiltshire Council.	Provision of updated Issues Tracker with response from Applicant to points raised by Wiltshire Council in response of 4 June 2025.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
24 July 2025	Email to Wiltshire Council ecology officer from Clarkson & Woods Ltd.	Further to the meeting on 14th July 2025, Clarkson & Woods Ltd sent email with the objective of presenting the rationale for the ZoI used to determine the assessment of potential cumulative effects on ecology. Review by, and response from Wiltshire Council's ecology officer was requested.
23 July 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss the approach to the noise and vibration assessment and the additional information to be included in the ES further to that provided in the PEIR
17 July 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss the agreed approach to assessing cumulative impacts and the methodology used to define the Zone of Influence (ZoI) for the cultural heritage assessment
14 July 2025	Online MS Teams Meeting between the Applicant, Wiltshire Council Officers and Clarkson & Woods Ltd.	Meeting to discuss project updates and ecology issues. Key topics included survey results and on-going surveys, cumulative assessment, strategic significance for Biodiversity Net Gain, ground-nesting bird mitigation and targeted consultation.
11 July 2025	Targeted consultation response	Response to the targeted consultation received from Wiltshire Council.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
8 July 2025	Email from the Applicant to Wiltshire Council	Email regarding update to the air quality assessment. Details of back-up generators provided.
8 July 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Steering Group meeting discussing project and programme updates.
13 June 2025	Letter from Wiltshire Council	Wiltshire Council response to the Applicant's letter of 23 May 2025 regarding cumulative lists
9 June 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Steering Group meeting discussing project and programme updates.
6 June 2025	Letter from Wiltshire Council	Provision of Wiltshire Council response to Adequacy of Consultation Milestone document received on 21 May 2025
5 June 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to Wiltshire Council for the launch of the targeted consultation
5 June 2025	Online MS Teams Meeting between the Applicant, Wiltshire Council and Transport Planning Associates	Meeting to discuss study area, confirmation of proposed access arrangements, discussion of methodology for link sensitivity though CNL, discuss details of trip generation methodology, set out proposed mitigation for AILs, confirm requirement for highway condition surveys, confirm

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		requirement for swept-path analysis to be provided on construction routes.
4 June 2025	Email from Wiltshire Council	Provision of Wiltshire Council comments on Issues Tracker received on 9 May 2025
3 June 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to Wiltshire for the launch of the targeted consultation
27 May 2025	Online MS Teams Meeting between Applicant, the Applicant and consultant on behalf of Wilshire Council LLFA	Meeting to discuss flood and drainage updates to the scheme, Wiltshire Council Requests for DCO submission, Wiltshire Council Consultee Comments and actions taken since last statutory consultation meeting.
23 May 2025	Letter from the Applicant to Wiltshire Council	The Lime Down Solar Project response to the 6 December 2024 letter from Wiltshire Council providing feedback on the cumulative lists.
23 May 2025	Email from Applicant to Wiltshire Council	Air quality assessment summary provided and an updated version of the air quality supplementary planning guidance was requested.
21 May 2025	Email to Wiltshire Council	Provision of Adequacy of Consultation Milestone document for review and comment

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
19 May 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers	Meeting to provide supplementary consultation to the LPA and an opportunity to discuss any outstanding issues and/or potential impacts and adopted mitigation commitments in relation to the Scheme's approach to arboriculture.
16 May 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Meeting to discuss geophysical survey of the Cable Route Corridor.
9 May 2025	Email to Wiltshire Council	Provision of initial Issues Tracker for review and comment
6 May 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
6 May 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council.	Meeting to discuss the Archaeological Mitigation Strategy.
23 April 2025	In person meeting between the Applicant and Wiltshire Council Archaeology Officer.	Site meeting to view the archaeological evaluation trenches.
17 April 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss planned growth, the format of a DCO application and review process.
11 April 2025	In person meeting at Grittleton between	Meeting and site visit to provide update on scheme from a built heritage point of

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Wiltshire Council and the Applicant.	view and understand any concerns regarding the western portion of the proposals.
9 April 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Meeting to discuss air quality methodology and statutory consultation feedback.
8 April 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
1 April 2025	Online MS Teams Meeting between the Applicant, Applicant and Wiltshire Council [redacted]	Meeting to discuss the assessment methodology and preliminary assessment outcomes for socio-economic assessment.
1 April 2025	Online MS Teams Meeting between the Applicant, Applicant and Wiltshire Council [redacted] - Public Health Specialist).	Meeting to discuss Community Relationship Manager and Local Mental Health support with public health.
24 March 2025	Online MS Teams Meeting between the Applicant, Applicant and Wiltshire Council.	Meeting to discuss the scheme in relation to materials and waste, scoping opinion response and statutory consultation responses.
24 March 2025	Online MS Teams Meeting between Applicant and Wiltshire Council Tree Officers.	Meeting to discuss draft tree impact plans detailing high-level arboricultural constraints data, PEIR Scheme Red Line Boundary and PEIR proposed layout.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
19 March 2025	Online MS Teams Meeting between the Applicant, Noise Consultant and Wiltshire Council.	Meeting to discuss the scheme, methodology and noise surveys.
19 March 2025	Statutory consultation response.	Response to the statutory consultation received from Wiltshire Council.
17 March 2025	Online MS Teams Meeting between the Applicant, Wiltshire Council [redacted] and Transport Planning Associates.	Meeting to discuss study area and baseline conditions, construction programme and vehicle trip generation, construction vehicle access and routing, abnormal loads and outline public right of way management plans.
12 March 2025	Online MS Teams Meeting between Applicant, the Applicant (Lanpro and TPA), Wiltshire Council and Transport Planning Associates.	Meeting to discuss Construction Traffic Management Plan and Transport Statement Scoping Note. Discussing Template of Public Right of Way Management Plan. Discuss delivery of permissive access routes on the Scheme and improvements to the public rights of way network.
10 March 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
10 March 2025	Online MS Teams Meeting between the Applicant and Wilshire Council Public Protection Team.	Meeting to discuss Specific issues (contamination, geology, private water supplies, mining/geohazards), Assessment methodology/

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		mitigation of risks and future engagement.
4 March 2025	Online MS Teams Meeting between the Applicant, Wiltshire Council and Clarkson & Woods Ltd.	Meeting to review the draft Technical Response to Statutory Consultation provided by Wiltshire Council, in relation to ecology. Key topics included Cable Route Corridor surveys, management proposals for the Site, worst-case scenario assessment, Bath and Bradford on Avon (BaBOA) Bats SAC, assessment of impacts on bats, and bird surveys.
4 March 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Meeting to discuss technical responses from Wiltshire Council to PEIR and onward approach to engagement in relation to public health.
27 February 2025	Online MS Teams Meeting between Applicant, the Applicant and consultant on behalf of Wilshire Council LLFA.	Meeting to discuss Hydrology, Flood Risk and Drainage following receipt of draft comments from Wiltshire Council.
4 February 2025	Hybrid Meeting at County Hall and Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	The first Steering Group meeting that has been set up under the Planning Performance Agreement with Wiltshire Council.
20 January 2025	In person and Online MS Teams Meeting between Applicant, the Applicant, Community Liaison Lead and Wiltshire Council	Meeting to aid scheme understanding ahead of the launch of statutory consultation on 29 January 2025.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Officers and Council Members at Trowbridge County Hall.	
17 January 2025	Online MS Teams Meeting between the Applicant/ Lanpro, Wiltshire Council and Landscape officer and Cotswold National Landscape Officer (Re-scheduled meeting from 15 January 2025).	On site meeting to discuss landscape and visual matters.
13 January 2025	Hybrid Meeting at County Hall and Online MS Teams Meeting between Applicant, the Applicant, Consultants and Wiltshire Council.	Briefing to explain the Scheme discuss and the role of Wiltshire Council in the NSIP process and the upcoming statutory consultation.
6 December 2024	Letter from Wiltshire Council	Response to long and short lists for cumulative impact assessment received on 5 November 2024
6 December 2024	Letter from Wiltshire Council	Formal response on Statement of Community Consultation
20 November 2024	In person meeting between the Applicant and Wiltshire Council.	Site visit to discuss archaeological trenching.
19 November 2024	Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council Officers and Air Quality Officer	Meeting to discuss the scheme, methodology for the air quality assessment and scoping opinion feedback.
6 November 2024	In person meeting at County Hall between Applicant, the Applicant, Wiltshire Council	DCO Strategic Update Meeting to provide a project update and to discuss the

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Officers and Community Relations Lead.	Statement of Community Consultation.
5 November 2024	Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council Officers and Hydrology, Flood Risk and Drainage Officer.	Meeting to discuss the scheme, scoping opinion feedback, surface water management for BESS/substations, surface water management for panelled areas and areas of concern.
5 November 2024	Email to Wiltshire Council.	Provision of long and short lists for cumulative impact assessment for review and comment.
4 November 2024	Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council Officers and Noise and Vibration Officer.	Meeting to discuss the scheme and methodology.
30 October 2024	Online MS Teams Meeting between the Applicant and Wiltshire Council.	Discuss approach to built heritage assessment and identify initial concerns.
22 October 2024	Email between the Applicant and Wiltshire Council [redacted]	Introductory email to provide project update.
10 October 2024	Online MS Teams Meeting between the Applicant, Wiltshire Council Public Health and OHID.	Introductory meeting to discuss approach to human health assessment, data sources, and community engagement.
2 October 2024	Email to Clarkson & Woods Ltd. from Wiltshire Council ecology officer.	Provision of dedicated Technical Note regarding Annex II bat roosts and

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		associated consultation zones.
17 September 2024	Online MS Teams Meeting between the Applicant, Wiltshire Council and Clarkson & Woods Ltd.	Meeting to discuss ecology survey scope and scoping responses received from Wiltshire Council. Key topics included bat consultation zones along Cable Route Corridor, approach to bat surveys, farmland bird mitigation, dormouse survey, and assessment of impacts at Land near Melksham Substation and Cable Route Corridor. A PowerPoint presentation was provided by Clarkson & Woods outlining agenda, project overview, survey scope and consultation responses received to date from Wiltshire Council.
17 September 2024	Online MS Teams Meeting between Cotswold National Landscape, Wiltshire Council Landscape Officer and the Applicant	To discuss comments made at Scoping by Wiltshire Council and the Cotswold National Landscape Board in relation to the landscaping assessment.
29 August 2024	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council.	Meeting to discuss scope of archaeological evaluation works.
8 July 2024	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Planning,	Meeting to discuss the proposed Planning Performance Agreement (“PPA”), that was shared with Wiltshire Council by email on Friday 14 June 2024.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
26 June 2024	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers	Meeting to introduce team, discuss project and programme updates and an engagement update.
31 May 2024	Online MS Teams Meeting between Applicant, Community Relations Lead and Wiltshire Council Member[redacted], Wiltshire Council).	Meeting to discuss project and any issues or concerns.
11 April 2024	Online MS Teams Meeting between the Applicant and Wiltshire Council.	Meeting to establish study area and approach for low background noise levels and night-time tracker panels.
12 March 2024	Online Zoom Meeting between Applicant, the Applicant and Wiltshire Council Member [redacted]	Meeting to introduce team, Lime Down Solar Park proposals and Stage One Consultation.
6 March 2024	Online MS Teams Meeting between Applicant and Wiltshire Council Archaeology.	Meeting to discuss Geophysics, the Land north of Whitley, and requirements of the Archaeological Assessment.
5 March 2024	Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council and Highways.	Meeting to discuss the development process, transport and access, cable routing and timescales.
5 March 2024	Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council and Communications Business Partner.	First briefing to enable the Communications Business Partner to understand more about the project and the proposals. This was essential given the local and national media interest and

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		the need for the Wiltshire Council Communications team to have a greater understanding to respond to any media enquiries the council received.
15 January 2024	Hybrid Meeting at County Hall and Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council and Council Members.	Meeting to brief Council Members on project updates.
8 November 2023	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Planning.	Initial meeting between the Applicant and Wiltshire Council to introduce the Scheme and plan future engagement.

3 Matters Raised

3.1.1 This section sets out a table for each relevant topic, identifying where matters are agreed, still under discussion, or not agreed.

3.1 Principle of Development

Table 3-1: Principle of Development

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.1.1	Planning policy context in decision making	Wiltshire Council confirms that the Applicant has identified the appropriate legislative and national and local planning policy context for the Scheme, subject to a number of factors being suitably addressed, including flood and drainage, the landscape, particularly in and around AONB's (NL's) and appropriate consideration of cumulative effects	The Scheme needs to be considered under Section 104 of the PA 2008 and in assessing the merits of the Application it must be considered in accordance with the relevant national policy statement, with NPS EN-1, NPS EN-3 and NPS EN-5 being of primary importance, but regard must also be had to any local impact report and any other important and relevant matters, including the relevant Local Development Plan.	**Agreed**
3.1.1a	Planning policy context in decision making	The council's assessment in its Local Impact Report at Appendix A [REP1-137] identified a number of local policies in which the council considered the proposed development was not in compliance with.	The Applicant has demonstrated how the Scheme complies with the Wiltshire Core Strategy in Annex B: Local Policy Accordance Tables of the **Planning Statement [REP7-064]** which sets out an appraisal of the Scheme against the relevant policies.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.1.2	Policy and planning balance	Wiltshire Council requested further information from the Applicant before the council could make an objective balanced planning judgement on the merits of the proposed scheme and therefore adequately assess its compliance with the key policies. Insufficient information has been submitted by the Applicant during the course of the examination which would alter the council's original assessment of compliance with the key policies, as detailed within Appendix A of its Local Impact Report [REP1-137]. Therefore, the council continues to contend that the proposed development is not in compliance with the key policies.	The Applicant considers that the planning balance applied to the Scheme as set out in Section 9 of the **Planning Statement [REP7-064]** has been appropriately considered and the Scheme is acceptable in planning terms.	**Not Agreed**

3.2 Draft Development Consent Order Process

Table 3-2: Draft Development Consent Order

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.2.1	Legislation and Policy Draft Development Consent Order Process	Wiltshire Council commented on the Draft DCO before submission. Although the applicant responded, only minor changes were made, meaning most the council's concerns remain unresolved. As highlighted within its Relevant Representation, the council expects these issues to be properly addressed during the Examination. Additionally, the council has identified additional Requirements in its Written Representation and Local Impact Report and changes the council considered were required to the draft DCO and associated management plans / control documents during the course of the examination. The council welcomed the opportunity to develop and agree protective provisions for the benefit of the local highway authority within the draft DCO. Whilst the council appreciates that the Applicant has made some alterations to	The Applicant considered Wiltshire Council's comments and included them within the **Draft DCO [REP7-007]** submitted at Deadline 7 where practicable. The **Draft DCO [REP7-007]** submitted at Deadline 7 will be accompanied by a draft Schedule of Changes. Within this document, the Applicant explained specifically where an amendment was made to the **Draft DCO [REP7-007]** submitted at Deadline 7 in response to Wiltshire Council's comments. Management plans have been updated throughout the DCO Examination in response to comments from Wiltshire Council. The form of protective provisions for the benefit of Wiltshire Council as local highway authority are now agreed and will be included in Part 11 of Schedule 15 to the **Draft DCO [REP7-007]** submitted at Deadline 7.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the draft DCO and associated management plans / control documents, the council maintains that the changes made do not fully address the council's concerns. Further amendments are required.		
3.2.2	Draft DCO – definition of "maintain"	The council maintains that additional clarity is required with respect to the definition of 'maintain'. It is suggested that the definition is amended to state: "*'maintain' includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace (including scheduled replacement* ***within the parameters assessed in the environmental statement and secured by the documents certified under article 42 and the requirements****) and improve any part of the authorised development and "maintenance" and "maintaining" are to be construed accordingly;*"	The Applicant considers that the definition of "maintain" in Article 2 of the **Draft DCO [REP7-007]** is appropriate as the scope of any replacement activities is already limited to those assessed in the Environmental Statement pursuant to Article 5(3). However, noting the recent amendments to the definition of "maintain" made by the Secretary of State in the made DCO for Green Hill Solar Farm, the Applicant will be updating the DCO at Deadline 8 to reflect this wording and considers this wording addresses the concerns raised by Wiltshire Council.	**Agreed**
3.2.3	Draft DCO – Article 9	The council considers that Article 9(3) should be deleted, or made expressly subject to Part 11 of Schedule 15 and	The Applicant confirms that Article 9(3) of the **Draft DCO [REP7-007]**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the permit scheme's ordinary mechanisms. It is the council's understanding that the Applicant will amend Article 9(3) to make it clear that it is expressly subject to the dispute resolution mechanism contained within the Protective Provisions.	submitted at Deadline 7 has been updated to make reference to the protective provisions at Part 11 of Schedule 15 as the appropriate dispute resolution mechanism in relation to the permit scheme.	
3.2.4	Draft DCO – Article 16	The council maintains that the four-week period in Article 16(5)(a) is insufficient. Therefore, Wiltshire Council is seeking an eight-week notice period, but suggests the addition of the wording "*unless a shorter period is agreed in writing by the traffic authority*." This is a compromise on the council's standard 12-week period. Wiltshire Council also considers that consent under 16(4)(b) should be expressly carved out from Article 47. The council requests the addition of the following wording as new Article 16(8): "*Article 47 does not apply to any consent required under article 16(4)(b)*."	The Applicant maintains that the four-week period in Article 16(5)(a) is a notification provision only and does not require the traffic authority to review or approve traffic regulation measures within that timeframe, as approval occurs through the CTMP under Requirement 15 which provides the Council with a 10-week approval period. The Applicant therefore considers no amendment to Article 16(5)(a) is necessary, and the proposed flexibility wording is not required. The Applicant does not consider that Article 16(4)(b) consent should be carved out from Article 47. The deemed consent procedure under Article 47 provides an appropriate and certain mechanism for determining	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			consent applications within a defined timeframe, and its removal in this context would leave the process without a binding determination mechanism.	
3.2.5	Draft DCO – Articles 40 and 41	It is the council's understanding that a cross-reference will be added within Articles 40 and 41 to ensure that the powers relating to hedgerows and trees are exercised consistently with the environmental management plans. The following wording will be included within both Articles: "*The powers conferred by this article must be exercised in accordance with the relevant environmental management plan approved under Schedule 2, having regard to the phase of the authorised development during which the works are undertaken.*"	The Applicant has included wording in Articles 40(6) and 41(5) expressly referring to the management plans with which the powers conferred by those articles much be exercised in accordance with. This update has been included in the **Draft DCO [REP7-007]** submitted at Deadline 7.	**Agreed**
3.2.6	Draft DCO – Requirement 3 Phasing Plan	The council maintains its position, as initially set out within its Written Representation [REP1-138] and most recently within its response to ExQ2 DCO2.1 [REP5-112] and at ISH9, that the phasing plan should be submitted to and approved by the local planning	The Applicant does not consider it necessary for Wiltshire Council to approve the phasing plan. This plan is being provided to assist Wiltshire Council in understanding the proposed timing and sequencing of construction	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		authority in relation to Requirement 2. There is substantial precedent for the requirement for the phasing plan to be submitted to and approved by the local planning authority. This includes in the following made solar DCO's: Byers Gill Solar (2025), Cleve Hill Solar Park (2020), Little Crow Solar Park (2022), Longfield Solar Farm (2023), Mallard Pass Solar Farm (2024), North Lincolnshire Green Energy Park (2025), Oaklands Farm Solar Park (2025), One Earth Solar Farm (2026), Springwell Solar Farm (2026), Stonestreet Green Solar (2025), Sunnica Energy Farm (2024) etc. Given the uncertainty with the two grid connection dates, the council wishes to make sure that the impacts to the community are minimised as much as possible i.e. by ensuring the construction programme is concise and not unnecessarily elongated and also that the construction is in line with the confirmed grid connection dates so the equipment is not erected and left until connection, i.e. to minimise adverse environmental effects.	works. Wiltshire Council will be able to approve the design and mitigation measures relating to such construction works pursuant to the other pre-commencement requirements.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.2.7	Draft DCO – Requirement 4 and Schedule 13	Whilst Wiltshire Council welcomes the inclusion of the Outline Terms of Reference for the Community Liaison Group as a certified document, the council considers that further changes are required to Requirement 4 and the Outline Terms of Reference for the Community Liaison Group. The council maintains that the CLG should be established pre-construction to enable the CLG to input into the detailed design and requirement discharge process. Furthermore, it should operate during pre-construction, construction and for a period of 5 years during operation, subject to annual review and agreement of participants. The CLG should be re-established in advance of replacement and decommissioning activities.	The Applicant updated the **Draft DCO [REP7-007]** at Deadline 7 to include a requirement for the terms of reference for the community liaison group to be substantially in accordance with the Outline Terms of Reference. The **Outline Terms of Reference for the Community Liaison Group [REP7-133]** have been drafted with input from Wiltshire Council and Stop Lime Down and currently includes a provision that, prior to the first anniversary of the date of final commissioning of the Scheme, the CLG can discuss and agree whether it is appropriate and proportionate for the CLG to continue in operation in order to facilitate positive and constructive relationships with local communities and stakeholders for a further period of 12 months from the first anniversary of the date of final commissioning of the Scheme. The Applicant considers that provides a reasonable and proportionate period for the CLG to remain in place over the	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			start of the Operational Phase. The Applicant notes that there are already mechanisms within the **Outline OEMP [REP7-075]** and **Outline DS [REP7-077]** to facilitate the re-establishment of the CLG during replacement and decommissioning activities.	
3.2.8	Draft DCO – Requirement 12 Archaeology	WCAS have held extensive discussions with the applicant's archaeological consultants regarding the Archaeological Mitigation Strategy. To date the consultants have prepared an Outline Archaeological Mitigation Strategy (OAMS), which has been approved by WCAS, however, WCAS required a Detailed Archaeological Mitigation Strategy (DAMS) to be prepared prior to the submission and determination of the application. Following extensive talks, the applicant has refused to commit to providing a DAMS, prior to, or even after submission.	The Applicant does not consider it necessary to include a requirement to submit a detailed archaeological strategy for approval as sufficient information is already provided in the **Outline Archaeological Mitigation Strategy [REP7-056]** and consistent with the level of detail that is widely accepted on other made solar DCOs. See Reference 3.8.7 below for further information. The Applicant has made further updates to the **Outline Archaeological Mitigation Strategy [REP7-056]** at Deadline 7 to address comments from both Historic England and Wiltshire Council, incorporating further detail in response to comments provided.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		As a result of this, the Council consider that the wording of Requirement 12 section (2) should be altered to state: *'No part of the authorised development is to commence until the developer implements an approved Detailed Archaeological Mitigation Strategy (DAMS) to cover the scheme area, including the cable route and any associated infrastructure. This will be approved by the local planning authority's archaeological advisors, in consultation with Historic England.* *Any written scheme of investigation for archaeological mitigation submitted under paragraph (2) must be in accordance with the Detailed Archaeological Mitigation Strategy and take into account the final design of the authorised development'*		
3.2.9	Draft DCO – Requirement 13 Permitted Preliminary Works	The council continues to maintain that the current Permitted Preliminary Works Environmental Management Plan [REP5-106] should be considered an outline plan, and that the detailed	The Applicant maintains that the **Permitted Preliminary Works Environmental Management Plan (PPWEMP) [REP7-113]** is a final, detailed management plan, not an	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
	Environmental Management Plan and Schedule 13	Plan should be submitted to the local planning authority for approval prior to any works being undertaken. The council considers that the PPWEMP should become a Requirement in its own right, and therefore Requirement 13(1) should be deleted and / or substantially amended. Schedule 13 should be amended to reference that the PPEMP is an outline document.	outline document, which contains the controls required for permitted preliminary works to proceed while the other outline management plans are being discharged. The PPWEMP is already secured through Requirement 13, which requires permitted preliminary works to be carried out in accordance with it. The Applicant therefore does not consider that a standalone Requirement is necessary, nor that Requirement 13(1) requires deletion or substantial amendment, nor that Schedule 13 should be amended to describe the PPWEMP as an outline document.	
3.2.10	Draft DCO – Requirement 20 Decommissioning	As stated within its response to ExQ2 DCO2.1 [REP5-112] and at ISH9, the council continues to contend that a provision must be included within Requirement 20 for the undertaker to formally submit to the LPA that all decommissioning activities have been completed for the council's approval and confirmation.	The Applicant maintains its position that the existing controls within Requirement 20 are sufficient. The decommissioning plan must be submitted to and approved by the relevant planning authority, must include an implementation timetable, must be implemented as approved, and requires quarterly monitoring reports and a completion report to be submitted to the planning authority.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			The Applicant considers these provisions to be equivalent to a formal completion mechanism, and that any failure to decommission in accordance with the approved timetable would be enforceable under the Planning Act 2008. A separate formal completion submission requiring the Council's approval and confirmation is therefore not considered necessary and no amendment to Requirement 20 is required.	
3.2.11	Draft DCO – Schedule 12 (Part 3)	It is the council's understanding that TPO07 will be added to Part 3 of Schedule 12 of the dDCO to provide consistency with N/TPO08.	The Applicant confirms that Schedule 12 of the draft Development Consent Order submitted at Deadline 7 has been updated to include TPO07.	**Agreed**
3.2.12	Draft DCO – Schedule 16	The council's position remains unchanged since its response to ExQ2 DCO 2.1 [REP5-112] as set out at ISH9. The period for discharge applications should be twelve weeks and not the ten weeks currently specified in 2(2). Furthermore, the council considers that the period for requesting further information should be extended to 20 working days in 3(2),	Please refer to WCD1-032 in the **Applicant's Response to Submissions Received at Deadline 2 [REP3-129].** The Applicant considers ten weeks to be appropriate for the Council to determine an application. It also considers 15 working days to be an appropriate timescale to request further information, noting that it is in the Applicant's interests to	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		which would be in line with the Mallard Pass Solar Farm DCO. The following wording should also be included against each numerical charge within Clause 5 to state "*or the fees applicable at the time of application by the Applicant*". This is due to the extended period in which applications for discharge will be made given the scheme's stated operational life of 60 years.	collaborate with the Council before formally submitting an application to discharge a Requirement in order to maximise the likelihood of the application being approved.	
3.2.13	Community benefits	Wiltshire Council is requesting amendments to the draft DCO and further details on the proposed Community Benefit Fund, including its total value, administration, and project eligibility criteria. The Council emphasizes that, given the scale of the development, the Fund must provide meaningful benefits to the affected local community if consent is granted.	With respect to the Community Benefit Fund, the Applicant is committed to engagement with Wiltshire Council as a key stakeholder to ensure that the funding proposed is best utilised. The Applicant confirms however that discussions and agreements made on the Community Benefit Fund are separate from the DCO process.	**Not Agreed**
3.2.14	Book of Reference and dDCO Land Rights and	Throughout the course of the examination, the Applicant has updated the Book of Reference. As a result, the council is not seeking any outstanding amendments or new matters in relation	Schedule 9 (Land in which only new rights etc. may be acquired) and Schedule 11 (Land of which temporary possession may be taken) to the **Draft DCO [REP7-007]** list the specific plot	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
	Acquisition Powers	to the Plots identified as Wiltshire Council having an interest in. There is a slight discrepancy regarding SHER18, however the council's interest is stated to be "in respect of public footpath (SHER18)" only. Any works or temporary access requirements will be addressed through the DCO negotiations.	numbers against the rights sought (both permanent and temporary respectively). In respect of Wiltshire Council's concerns in relation to highway works, the Applicant have now agreed the form of Protective Provisions for the protection of Wiltshire Council in its capacity as local highway authority. The agreed form of Protective Provisions will be contained within Schedule 15 (Protective Provisions) to the **Draft DCO [REP7-007]** submitted at Deadline 7.	
3.2.15	Consistent approach to monitoring	Wiltshire Council have requested clarification on how monitoring will be implemented in relation to a number of management plans and topics. The Council's position is that the parties should enter into a Section 106 agreement to provide certainty of payment of monitoring costs for the scheme. The drafting of the S106 has been agreed between the Applicant and Wiltshire Council and an update will be provided at Deadline 8.	Wiltshire Council has requested clarification regarding the implementation of monitoring across a number of management plans and environmental topics. The Applicant's position is that monitoring itself is appropriately secured through the **Draft DCO [REP7-007]** and the relevant management plans. Schedule 2 of the Draft DCO requires the submission and approval of the final management plans	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Discussions are ongoing with respect to a further PPA.	by Wiltshire Council (following consultation with relevant consultees where required) and requires the authorised development to be carried out in accordance with those approved plans. The outline management plans already identify monitoring requirements proportionate to the relevant topic, including, where appropriate, inspection regimes, environmental monitoring, reporting, review mechanisms and corrective actions. These arrangements will be developed and agreed with Wiltshire Council through the approval of the final management plans prior to the relevant phase of development commencing. The Applicant has agreed with Wiltshire Council that the mechanism for monetary contributions for mitigation and monitoring work will be through a s106 agreement, and that the agreed approach to monitoring contributions will include an index linking mechanism. A **Draft S106 Agreement [EN010168/EXAM/9.93]** has been	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			provided at Deadline 8 and once this has been finalised it will be submitted to the Secretary of State.	

3.3 Climate Change and Energy Needs

Table 3-3: Climate Change and Energy Needs

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.3.1	Legislation and Policy	Wiltshire Council provided no comment on the Legislation and Policy applied for the Climate Change assessment. The Applicant considers that Section 7.3 of **ES Volume 1, Chapter 7: Climate Change [REP5-022]** has identified and appropriately considered all applicable legislation and policy.	The Applicant considers that Section 7.3 of **ES Volume 1, Chapter 7: Climate Change [REP7-019]** has identified and appropriately considered all applicable legislation and policy.	**Agreed**
3.3.2	Transparency	Wiltshire Council notes that, while the project is expected to deliver significant lifetime carbon savings, the timing of emissions remains an important consideration. A substantial proportion of emissions will occur during the construction phase, at a time when the UK is seeking to reduce emissions to meet its net-zero targets. The council felt that the assessment did not clearly explain that the project will increase carbon emissions in the short to medium term in order to achieve longer-term emissions reductions. These impacts should be	The methodology adopted within Section 7.6 of **ES Volume 1, Chapter 7: Climate Change [REP7-019]** has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable. Specifically, the comparison against UK carbon budgets is agreed as appropriate. Section 6 of the **Climate Response to Wiltshire Council Appendix B of Written Representation and SLD Appendix J1 [REP3-132]** clarifies the benefits vs	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		transparently presented and considered as part of the decision-making process. The Council acknowledges that national policy supports large-scale renewable energy developments, despite their associated construction emissions during the 4th and 5th carbon budget periods. The purpose of such developments is to generate clean electricity and support the wider decarbonisation of sectors such as heating and transport. The Council considers that this context should be communicated more clearly within Chapter 7 (Climate Change) of the Environmental Statement, particularly in recognising that large renewable energy developments are, in the short term, carbon-emitting construction projects. The Council acknowledges the additional information provided in the Climate Response to Wiltshire Council, Appendix B of the Written Representation, and SLD Appendix J1	impacts and the comparison with the carbon budgets. **ES Volume 1, Chapter 7: Climate Change [REP5-022] (Revision 2)** was revised and updated at Deadline 5 to further clarify emission calculations. Additional text has been incorporated into **ES Volume 1, Chapter 7: Climate Change [REP7-019]** (paragraph 7.10.51) to confirm that it is appropriate to compare against the national UK Carbon budget. The text also emphasises that, although a relatively high level of greenhouse gas emissions are associated with the construction phase when considered in isolation, the construction of the Scheme will facilitate the generation of renewable electricity over its operational lifetime.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		[REP3-132]. It also welcomes the amendments made to ES Chapter 7: Climate Change (Rev 2) [REP5-022] and considers that this provides greater transparency in terms of the national carbon budgets, national policy context and need for renewables.		
3.3.3	Methodology	While the scheme's average carbon intensity is lower than that of the grid and would help reduce grid emissions, Wiltshire Council are concerned that this assessment does not fully account for upstream and downstream emissions from construction, maintenance, and decommissioning. These lifetime emissions are significant, and the council considers they should be acknowledged and weighed in decision-making and reduced as much as possible. This issue was identified in the review by University of Exeter of the methodology and assumptions used in the carbon assessment. The Council acknowledges the Applicant's response to these points, set out in the Climate	The Applicant has built upon the existing text within the **Outline OEMP [REP7-075]** at Deadline 7the text now reads: *"The Operator shall maintain appropriate corporate governance, procurement and supplier management procedures throughout the operational lifetime of the Scheme. Where practicable, suppliers and contractors engaged in the operation and maintenance of the Scheme shall be required to comply with the Operator's relevant policies and procedures relating to carbon emissions, environmental, social and ethical business practices".* This outlines the mechanism by which the emissions will be mitigated.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Response to Wiltshire Council, Appendix B of the Written Representation and Stop Lime Down Appendix J1 [REP3-132], and welcomes the amendments made to ES Volume 1, Chapter 7: Climate Change [REP5-022] in the interests of transparency. However, the Council and the Applicant are unlikely to reach full agreement on the methodology or emissions estimates, as different approaches can reasonably produce different results. The University of Exeter review indicates that some queries and potential inaccuracies remain unresolved, as noted in the Council's Comments on Submissions Received at Deadline 3. The Council acknowledges the Applicant's position that its assessment is proportionate and that the carbon assessment will not be revisited in depth. As a result, agreement on the methodology and emissions estimates is unlikely to be reached.	**ES Volume 1, Chapter 7: Climate Change [REP5-022] (Revision 2)** was revised and updated at Deadline 5 to further clarify emission calculations	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Regardless of the methodology used, the Environmental Statement provides only an estimate of greenhouse gas emissions. The Council's primary concern is therefore not the precise emissions figure, but how emissions will be mitigated in practice. Throughout the life of the project, improved data on actual emissions can be used to refine and strengthen mitigation measures. Effective mitigation will be delivered primarily through the project's management plans and procurement processes, as discussed in Sections 3.3.5 and 3.3.6.		
3.3.4	Strategic plan / principle of development / strategic location	The council accepts that the need for large infrastructure projects to generate renewable energy is established through national policy, including the fact that a significant amount of emissions will be produced during the 4th and 5th carbon budget. The council remains concerned that in the absence of a Strategic Spatial Energy Plan, the strategic location for such large renewable infrastructure projects is not	The Applicant notes this comment.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		clear, including whether Wiltshire is the right strategic location. While the Climate Change Committee papers make it clear that the power sector will create excess emissions (no savings) during the period of the 4th carbon budget, due to the need for construction of renewable energy developments, it is not clear whether this Scheme at this location is an efficient and strategic 'use' of those carbon budgets. It is not clear how the Secretary of State will decide this in the absence of a national Strategic Spatial Energy Plan (SSEP). "*The SSEP will support a more actively planned approach to energy infrastructure across England, Scotland and Wales, land and sea between 2030 to 2050. It will do this by assessing and identifying the optimal locations, quantities and types of energy infrastructure required for generation and storage, as well as relevant hydrogen assets, for GB, to meet our future energy demand with the clean, affordable and secure supply*		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		that we need. The first iteration will be published by NESO before the end of 2026. It will be in line with the power sector's effort share for CB6." (Carbon budget and growth delivery plan (Section 14 Report) p206) The council accepts that the applicant cannot address this issue through its proposal and DCO: it is a matter for the secretary of state to be comfortable with. Not Agreed as the council disputes that this is the correct location for such a large scale energy project given the environmental sensitivities and adverse impacts.		
3.3.5	Assessment Results	Wiltshire Council acknowledges that the methodology follows guidance that the appropriate approach is to consider the scheme's emissions in the context of UK carbon budgets as they are considered to be inherently cumulative. This results in a statement that the impacts are 'low'. The council's view that a simple statement that the emissions are low, without context, is	The assessment results set out within Section 7.10 of **ES Volume 1, Chapter 7: Climate Change [REP7-019]** including likely significant effects anticipated, are acceptable. Section 2 of the **Climate Response to Wiltshire Council Appendix B of Written Representation and Stop Lime Down Appendix J1 [REP3-132]** clarifies the emission calculations.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		not transparent. The emissions are clearly going to be low when compared with the carbon budget for the entire country. It should be made clear that this is the context when stating the conclusion, and whilst the greenhouse gas emissions impact is considered low in this context. Wiltshire Council acknowledges the changes made to paragraph 7.10.51 at deadline 7. However, the main point should be made that whatever the context, the carbon emissions are substantial, and the carbon assessment and Environmental Statement should aid the Applicant in identifying the key areas of emissions, and putting in place measures to avoid and mitigate them as much as possible. Wiltshire Council's review of the submitted figures in ES Volume 1: Chapter 7 (carried out by University of Exeter) show that greenhouse gas emissions are substantial. Therefore, the council would like to see the clear conclusion drawn in the ES	**ES Volume 1, Chapter 7: Climate Change [REP5-022] (Revision 2)** was revised and updated at Deadline 5 to further clarify emission calculations It should be noted that the assessment provided is conservative and provides a reasonable worst case. In the absence of detailed plans assumptions have been applied to avoid the underestimation of emissions e.g. sourcing and transport of panels.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		that there are a substantial amount of emissions produced, especially during the construction phase of the project and that these should be avoided and mitigated as much as possible, with specific measures identified through management plans, material and equipment specifications and the procurement process. Whilst the **ES Volume 1, Chapter 7: Climate Change [REP5-022]** now makes the context of the carbon budgets clearer, and acknowledges that carbon emissions will be substantial, the overall conclusion is the residual significant effects associated with GHG emissions will be low / completely offset. Therefore, the conclusion still completely misses the point that there are substantial greenhouse gas emissions and they should be mitigated. The council's position is that it is still possible to draw a conclusion that there are overall net benefits of the scheme, as well as there being		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		substantial greenhouse gas emissions produced that can be mitigated. For example, a highways scheme is classed as a high carbon project – it's purpose it to enable people and goods to travel around. A renewable energy project is a carbon-emitting construction project with the purpose of decarbonising the grid and enabling a wider transition to a clean energy system. Whatever the purpose of the construction project, it is still possible to identify the main sources of emissions and avoid or reduce them as much as possible. It is not acceptable to say that just because a scheme has a wider decarbonisation impact, that its impact and emissions associated with construction, operation, maintenance and decommissioning are negligible or do not need addressing.		
3.3.6	Mitigation / Management Plans	Wiltshire Council requested that mitigation listed for GHG emissions must include measures to reduce emissions as much as the current technology allows, and project planning	Measures to mitigate the emissions during each phase of the Scheme are included in the **Outline CEMP [REP7-073], Outline OEMP [REP7-075]** and **Outline Decommissioning Strategy [REP7-077]** respectively. These	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		must be flexible enough to allow for future innovations. Wiltshire Council accepts that this has been addressed through references in the draft DCO to the management plans, and through amendments to the respective outline management plans to ensure this is secured should the DCO be consented. However, the Outline Management Plans are high level, and therefore it is important that the detail is included in subsequent full, detailed management plans. Wiltshire Council acknowledges the amendments made in the management plans to address specific mitigation measures in relation to low carbon forms of transport, rain runoff, and sustainable procurement. The council is accepting of this approach – to mention mitigation measures at a high level, and to add specifics through later detailed management plans. The ExA has asked for additional updates relating to procurement process and how the applicant will demonstrate it achieves the necessary	management plans will be developed into detailed documents and secured via requirements as set out in the **Draft DCO [REP7-007]**.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		mitigation, in terms of carbon reduction, through the procurement process. Following subsequent discussion via e-mail between the Applicant and Wiltshire Council, the following has been added to the Outline OEMP at Deadline 7 "*"The Operator shall maintain appropriate corporate governance, procurement and supplier management procedures throughout the operational lifetime of the Scheme. Where practicable, suppliers and contractors engaged in the operation and maintenance of the Scheme shall be required to comply with the Operator's relevant policies and procedures relating to carbon emissions, environmental, social and ethical business practices".* Wiltshire Council accepts this addition to the Outline OEMP. However, it does not provide detail of how sustainable procurement will be carried out, or what the Operator's relevant policies and procedures are (as the Operator is not known), so the further detail would be expected in the		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		full detailed OEMP, as it is one of the main ways that the Scheme's actual carbon emissions can be fully understood and mitigated. As the Operator is not know, the reliance on their policies and practices is not acceptable. Certain standards for supply chain, procurement and carbon emissions should be set out in detail, to guide the Operator's practices. This should be based on the key sources of carbon emissions identified in the Environmental Statement, and linked to the areas of mitigation set out in the outline management plans, with any specific targets included. The council queries why the same amendments were not made to the Outline CEMP.		

3.4 Landscape and Visual

Table 3-4: Landscape and Visual

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.4.1	Development Plan Policy	The Council considers that the proposal does not and could not comply with the requirements of Wiltshire Core Strategy, Core Policy 51 (Landscape), due to the Location, scale, nature and magnitude of change over such a large protracted area adjacent to, and within the setting of the CNL (Lime Down Areas A, B & C). The application does not demonstrate satisfactory consideration of cumulative landscape and visual effects, or satisfactory resolution of factor (i) 'The Landscape, particularly in and around AONB's' as required by Core Policy 42 (Standalone renewable energy installations). The Council does not agree the applicant has demonstrated that the scheme complies with Core Policy 42 or Core Policy 51 of the Wiltshire Core Strategy.	The Applicant has demonstrated how the Scheme complies with Core Policy 42 and Core Policy 51 in pages 668 to 683 and pages 687 to 692 of Annex B: Local Policy Accordance Tables of the **Planning Statement [REP7-064]**.	**Not Agreed**
3.4.2	Visual Considerations	The representative photo viewpoints to be assessed were agreed with the	The Applicant recognises and welcomes the Wiltshire Council's	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Wiltshire Council landscape officer and CNL. Despite its very large size in a generally small-scale and intimate landscape, much of the proposed development is relatively well-contained visually from the wider landscape.	position on the agreement of viewpoint locations. It is agreed that much of the proposed development is relatively well-contained visually from the wider landscape due to the small-scale intimate character of the landscape.	
3.4.3	Viewpoint Photographs	The photography undertaken is good. However, the interpretation of the results and the presentation of relevant information is poor and is difficult to interpret. The notation on the viewpoint photographs is very sparse and includes nothing more than a rough indication of potential visibility of the site. For the orientation of the reader and to enable a proper assessment of visual effects to be undertaken, the following information is required and would normally be provided: PRoW and road locations and any the relevant information and key features (e.g. Landscape features, prominent built form, woodland, identification of panel	The Photography has been undertaken in accordance with Landscape Institute TGN06/19 requirements. The Applicant has provided the additional annotation to the viewpoint photographs to include the key features and information as suggested to help orientate the reader. **ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [REP2-010 to REP2-011 and REP5-044]** has been revised to accommodate additional annotation. The request to identify panel fields, substations and BESS locations did not form part of the original request.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		fields, substations and BESS locations etc.) While the Council notes the Applicant's intention to include annotation on submitted viewpoint photographs, it should have been included within the ES submission as part of the initial application, rather than at Deadline 1. The Council recognises the addition of some key landscape features now labelled on baseline photography and photo-montages, but comments that this is still not that helpful to understand which fields are PV fields or fields with substations for many of these photo-viewpoints etc. The Council considers that including labels to aid identification of panel fields, substations and BESS locations on the submitted viewpoint photography to be fundamental and an obvious requirement to help orientate the reader's/reviewer's understanding of the significance of visual changes likely to be experienced by receptors.		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.4.4	ZTVs	Wiltshire Council believe the ZTV methodology is inadequate for complexity of the Project due to its limited scope, lack of detailed structural considerations, and failure to comprehensively analyse visibility impacts across sites, for example, relying initially on a limited bare-earth assessment, failing to specify structure heights or visibility assumptions, and not clearly assessing or combining the tallest elements across sites. The Council does not agree with the Applicant's position and has consistently raised the cumulative ZTV methodology and lack of landscape ZoI justification as an issue of concern. No further comment required, matter not agreed.	The ZTV Methodology is set out in Section 4 of **ES Volume 3, Appendix 8-1: Landscape and Visual Impact Assessment Methodology [REP5-067]**, the Bare Earth ZTVs are shown on **ES Volume 2, Figure 8-8 to 8-8-13 Bare Earth Zone of Theoretical Visibility (ZTV) [APP-097]** and the Augmented ZTVs are shown on **ES Volume 2, Figure 8-9 to 8-9-13: Augmented ZTV [APP-098]**. The ZTV methodology has been consistent from Scoping and the LPA have had opportunity throughout the ongoing consultation to respond. The ZTV methodology applied is appropriate and sufficient for the assessment.	**Not Agreed**
3.4.5	Landscape ZoI	No justification included within Chapter 8 or its supporting Volume 3 appendices to justify ZoI extents for the purpose of Landscape or Visual cumulative assessment. ES Vol 1, Chapter 21, Table 21-3 (2nd row) - The applicant states "In	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	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		agreement with Wiltshire Council, the study area for the cumulative assessment was extended to 10km to consider the wider cumulative effects of solar development on the landscape". At no point has Wiltshire Council agreed or accepted that the revised 10km study area (extended from an initial 1km study area) forms an appropriate basis for the applicant's assessment of potential cumulative landscape effects i.e. for landscape character type 'Limestone lowland' and associated landscape character areas. Wiltshire Council's feedback and formal responses have consistently raised concern over this issue. The information included within the final DCO submission, confirms that the ZoI has been established on the basis of potential visibility. This does not appropriately reflect the scale, magnitude or temporal scope of cumulative landscape change to the receiving **landscape** character type from solar PV and BESS developments cumulatively impacting countryside at	often many layers of vegetation or other features across the landscape that are not captured by the ZTV modelling that could affect visibility. The ZTV's 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 consulted with WC on the Methodology **[REP1A-006]** used within the LVIA and adjusted accordingly prior to the submission of the DCO application to accommodate requests from WC, such as an extension of the Study Area for Cumulative Assessment to 10km. The Applicant maintains its position on this matter and directs to its findings contained within **ES Volume 1 Chapter 8: Landscape and Visual**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the 'landscape character type' and 'landscape character area' scale. Issue remains in relation to creeping baseline syndrome. The concern about this landscape character type and associated landscape character area/s of North & West Wiltshire incrementally turning into a new solar / BESS landscape is a clear trend that has been previously highlighted to the applicant. It is appreciated that Cumulative Assessment is complex, and needs to be proportionate to the task in hand, but the cumulative assessment should appropriately consider the scale, nature and temporal scope of existing operational solar / BESS development as part of Dynamic Baseline considerations, alongside the other solar PV and BESS developments with planning consent and currently in planning, otherwise the creeping baseline scenario will lead to under reporting of assessed effects in relation to the overall significance of cumulative change to landscape character.	**[REP6B-004]**; assessment of effects on the individual **Landscape Character Types [REP6B-008]**; **Technical Note on Cumulative Sequential Visual Effects [REP1-123]**; and **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]**, which do not identify any adverse significant effects associated with the Scheme and any of the Cumulative Development Sites. The Applicant has sought to provide clarity where requested and provide additional information or assessment when requested. The Applicant has produced additional technical notes containing additional assessments as requested by both WC, the CNLB and the ExA. The Applicant recognises the Councils concerns but stands by the approach and findings undertaken within these assessments and being robust and in accordance with appropriate guidance.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council has already reviewed the various additional submissions, clarifications and submitted Technical Notes referenced by the applicant; **[REP1-122]**, **[REP1-123]**, **[REP3-025]** and **[REP5-103]** within its formal responses and maintains that these assessments and findings do not constitute a robust assessment of cumulative effects for landscape character.		
3.4.6	Assessment Methodology	The LVIA methodology follows standard best practice (GLVIA 3) and is set out in a separate appendix.	The methodology adopted within section 8.7 of the **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** and **ES Chapter 8 Appendix 8-1 LVIA Methodology [REP5-067]** follows the 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3) and derived from consultation and engagement with stakeholders and by reviewing relevant guidance and studies and is considered acceptable to fully understand the extent of effects associated with the Development.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.4.7	Application of Assessment Methodology	The LVIA assessment outputs are unclear, sometimes inaccurate or incomplete, and lack transparency. This issue has been consistently raised by the Council. The council has considered the technical note within its written response to ExA's first written questions [ExQ1] -LV1.2 at pages 35-37 [REP3-142]. Its content does not alter the council's view. The council further highlights that the Technical Note appears to contradict itself at paras 3.1.9 and 3.1.10. The Council fundamentally disagrees that the physical changes to landscape components (fabric) have been fully and therefore robustly assessed, or considered separately from the applicant's wider considerations and assessment of character. In this regard the Council maintains its position that the applicant's assessment of landscape fabric represents a partial and incomplete assessment of physical landscape components, which in the	The Applicant maintains its position that the assessment is accurate and complete, but to assist the Council a technical note to clarify how landscape fabric and landscape character is considered within the assessment has been provided at Deadline 1 in **9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]**. No changes are proposed to the assessment methodology and this technical note is intended to provide clarification regarding Wiltshire Council's concerns surrounding the application of the methodology. The Applicant does not agree that there is a contradiction between paragraphs 3.1.9 and 3.1.10 of the **9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]** and considers that these explain the consideration and landscape character and fabric within **ES Volume 1, Chapter 8 Landscape and Visual [REP6B-004].**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Council's view departs from the applicant's stated methodology.		
3.4.8	Embedded Design Mitigation	Embedded mitigation, such as layout changes, buffer strips, and landscape design parameters, is intended to reduce negative impacts and enhance the project. However, because the baseline landscape fabric has not been properly assessed, these measures may inadvertently harm the landscape, and it is unclear which measures are genuine enhancements versus mitigation. The LVIA findings should not be relied on to inform decision-making. (see comments under 3.4.7) It is the Councils view that the scheme has not avoided adverse effects on sensitive areas, particularly the setting of the CNL. There is outstanding disagreement between parties over what comprises the setting of the CNL. The council has reviewed the Applicant's **Technical Note on Landscape Fabric and Landscape**	The approach and proposals for embedded mitigation set out within Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**, considers the landscape and visual matters associated with the Scheme as part of an iterative process, and is considered appropriate. Following the mitigation hierarchy, the layout of the proposals within the Order Limits have been developed to avoid adverse effects on sensitive areas, reducing negative / adverse effects of the Scheme on visual amenity and landscape character. Landscape mitigation has been used throughout the Scheme to further reduce adverse effects associated with the development. Enhancement measures are included within the Scheme for land within the setting of the CNL to further the purposes of the CNL. This is expanded on in **ES Volume 3, Appendix 8-6:**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Character [REP1-121] which does not provide any further clarification or comfort to the Council or address the Council's previously raised concerns regarding the application of the methodology. The stated avoidance measures • Avoiding development adjacent to the National Landscape where it would affect its setting; and • Avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. The scheme does not avoid harms to the CNL. Views to and from the CNL are not maintained by the scheme's visual mitigation strategy, which proposes universal physical changes to existing hedgerow fabric components by increasing the height of maintained hedgerows, with the notable exception along Alderton Road, where hedgerows will be managed close to existing hedgerow heights of 1.5m along the western edges of fields C1,	**Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]**. As noted previously the effects on landscape fabric and landscape character are assessed separately. A technical note to clarify how landscape fabric and landscape character is considered within the assessment has been provided at Deadline 1 in **9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]**. This technical note is intended to provide clarification regarding Wiltshire Council's concerns surrounding the application of the methodology. Due to the Scheme's location on the edge of the Cotswold National Landscape (CNL) avoidance measures have been incorporated into the Scheme Design as part of the Mitigation Hierarchy as set out in Section 8.9 of the **LVIA [REP6B-004]**. This includes: • Avoiding development adjacent to the National Landscape where it would affect its setting; and	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		C6, C8, C9 and C10 in Lime Down site C. While the proposed enhancement measures are welcomed by the Council, the Council still considers that many of these proposed landscape enhancement measures, overlap with necessary mitigation requirements for breeding birds, and as visual mitigation and a great deal of uncertainty remains as to which if any enhancement measures will remain at the point of decommissioning. The council maintains its concerns regarding the appropriateness of the visual mitigation proposed, including formal hedgerow management at 4-5m heights, creation of double width hedgerows to increase visual screening/filtering functions for this commercial scale new land use and its introduced visually discordant scheme components, such as panel fields, new internal access tracks and substations.	• Avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. Areas within the setting of the CNL have been specifically targeted for positive enhancement to further the purposes of the CNL. The creation of wildflower meadows and margins as well as areas of scrub and new hedgerows as set out within the LEMP are proposed in Fields A1, A11 and A12, B12, C1, C6, C8, C9 and the majority of C10. These features would be visible in Site C where hedgerows on the boundary with the CNL are to be managed at their current height of c1.5m. These measures are distinct enhancement measures which have been informed by consultation with the CNLB, the CNL Management Plan and Nature Recovery Strategy and are considered to beneficial landscape improvements which further the purposes of the CNL designation. These measures have been included to prevent harm to the CNL and as identified above, to provide	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			opportunities for positive enhancement within the setting of the CNL. This enhancement has been confirmed by the CNLB in their **Comments on any other submissions received at deadline 2 [REP3-154].** The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative 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 Wiltshire Ccouncil. 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. Embedded mitigation includes: • Avoidance - Avoidance measures to avoid harm to the CNL through the use	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			of significant buffers to the CNL boundary where Sites A, B and C are within its setting and to maintain views to and from the CNL such as Alderton and Sherston Church; • Protection – Buffers and offsets have been embedded into the design of the Scheme to protect the existing landscape fabric of the Sites within the setting of the CNL (and throughout the wider Scheme); • Retention and Enhancement - Retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits, This includes the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			stone walls and creation of new ponds; and • Positive Enhancements – Positive enhancements to further the purpose of the CNL are incorporated into the Scheme, particularly within avoidance areas. This includes: − The creation of wildflower meadows and scrub on the edge of the CNL within Fields A1, C1, C6, C8, C9 and B12. − The creation 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 on the edge of 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. 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	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			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 in the **Limestone Lowlands Character Assessment [REP5-103]** which provides greater detail and clarity on this distinction. Within the setting of the CNL, 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	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			effects associated with the proposed enhancement measures proposed along the western extents of the Scheme within the setting of the CNL, which in 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.	
3.4.9	Embedded Mitigation	Low hedgerows currently allow for longer views and appreciation of the wider landscape, which would be impacted by the visual mitigation strategy.	The LVIA recognises where longer views and appreciation of the wider landscape, would be impacted by the visual mitigation strategy. The proposed mitigation planting is set out in the **Outline LEMP [REP7-081]** and includes for substantial areas of new	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Double width hedgerows and lines of regularly spaced trees are not representative fabric components of the receiving local landscape. The council maintains its position that physical changes to the limited number of fabric components actually included within the Assessment of landscape fabric have not been appropriately or fully considered.	woodland, hedgerow and meadow planting, which once established would provide positive contributions to the countryside in line with the Wiltshire's Nature Recovery Strategy. It is agreed that the mitigation planting, particularly allowing hedgerows to become taller and maintained to a height of up to 4.5m would cause a change in landscape character and loss of longer views over the landscape in some places. This change has been recognised within both the landscape and visual assessments. Hedgerows on the boundary with the CNL are to be managed at their current height of c1.5m to maintain open views to and from the CNL. Measures to mitigate visual effects are set out in the **Outline LEMP [REP7-081]** to be secured through Requirement 7 in Schedule 2 to the **Draft DCO [REP7-007]**. However, it is noted that not all of Wiltshire's hedgerows are maintained to a low height and this change would not be significant or permanent as	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			hedgerows could be clipped low again following decommissioning.	
3.4.10	Landscape and Ecological Management Plan	The draft DCO requires submission of a Landscape and Ecology Mitigation and Enhancement Plan and a LEMP setting out details for future maintenance, monitoring and management of the scheme for LPA approval, both of which may be refined under the Rochdale Envelope principles. At present the scheme and the landscape proposals are considered too vague to agree this and the council lacks confidence as to the appropriate detail of the proposals, notably in relation to establishment and efficacy of landscape planting, and adaptive management during the operational lifetime of the Scheme. The Council maintains its position.	The detailed landscape proposals will consist of the area and extent of the Scheme shown on **ES Volume 2, Figure 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plan [REP7-034 to REP7-037].** The **Outline LEMP [REP7-081]** is secured by Requirement 7 of Schedule 2 of **Draft DCO [REP7-007].**	**Not Agreed**
3.4.11	Landscape and Ecological Management	The ES's current Landscape and Ecology Mitigation and Enhancement Plan/s will likely need updating,	The landscape and ecological improvements are set out in the **ES Volume 2, 3-4-1 to 3-4-5.2:**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
	Plan: Landscape and Ecological Improvements	following further refinement of the scheme, and the DCO should ensure these plans are coordinated, along with Requirement 9 on 10% BNG, to avoid conflicts and provide a clear framework for future enforcement and monitoring. The outline LEMP and the Landscape and Ecology Mitigation and Enhancement Plans provide a broad framework for final documents but lack sufficient detailed site considerations or certainty to be agreeable at present. The final LEMP must include site-specific prescriptions for Sites A–E and the CRC, linked to clear plans showing spatial arrangements of features and management, ensuring mitigation identified in the LVIA is delivered. The CRC should be included with a potentially shorter-term LEMP, and site-specific grouping is recommended for clarity and practical use. It is acknowledged and welcomed that the Applicant agrees that a final detailed LEMP for the scheme will include the CRC.	**Landscape and Ecology Mitigation Plan [REP7-034 to REP7-037]**. The **Outline LEMP [REP7-081]** are considered acceptable and is secured by Requirement 7 of Schedule 2 of **Draft DCO [REP7-007].** Following further development of the Scheme, more detailed planting plans including detail of areas of landscape mitigation, location and types of planting (species), as well as number, density and specification will be provided prior to any works commencing. The Final LEMP for the Scheme will include site-specific prescriptions for Sites A–E and the CRC as required, to ensure the mitigation proposals are delivered. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [REP7-081]**, is secured through Requirement 7 in Schedule 2 of the Draft **DCO [REP7-007]**.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		It is agreed that following further development of the scheme, more detailed planting plans including detail of areas of landscape mitigation, location and types of planting (species), as well as number, density and specification need to be provided and approved prior to any works commencing. The council maintains its position, until a detailed scheme layout is designed, an appropriate scheme of mitigation lacks sufficient detailed site considerations or certainty to be agreeable at present.		
3.4.12	Landscape and Ecological Improvements	The Council does not agree that this could be viewed as a landscape led scheme due to the scale and contrasting nature of the development proposed and the resulting changes to the character and visual and recreational amenity value of the baseline landscape within the setting of the CNL.	The Scheme has been Landscape-led meaning that the landscape itself has been treated as the starting point for the project rather than simply finding space for panels and then mitigating impacts afterwards. The Project Landscape Architect has been engaged on the design of the project from the outset and is identified as the 'Design Champion' for the proposal.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		There are concerns that some essential mitigation measures necessary to address ecological harm are being presented and possibly double counted as landscape enhancements, without adequately acknowledging the harm they aim to mitigate or compensate for. This could potentially affect the assessment scores. Such considerations are relevant to the evaluation of positive environmental enhancement within the overall planning balance. It is the Council's view that if the Applicant is referencing ecological enhancement as a positive landscape effect within the LVIA, the assessment should be consistent and transparent and therefore also acknowledge that where there is assessed ecological harm, this could represent a negative landscape effect within the LVIA. The Council stands by its comments, noting that this is the first time the applicant has referred to the solar infrastructure as a new component	The landscape-led approach began with a review of the capacity of the landscape to accommodate large scale ground mounted solar development. This lead to an assessment of: • Existing landscape character. • Landform and topography. • Landscape receptors, • Visual receptors and Visual sensitivity. • Settlement pattern and local identity • Public rights of way. • Historic landscape features (supported through consultation with the project Heritage and Archaeology Consultants). • Ecological and Habitat (supported through consultation with the project Ecologists). • Watercourses and floodplains (supported through consultation with the project Hydrologists). The process was to then identify where solar infrastructure could sit comfortably within the landscape and	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		introduced into the landscape, which the council considers should have been assessed separately from the outset within its considerations of the **physical change** effects to site areas A to E arising from the scheme, which the assessment still does not consider fully or separately from its wider considerations and assessments of character. As previously highlighted by the Council, the additional technical note on landscape fabric and character **[REP1-121]** does not alleviate the Council's concerns in relation to the conflated assessments of landscape fabric (components) and local character. The Council further considers that the applicant's continual reference to the scheme being landscape led is overstated and not correct. The project has sought to mitigate harmful landscape and visual effects as far as the applicant is prepared to go without compromising the energy generating and storage capacity benefits for this	where land should remain undeveloped. Having identified the existing landscape structure, this was then used to organise the solar layout so that the proposals could be read as a series of landscape compartments integrated into the existing countryside. This was embedded into the design of the scheme through the use of a series of buffers. These are set out within Table 8-9 of the **ES Volume 1 Chapter 8: Landscape and Visual [REP6B-004]**. Infrastructure associated with the Scheme is located outside of the buffers with the exception of internal access tracks where exclusion from the buffers is unavoidable. Buffers include extensive offsets from existing PRoW, retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		very large NSIP scheme, by simply following the established EIA mitigation hierarchy principles of Avoid, Minimise, Replace and Compensate, in so far as it is able without reducing the scheme's renewable energy generating, storage and transfer outputs. It is clear to the Council that embedded mitigation measures which propose managing existing low maintained hedgerows up to 5m high with square faced sides and tops to achieve visual screening, and planting double width hedgerows will generate notable physical changes to the fabric of the sites (A to E) in addition to the introduced solar infrastructure, substation and BESS components, leading to the loss of existing open views, and significantly and adversely impacting receptor's perceptual experiences and sense of place. The applicant considers they have avoided location of infrastructure on elevated land, and breaking skylines, which the Council does not agree. The location of proposed substations in particular is an example where views	establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds. The layout has been designed in consideration of the local landscape character to respond to visual receptors in the area such as residents and local settlements, users of PRoW and popular routes including the Fosse Way, the local road network and the CNL. This has resulted in setbacks from local villages, such as at Alderton, Sherston, Foxley, Norton and Rodbourne, avoidance of infrastructure on elevated land or breaking skylines, retention of open foregrounds along PRoW and surrounding residential properties, strategic planting that is aligned to the Rolling Hullavington Lowlands and the Wiltshire Nature Recovery Strategy. The approach with tall of these	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		from public receptors will see the introduced substation components elevated on local rolling ridges and upper shallow valley sides, while perceptually detracting from important established landscape components such as areas of existing ancient woodland or along riparian corridors. While long-term public access is largely maintained on existing PRoW and additionally supplemented with new permissive routes, the perceptual and experiential / recreational qualities of countryside within and separating Lime Down Areas A to E, will be adversely and significantly impacted for users of many of these rural routes. The Council does not consider that the large areas of arrays with supporting substations and other infrastructure will successfully integrate into this high value sensitive landscape, and that the large, dispersed nature of the site, spreads the adverse effects over a much wider and larger area which physically and visually impacts a greater number of receptors.	elements has been to design a scheme where the visual effects have been inherently reduced, not just mitigated through additional planting. Mitigation planting has been utilised throughout the Scheme, however, it has been brought forward to provide multifunctional landscapes – which in the regard to a large scale ground mounted solar project is through extensive coordination with the project ecologists to ensure biodiversity, habitat creation and enhancements are integrated into the proposals. The Scheme provides new substantial areas of Green Corridor & Woodland Planting, Enhanced Riparian Native Planting, Hedgerow Reinforcement & Reinforced Road side Vegetation, new hedgerows, Proposed Ponds and Wader Scrapes and extensive areas of ground cover provided beneath the arrays and throughout. The CNL has been proactively considered throughout the design process including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds. The layout has considered the Cultural Heritage of the local area as well as historic landscape character, through maintaining views of local churches, landmarks and heritage assets such views of St Gile's Church at Alderton, and the setting of Fosse Lodge on Alderton Road. As a result of the landscape led design development, the areas for the arrays are broken up and separated by substantial areas of agricultural landscape with large areas of land between each of the Sites helping assist with assimilation. The existing field patterns are retained and strengthened. Sensitive land left has been left undeveloped, for example alongside the CNL. Ecological (BNG) and habitat creation at the core of the landscape framework. Public access is maintained and enhanced through	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			additional permissive routes. These all lead to the proposed solar infrastructure appearing as one component within a broader landscape strategy. NPS EN-1 further supports this by recognising at para 5.10.5 "…*there may also be beneficial landscape character impacts arising from mitigation*." A technical note to clarify how landscape fabric and landscape character is considered within the assessment has been submitted at Deadline 1 **[REP1-121].** This technical note is intended to provide clarification regarding the LPA's concerns surrounding the application of the methodology.	
3.4.13	Construction Landscape Assessment results	The LVIA assesses landscape and visual effects across construction, operation, maintenance, and decommissioning, but Wiltshire Council believe the construction phase has been underestimated.	The Landscape Assessment set out in **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** are considered appropriate. Land use change is robustly assessed in the assessment of effects on Landscape Character. A technical note	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Indicative assessments ignore key elements like land use change, access, and infrastructure, leading to likely underestimation of both construction and early operational effects on landscape fabric alongside tranquillity and perceptual aspects of character and place. The Council disagrees that key landscape fabric components or character have been robustly assessed. The Council has previously commented on **9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]** within its Relevant Representation **[RR-4934]** and within its Comments on Submissions Received at Deadline 1 and 1A, Section 25, Para's. 25.1 to 25.4 **[REP2-048]**. The Council maintains its position.	clarifying how landscape fabric and landscape character is considered within the assessment was provided at Deadline 1 in **9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]**.	
3.4.14	Landscape Assessment results	The Council does not accept the results set out within Section 10 of the ES, Volume 1, Chapter 8: Landscape and Visual [APP-060], including likely	The Landscape assessment results set out within Section 10 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**, including likely	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		significant effects anticipated, as accurate and appropriate. The ES underestimates the long-term effects on landscape fabric, overstating mitigation benefits by Operation Year 15. Decommissioning is likely to cause adverse effects similar to construction, with only a Neutral or Minor Beneficial effect achievable if all infrastructure is removed. The Council has considered the applicant's additional assessment of landscape character effects on the local Landscape Character Areas and Types **[REP5-103]**. The Council does not agree with the applicant that the scheme avoids harm to the setting of the CNL or protects views to and from the CNL. The Council maintains its position that the assessment of landscape fabric components does not appropriately recognise the full physical loss and resulting physical changes to existing fabric components. And neither does it	significant effects anticipated, are accurate and appropriate. The Applicant acknowledges that as a consequence of the Development that there would be an immediate significant adverse change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, that this change would be limited to the lifetime of the Scheme, and therefore temporary. 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. 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. The Applicant has prepared an assessment of landscape	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		appropriately consider the physical and perceptual effects for the introduced new component elements of the scheme. The Council remains concerned that the correct levels of landscape and visual harm have not been robustly assessed or effects accurately established or clearly conveyed within the LVIA, to help inform decision taking. The Council stands by the landscape and visual effects and impacts identified within its Local Impact Report **[REP1-137].**	Character effects on the local Landscape Character Areas and Types **[REP5-103]** which provides greater detail and clarity on this distinction. With the setting of the CNL, 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 the long term which would further the purposes of the designation.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			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. NPS EN-1 recognises at para 5.10.5 that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape…"*	
3.4.15	Visual Assessment Results	Wiltshire Council provided comments on the visual assessment presented in the ES within its Relevant Representation [RR-4934] at paras 8.38, 8.39, 8.43 and 8.47. There is outstanding concern that a number of apparent viewpoints where there are significant adverse impacts have not been referenced in 8.3.3 [APP-192]. If these public receptors have not been	The Visual Assessment set out in **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** is considered appropriate. The representative viewpoints support the assessment of visual effects and have been appropriately referenced in the assessment of the visual receptors where applicable in **ES Volume 3,**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		assessed in the proper manner, with a photographic record, this work should be undertaken and included in the ES document at this stage. The Council has previously reviewed **[REP1-123]** at Section 27, Para's. 27.1 to 27.2, within its Comments on Submissions received at Deadline 1 and 1A **[REP2-048]**. The Council has previously reviewed **[REP4-078]** at Section 18, Para's. 18.1 to 18.6 within its Comments on Submissions Received at Deadline 4 **[REP5-113]**. The Council has reviewed **[REP6-062]** and provides its comments on this additional sequential assessment within its **Deadline 7 comments on Submissions Received at Deadline 6.** Despite the applicant's submission of additional Technical Notes and assessments, the Council maintains its concerns in relation to the various	**Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [REP6-020]** and **ES Volume 3, Appendix 8-3-3: Summary of Visual Effects [REP6-022]**. Tables 8.20, 8.21 and 8.22 in Chapter 8 of the ES text in **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** in the LVIA provides a summary of the Significant Visual Effects in accordance with EIA procedure. In accordance with GLVIA3 (paragraph 6.19) 'representative viewpoints, have been selected to represent the experience of different types of visual receptor, where larger numbers of viewpoints cannot all be included individually and where the significant effects are unlikely to differ – for example, certain points may be chosen to represent the views of users of particular public footpaths and bridleways'. It is considered that the submitted photography is representative of the visibility of the Scheme and the	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		shortcomings of the cumulative assessments.	photography provided from the agreed viewpoints is suitable to assist the reviewer's and decision maker's understanding of the both the landscape and visual context and effects of the Scheme. The Applicant has undertaken additional sequential visual assessments: • **Technical Note on Cumulative Sequential Visual Effects [REP1-123]** • **Sequential Visual Effect on Wiltshire Cycleway [REP4-078]** • **Additional Sequential Visual Assessments [REP6-062]** None of the additional Sequential Visual Assessments identified any additional significant effects above those identified within the LVIA as a consequence of the Lime Down Scheme itself. Sequential Visual Effects arise as a consequence of the Lime Down Scheme itself.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.4.16	Cumulative Visual Effects – In combination	The Council remains concerned that cumulative visual effects have not been adequately considered within the assessment. An assessment of cumulative visual effects of Sites A-E should be undertaken in two parts. Firstly, a combined or in combination assessment is required, which will be undertaken to cover a) where more than one site is visible in a viewing arc; b) where the receptor turns and is able to see another, or several other sites, in 360 degrees but without moving from the viewpoint location. The Council has previously reviewed **[REP1-123]** at Section 27, Para's. 27.1 to 27.2, within its Comments on Submissions received at Deadline 1 and 1A **[REP2-048]**. The Council has previously reviewed **[REP4-078]** at Section 18, Para's. 18.1 to 18.6 within its Comments on	Cumulative visual effects of Sites A-E have been assessed. For each visual receptor assessed the visibility of the Scheme was identified to the Site in closest proximity and secondly to the visibility of any other Lime Down Site. These effects are referred to as 'Cumulative Site Effects' and are set out in **ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [REP6-020].** There are very few receptors where cumulative site effects were identified. Receptor TP097 Bridleway WT|SHER|16 is an example where cumulative site effects were identified. The initial assessment noted: "The Bridleway passes through the centre of Site A and there is direct visibility to A2, A3, A7, A8, A9 and A10. There are also longer distance views towards Lime Down Site C from the southern end of the Bridleway near Lordswood Farm beyond intervening vegetation". The effects of Site A are assessed first which identified Major/ Moderate Adverse effects. In considering the	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Submissions Received at Deadline 4 **[REP5-113]**. The Council has reviewed **[REP6-062]** and provides its comments on the additional sequential assessment within its **Deadline 7 comments on Submissions Received at Deadline 6.** Despite the applicant's submission of additional Technical Notes and assessments, the Council maintains its concerns in relation to the cumulative assessments.	effects of the additional visibility of Site C which is visible in longer distance views beyond intervening vegetation from the eastern end of the Bridleway, the assessment concluded *"This would not increase the effects above those described above"* for Site A (see **ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [REP6-020]**). The Applicant has undertaken additional sequential visual assessments: • **Technical Note on Cumulative Sequential Visual Effects [REP1-123]** • **Sequential Visual Effect on Wiltshire Cycleway [REP4-078]** • **Additional Sequential Visual Assessments [REP6-062]** None of the additional Sequential Visual Assessments identified any additional significant effects above those identified within the LVIA as a consequence of the Lime Down Scheme itself. Sequential Visual	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Effects arise as a consequence of the Lime Down Scheme itself.	
3.4.17	Cumulative Effects – Inter-Project	Wiltshire Council requested that cumulative effects with other nearby solar/BESS projects up to 10 km, including the CRC, be assessed beyond ZTVs using desk studies, site visits, and photography. The 10km landscape and visual cumulative ZoI or study area, was determined by the Applicant as suitable for their cumulative landscape and visual assessment. The Council believes that cumulative ZoI limits should therefore be adhered to. The Council remains concerned that cumulative landscape and visual effects have not been adequately considered within the assessment, highlighting in particular the **Limestone Lowland** Landscape Character Type. The Council has consistently raised concerns about the applicant's approach to cumulative landscape assessment, questioned justification of the landscape ZoI limits, and raised	Inter-project cumulative effects occur when the impacts of one development interact with the impacts of other developments. It involves the interaction of impacts from different projects (nearby solar/BESS projects), potentially leading to a combined effect that is more significant than the sum of individual impacts. There are nine existing solar schemes which are considered within the LVIA for the Scheme. These nine existing solar schemes are considered within the baseline cumulative assessment. Thirteen cumulative development Sites have been included in the cumulative effects assessments as set out in Section 13 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004].** Inter project landscape and visual effects are assessed in the third Table of the Visual Assessment Sheets against the 13 included Developments Sites listed in Table 8-31 in Section 13	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		specific concerns of past, present and future solar and BESS developments cumulatively and incrementally changing the landscape at a Landscape Character Type and Landscape Character Area level, raised at Scoping, PEIR, and Relevant Representation consultation stages. The applicant has undertaken and submitted into the examination a series of technical notes (9.5; 9.6; 9.7). For clarity, these were not submitted at the request of Wiltshire Council, they have been submitted in response to the Council's and other IP's observations and comments made pertaining to ES, Vol 1, Chapter 8 [APP-060]. The Council has previously reviewed **[REP1-121]** within its Relevant Representation **[RR-4934],** and at Section 25, Para's. 25.1 to 25.4, within its Comments on Submissions received at Deadline 1 and 1A **[REP2-048]**. The Council has previously reviewed **[REP1-122]** at Section 26, Para's. 26.1 to 26.3, within its Comments on	of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004].** No visual relationship was recorded between any of the identified Cumulative Development Sites and the assessed visual receptors. As such there are no significant cumulative visual effects. This is due to the generally small-scale and intimate landscape, where much of the proposed development is relatively well-contained visually from the wider landscape. The Applicant has undertaken and submitted the following at Deadline 1 at the request of Wiltshire Council: • **9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]**; • **9.6 Technical Note on Intra Project Cumulative Visual Effects [REP1-122]**; and • **9.7 Technical Note on Cumulative Sequential Visual Effects [REP1-123]**.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Submissions received at Deadline 1 and 1A **[REP2-048]**. The Council has previously reviewed **[REP1-123]** at Section 27, Para's. 27.1 to 27.2, within its Comments on Submissions received at Deadline 1 and 1A **[REP2-048]**. Despite the applicant's additional submission of Technical Notes, the Council maintains its views in relation to the inadequacy of cumulative assessments.		
3.4.18	Cumulative Visual Effects – Sequential Point 1	Secondly, a sequential assessment of visual effects should be required along well-used routes, including the Fosse Way, PRoW and minor roads, which the Council believe is not adequately assessed currently in the ES, because the ES does not describe the changing effects along the routes including rural roads linking village settlements, instead focusing on major roads despite GLVIA3 guidance applying to all regularly used routes. The Council does not agree with the Applicant that the land within the	As shown by the example of Receptor TP097 above, sequential visual effects of the Scheme on individual receptors have been addressed in the visual assessment. In accordance with Table 7.1 of GLVIA3 which states "*sequential effects may be assessed for travel along regularly used routes such as major roads or popular paths*" the LVIA in Table 8-23 of **ES Volume 1, Chapter 8 Landscape and Visual [REP6B-004]** identifies the following	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		scheme simply comprises discrete areas. The disaggregated nature of the scheme areas increases the likelihood and potential for sequential visual effects to be experienced over a large area. Whether the scheme can be viewed or perceived in its entirety is not determinative to the consideration of cumulative sequential visual effects. The whole point of the sequential assessment is to establish to what degree the appreciation of an overall increase in solar and energy infrastructure will be apparent to the users of these routes as they move through this rural landscape, i.e. whether the consideration of numerous non-significant effects encountered and experienced by visual receptors as they weave through the DCO area Limits, cumulatively give rise to a significant effect. The council maintains that not all areas contained within the order limits could be described as discrete areas, some	publicised routes where there are sequential visual effects: • The Macmillan Way; • The White Walls Way (Stage 3); • Sherston Walk 2; and • The Fosse Way. As the routes are made up of lots of individual sections of various footpaths, bridleways, roads etc., Table 8-33 also identifies the PRoW and Public Highway Receptors which have been fully assessed in the Visual Assessment. Sequential Effects for users of these Recreational Routes are not considered to be any greater than those effects identified for the individual sections as set out within **ES Volume 3, Appendix 8-3 series [REP6-018 to REP6-023]**. Whilst it is recognised that there would be an appreciation of an overall increase in solar infrastructure as users of these routes move through the landscape, due to the discrete areas of land within the Scheme and the rolling	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		are quite open and expansive with some far-reaching views. Regardless of whether the scheme can be perceived in its entirety, the perceptual experience for recreational users which pass through and adjacent panel fields, or in proximity to sub-stations and the BESS will completely change. Users' perceptions will change from that of a large area of deeply rural, highly tranquil agricultural countryside which is notably absent of modern urban influences and industrial commercial uses with some characteristic open views, to that of an area of industrialising renewable energy generation, storage and transfer infrastructure at a very large commercial scale, framed by unusually high maintained hedgerows that close down and remove existing open views and more distant appreciation of landscape and scenic beauty. The Council has previously reviewed **[REP1-121]** within its Relevant Representation **[RR-4934],** and at Section 25, Para's. 25.1 to 25.4, within	topography of the landscape, the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features helping to assimilate them into the landscape. The Applicant has undertaken and submitted the following at Deadline 1 at the request of Wiltshire Council: • **9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]**; • **9.6 Technical Note on Intra Project Cumulative Visual Effects [REP1-122]**; and • **9.7 Technical Note on Cumulative Sequential Visual Effects [REP1-123]**. The Applicant has undertaken additional sequential visual assessments: • **Sequential Visual Effect on Wiltshire Cycleway [REP4-078]**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		its Comments on Submissions received at Deadline 1 and 1A **[REP2-048]**. The Council has previously reviewed **[REP1-122]** at Section 26, Para's. 26.1 to 26.3, within its Comments on Submissions received at Deadline 1 and 1A **[REP2-048]**. The Council has previously reviewed **[REP1-123]** at Section 27, Para's. 27.1 to 27.2, within its Comments on Submissions received at Deadline 1 and 1A **[REP2-048]**. The Council has previously reviewed **[REP4-078]** at Section 18, Para's. 18.1 to 18.6 within its Comments on Submissions Received at Deadline 4 **[REP5-113]**.The Council has reviewed **[REP6-062]** and provided its latest comments on the additional sequential assessment within its **Deadline 7 comments on Submissions Received at Deadline 6.** Despite the applicant's further submissions of additional assessments and Technical Notes, the Council maintains its position in regard to the assessment of landscape fabric and	• **Additional Sequential Visual Assessments [REP6-062]** None of the additional Sequential Visual Assessments identified any additional significant effects above those identified within the LVIA as a consequence of the Lime Down Scheme itself. Sequential Visual Effects arise as a consequence of the Lime Down Scheme itself.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		character, and for cumulative landscape and visual assessment.		
3.4.19	Cumulative Visual Effects – Sequential Point 2	Sequential visual effects need to be treated as described above. It is of concern to the LPA that the effects on users of the Fosse Way have not been fully addressed. The sequential assessment should include the Newton Dairy, Long Newton Airfield and Upper Marsh Farm installations, north of Malmesbury before proceeding to Lime Down Sites B and C. Further potential sequential effects should be assessed along the A429 / A350 route from west of Charlton Park (north of Malmesbury); passing Rodbourne Rail solar farm; south to Lime Down Sites D & E; then land at Red Barn NE of Kington St Michael. It does not appear that these sequential assessments have been undertaken as part of the ES. The Council considers it inappropriate to assume that combined impacts cannot exceed those of individual sites, and concludes that intra-project cumulative landscape and visual	The Applicant has undertaken additional sequential visual assessments, which includes the routes requested by Wiltshire Council: • **Technical Note on Cumulative Sequential Visual Effects [REP1-123]** • **Sequential Visual Effect on Wiltshire Cycleway [REP4-078]** • **Additional Sequential Visual Assessments [REP6-062]** None of the additional Sequential Visual Assessments identified any additional significant effects above those identified within the LVIA as a consequence of the Lime Down Scheme itself. Sequential Visual Effects arise as a consequence of the Lime Down Scheme itself.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		effects must be assessed separately from site-specific impacts, particularly given the dispersed nature of Sites A–E. The Council has previously reviewed **[REP1-123]** at Section 27, Para's. 27.1 to 27.2, within its Comments on Submissions received at Deadline 1 and 1A **[REP2-048]**. The Council has previously reviewed **[REP4-078]** at Section 18, Para's. 18.1 to 18.6 within its Comments on Submissions Received at Deadline 4 **[REP5-113]**. The Council has reviewed **[REP6-062]** and provides its latest comments on the additional sequential assessment within its **Deadline 7 comments on Submissions Received at Deadline 6.** Despite the applicant's further submissions of additional assessments and Technical Notes, the Council maintains its position in regard to the		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		submitted cumulative landscape and visual assessments.		
3.4.20	Cumulative Visual Effects - Intra Project	Combined intra-project viewpoints can be simply ascertained by utilising a detailed ZTV methodology, suitable for the project scale, as detailed above in ZTV and ZoI. In relation to the Council's position, the Applicant references factors, which are not relevant to the Council's concerns. See comments for 3.4.19.	As set out in Section 13 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** there are two main types of cumulative effects in EIA. These relate to how multiple projects or multiple impacts from a single project combine to affect the environment. Intra or in combination effects are impacts from different aspects of the same project. For example, this can happen during construction if a receptor is subjected to noise, dust, and visual impacts associated with site works. In the ES, this type of effect is considered in **Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073].** The Applicant has undertaken and submitted **9.7 Technical Note on Cumulative Sequential Visual Effects [REP1-123]** at Deadline 1 at the request of Wiltshire Council.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.4.21	Inter project cumulative landscape and visual Effects	The Council considers it inappropriate to assume that combined impacts cannot exceed those of individually assessed sites, and concludes that intra-project cumulative landscape and visual effects must be assessed separately from site-specific impacts, particularly given the dispersed nature of Sites A–E. The Council does not agree that the LVIA robustly assesses cumulative landscape and visual effects, in particular cumulative landscape effects over the project's large footprint area, which is a key part of the Council's concern with the Applicant's LVIA assessment for character and fabric, and sequential visual. See comments for 3.4.19.	The LVIA robustly assesses the landscape and visual effects of the individual Sites and the Cumulative Site effects or otherwise referred to as the Scheme effects. However, due to the dispersed nature of the Sites and the generally small-scale and intimate landscape, much of the proposed development is relatively well-contained visually from the wider landscape. The Applicant has undertaken and submitted the following at Deadline 1 at the request of Wiltshire Council which further support the findings contained within the **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**: • **9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]**; • **9.6 Technical Note on Intra Project Cumulative Visual Effects [REP1-122]**; and • **9.7 Technical Note on Cumulative Sequential Visual Effects [REP1-123]**.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.4.22	Protected / valued landscape status	The Council considers Lime Down Areas A, B and C fall within the setting of the Cotswolds National Landscape (CNL). The Council considers Lime Down Areas D and E to fall outside of the setting of the CNL. As such, Lime Down Areas A, B and C are considered to comprise higher value landscape which is highly sensitive to the changes that will arise from the location, scale and nature of the development being proposed.	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. In **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** the CNL, as a designated landscape is assessed as High Value and High Sensitivity. Lime Down Sites A, B and C within the 1 km and 2km Study Areas which are within the setting of the CNL are assessed as High to Medium Value and High to Medium Sensitivity. Sites D and E within the 1 km and 2 km Study Areas are assessed as Medium Value and Medium Sensitivity.	**Agreed**

3.5 Ecology and Biodiversity

Table 3-5: Ecology and Biodiversity

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.5.1	Legislation and Policy	Wiltshire Council notes that the ES identifies relevant ecological legislation and planning policy, including national policy and emerging Wiltshire Local Plan policies.	The Applicant considers that **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** has identified and appropriately considered all applicable legislation and policy.	**Agreed**
3.5.1a	Legislation and Policy	The Council has raised concern that given the extent of the Order Limits and the scale and nature of the proposed Scheme, there will inevitably be adverse effects on priority habitats / habitats of principal importance (HPI) listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, such as on account of hedgerow removal, and on protected species, species of principal importance (SPI) and Birds of Conservation Concern (BoCC). The Council therefore considers it unlikely to be possible for the proposed Scheme to wholly comply with all requirements of national and local planning policy.	The Applicant acknowledges that some adverse ecological effects are unavoidable. These are transparently reported within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** and are summarised within the residual effects summary tables (Table 9-14 and 9-15)	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council does not wholly agree with the Applicant's Position statement on this matter and considers that the potential for adverse effects on ecological features and receptors as a result of proposals in the Cable Route Corridor during construction in particular, have been under-estimated. This issue was also raised in the Council's statutory consultation response (March 2025).		
3.5.2	Rochdale Envelope Approach	Worst-case parameters have not been fully assessed in **ES Chapter 9 [APP-061]**, the **HRA Report [APP-275],** the **Statutory Biodiversity Metric [PDA-008]** or the **BNG Assessment Report [APP-273]**, and the ES does not explain how worst case has been secured across the related assessments. Schedule 12 of the Draft DCO [APP-016] effectively sets out the worst case, but the Council considers it has not informed those assessments and that the approach taken to Schedule 12 misapplies Advice Note Nine: Rochdale Envelope (v3, July 2018). The criteria	The extent and purpose of the design flexibility sought is defined in **ES Chapter 3 The Scheme [APP-055]** and follow Advice Note Nine. **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** applies precautionary worst-case assumptions, including the reasonably anticipated maximum land take, infrastructure footprint and construction timescales, and assesses realistic worst-case effects on all ecological receptors. The approach taken in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021] and the HRA Report**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		in that guidance have not been fully met and no sound rationale has been demonstrated. The Council considers it would be inappropriate for the Draft DCO to be approved in its current form, notwithstanding that a similar approach has been used on other NSIPs.	**[REP3-090]** has been agreed with Natural England for matters within their remit.	
3.5.3	Methodology for cumulative and in-combination effects	Wiltshire Council has consistently raised concern (including in emails) regarding the Zones of Influence (ZoI) used for the assessment of cumulative and in-combination effects, and considers a larger ZoI should have been applied, particularly due to likely presence of highly mobile species and the scale of the development proposals.	The Applicant considers the study areas and ZoI adopted are proportionate to the nature of the Scheme and reflect recognised practice for NSIP solar development. Mobile species and potential impact pathways have been given appropriate consideration.	**Not Agreed**
3.5.4	Baseline methodology	Wiltshire Council consider that the desk study for the Cable Route Corridor (CRC) is inadequate, as it limits data collection to within the corridor itself and does not consider statutory or non-statutory designated sites beyond it. The desk methodology used in relation to the CRC is therefore a concern to the Council as it has not facilitated the	The Applicant considers the desk study was scoped proportionately, having regard to the temporary nature of the works, the absence of permanent operational effects, and refinement of the construction working width to approximately 25 m (narrower at hedgerow breaches). Searches for	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		identification of any international, national or local designated sites, HPI / priority habitats or ancient woodland beyond the CRC even though it extends the substantial distance of approximately 22km and will be up to approximately 665m in some locations and temporary construction compounds will be sited throughout the CRC. The underlying assumption that there are no, or only limited, pathways for effects beyond the construction footprint is incorrect. Given reliance on the Rochdale Envelope approach, a comprehensive baseline is required so that realistic worst-case effects on all receptors can be assessed. See also 3.5.8.	designated sites and priority habitats were therefore focused within the CRC. A wider search for non-statutory designated sites was undertaken at PEIR stage across the Cable Route Search Corridor, which covered a larger area than the CRC, and that information helped define the narrower corridor. Fixed 2 km and 1 km search radii are not automatically required in all circumstances; search areas should be informed by the zone of influence and the existence of credible impact pathways. Works within the CRC are temporary, contained and relatively low impact, and a low risk of pathways to designated sites, ancient woodland or priority habitats beyond the corridor was identified. The 500 m protected species search radius was defined on the same basis and was considered sufficient to identify populations for which construction-phase disturbance, temporary habitat loss or fragmentation could realistically occur. It differs from	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			the wider search used at the Solar PV Sites, where long-term land-use change applies. Embedded mitigation and controls secured through the **Outline CEMP [REP7-073]** and **Outline EPMS [REP7-083]** provide further assurance that significant effects beyond the CRC will be avoided.	
3.5.5	Baseline – Habitats within the CRC	Wiltshire Council does not agree with the content of the Applicant's Position Statement on this matter because habitat survey information and data for the entirety of the CRC was not included in the assessment presented in ES Chapter 9: Ecology and Biodiversity [APP-061] submitted with the DCO application and instead conclusions had been drawn from aerial imagery for 17 hectares within the CRC for which baseline information collated through habitat survey was omitted from the ES, the HRA and the Statutory Biodiversity Metric. Therefore, Wiltshire Council raised	Habitat surveys have been undertaken across the entirety of the CRC, including at additional areas completed following the Council's statutory consultation response, and this data has informed the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]**.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		concerns regarding the evident gaps in baseline data. Wiltshire Council recognises that habitat survey at the additional areas (where access was permitted) was completed subsequent to provision of the Council's statutory consultation response. As such, this matter is now agreed despite the baseline information being initially omitted at the point the DCO application was submitted.		
3.5.5a	Baseline – Habitats within the CRC	The Council has also consistently raised concern regarding the lack of any species/species group specific surveys within the CRC; notably bat survey within the section of the CRC that coincides with a greater horseshoe bat consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). This is because collation of baseline data by means of dedicated Phase 2 survey would have informed the ES and the HRA thereby increasing the robustness, accuracy	The Applicant considers the baseline conditions which are detailed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** and **ES Volume 3, Appendices 9-1: Ecological Baseline Report [REP4-019] to 9-6: Water Vole Survey Report [APP-203]** are representative of the baseline site conditions within the CRC.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		and reliability of the assessments presented therein.		
3.5.6	Habitat Survey Methodology	Wiltshire Council has raised issue with the habitat survey methodology presented in Section 2.3 of ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] as it does not specify whether areas added following the June 2025 boundary amendments have been surveyed. It appears that the areas have been subsumed within the red line boundary of the Scheme and so clarity regarding whether these areas have been surveyed is required, especially in relation to Change Locations 7 and 10. The Council has raised the issue of the un-surveyed area within the CRC and highlighted that this is a concern for the Council as host authority. Although, it is stipulated in APP-198 that the precautionary principle has been applied, the absence of the associated ecological baseline data represents a significant omission and could give rise to inaccuracies in the ES and HRA.	The Applicant confirms that all of the fifteen areas subject to Targeted Consultation in June 2025 have been surveyed. In relation to Change Locations 7 and 10 in particular, see the Applicant's response at 3.5.42. The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising the **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021].** Since the preparation of **ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP4-019],** habitat surveys have now been completed across all previously un-surveyed areas. The survey methodology applied was consistent with that reported in the **ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP4-019]** for the rest of the Cable Route Corridor The results of these surveys have been reviewed and, in the Applicant’s view,	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council recognises that the Applicant's submitted habitat survey information for the areas within the CRC for which baseline information based on field survey had been omitted within the DCO application at Deadline 1. The council subsequently reviewed that updated information and as such, this issue has effectively been addressed during the Examination period. See also 3.5.5, 3.5.21 and 3.5.42.	do not alter the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** regarding likely significant effects. The precautionary assumptions previously applied in the ES were conservative and appropriately accounted for any uncertainty associated with un-surveyed areas. The Applicant has updated **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** and provided a revised version at Deadline 1 with the findings of these surveys, and it is considered these do not materially change the assessment of likely significant effects presented in the chapter.	
3.5.7	Breeding Bird Survey Methodology	Wiltshire Council has raised concern that most survey zones did not receive the requisite number of visits during a single season and that instead the survey was split across 2023 and 2024, with potential implications for the robustness of the territory identification and analysis. Whilst it is noted that paragraphs 1.2.7 and 1.2.26 of	The rationale for spreading visits over two years is given at paragraph 1.2.26 of **ES Volume 3, Appendix 9-4: Breeding Bird Survey Report [APP-201].** The Applicant maintains it captures annual variation in habitat suitability arising from crop rotation on predominantly arable land and	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Appendix 9-4 [APP-200] put forward a rationale for the split, it is not considered to be a robust rationale and did not include a reason why a full suite of visits was not completed in 2024 to give a complete dataset for that year. Furthermore, no rationale is given for the 2024 surveys starting relatively late in the breeding season, on 10–12 April. Although paragraph 1.2.11 states that the field methodology followed BTO Common Birds Census guidance and the Bird Survey Guidelines, it should be noted that the BTO methodology recommends that surveys should generally commence in mid-March and that therefore the survey methodology employed deviated from best practice.	identifies patterns of persistent use by key species. The Bird Survey Guidelines recommend six visits during the breeding season as proportionate effort but do not require all six to fall in the same calendar year. The Applicant acknowledges that the April start is not in strict accordance with the Bird Survey Guidelines. March activity is typically limited to early breeders such as thrushes, tits, pigeons and corvids. The species of interest are farmland ground-nesting birds – particularly skylark, and also yellow wagtail, quail and corn bunting – which typically nest from April onwards and were considered at greatest risk given that most impacts fall on in-field habitats. Species such as lapwing that may begin in March continue nesting into April and would still be captured. The absence of March data is not considered a significant limitation on the robustness of the data or the conclusions.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.5.8	Baseline - Non-Statutory Designated Sites	Non-statutory nature conservation sites within 2 km of the solar PV sites are identified in the ES, but for the CRC, the desk study only considered the CRC itself with no search beyond the Order Limits. Wiltshire Council deems this inadequate because construction activities (e.g., light spill, dust, noise) could affect nearby non-statutory sites and the species. they support. A robust ecological baseline, informed by realistic worst-case pathways and application of the precautionary principle, is needed to facilitate comprehensive and robust assessment of the impacts, especially given the reliance on the Rochdale Envelope approach. It is considered therefore that this requirement has not been fully met. See also 3.5.4	As set out at 3.5.4, the CRC desk study was scoped proportionately to the temporary nature of the works and the approximately 25 m working width. A wider search area for non-statutory designated sites is not considered essential given the short-term works and the lack of plausible impact pathways. Temporary compounds and associated lighting, dust deposition and noise are subject to embedded mitigation and controls secured through the **Outline CEMP [REP7-073]** and **Outline EPMS [REP7-083],** limiting effects beyond the immediate working area. The Rochdale Envelope has therefore been applied appropriately, with the CRC assessed on the basis of the maximum reasonable construction impact.	**Not Agreed**
3.5.9	Baseline – presentation of habitats	Paragraphs 3.2.3 to 3.2.7 of **Appendix 9-1 [APP-198]** did not make clear that the priority habitat information presented was desk study output rather than field survey data, giving the	The Applicant notes this comment and acknowledges those priority habitats listed in those paragraphs relate to only priority habitats identified during the desk study. The text in **ES Volume 1,**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		incorrect impression that other HPI are absent from the Solar PV Sites and the CRC. A 'Desk Study Results' heading was suggested. As of 6th July 2026 (comprising the second occasion the Council has input into the SoCG), the Council can verify that the iteration of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** has been updated accordingly.	**Chapter 9: Ecology and Biodiversity [REP7-021]** has been updated to make this clear at Deadline 1. It is considered that this does not change the conclusions presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]**. All HPI / Priority Habitats present within the CRC are reported within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]**.	
3.5.10	Baseline - Other Neutral Grassland – Solar PV Sites and CRC	Wiltshire Council notes that other neutral grassland is identified in Fields E12, E18, E26 and C29, none of which are assessed as qualifying priority habitat, and across approximately 15.44 ha (3.34%) of the CRC, where it is described as botanically diverse and a good example of the habitat type. No species composition detail, and no assessment of whether any of it qualifies as HPI was provided for the CRC. Areas mapped on Baseline Habitat Maps (Figures 9.1.13–9.1.24) as both 'Habitat Assumed' and 'Other neutral	The Applicant notes the Council's comment. The Applicant confirms that no area of other neutral grassland within the CRC constitutes HPI / priority habitat; any such habitat would have been recorded and mapped as such. **Appendix 9-1 [REP4-019]** was updated at Deadline 1 to confirm this. Areas mapped as both 'other neutral grassland' and 'Habitat Assumed' on **Figures 9-1-13 to 9-1-24 [REP1-036]** had not been surveyed when those figures were prepared. They were assigned habitat types from satellite	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		grassland' had not been surveyed. The Council advised that these areas should be surveyed before determination and that pending survey, the areas should be assumed to comprise grassland HPI given that the precautionary principle should be applied. The Council maintains that this information should have been provided in the Appendix 9-1 submitted with the application As of 6 July 2026, the Council was able to verify that the **BNG Assessment Report (Rev 3) [REP3-085]** submitted at Deadline 3 included quadrat data from the previously un-surveyed grassland; that Table A5 had been revised and that Table A27 had been added.	imagery, desk study analysis and surveyed habitats in the surrounding area, as described at paragraph 9.7.18 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021**], using 'other neutral grassland' as the highest-value habitat likely to be present on a precautionary basis. All such areas have now been surveyed using the methodology reported for the rest of the corridor. None was considered to represent HPI; most were reassigned to arable land or modified grassland, both of lower intrinsic biodiversity value. ES Chapter 9 and the relevant appendices have been updated and the findings do not materially change the assessment of likely significant effects. Botanical quadrat data from previously un-surveyed grassland is provided in the **BNG Assessment Report [REP3-085] (Revision 3)** at Deadline 3.	
3.5.11	Baseline – Ponds	The evaluation of the ponds within the solar PV sites and CRC presented in paragraph 3.2.77 of ES Vol 3, 6.3	All ponds within the Order Limits have been assumed to represent HPI / priority habitat on a precautionary basis	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Appendix 9-1: Ecological Baseline Report [APP-198] appraises this habitat as being of Local Importance. The evaluation does not specify that the ponds within the Order Limits likely qualify as HPI / priority habitat, despite the fact that in the legends of the Baseline Habitats Maps (Figures 9.1.8 – 9.1.12 and Figures 9.1.13 – 9.1.24) in ES, Vol 2, ponds are described as "Ponds (priority habitat)". Wiltshire Council recognised the Applicant's Position on this matter, however, the point was 'Under Discussion' until the updated ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] was published at Deadline 1. As of 6th July 2026 (comprising the second occasion the Council has input into the SoCG) Wiltshire Council confirms that the evaluation of ponds within **ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083]** submitted at Deadline 1 has been revised and the necessary	given the likely presence of toads and other amphibians. The rationale for this is set out in Table 9-7 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** although it is acknowledged that it would be helpful to also set this out within **ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083] (Revision 2)** and this was updated accordingly and at Deadline 1.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		amendments have been made to clarify the discrepancy.		
3.5.12	Baseline - Hedgerows	Wiltshire Council has noted that the ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] stipulates that over 84km of hedgerow exists across the Solar PV Sites, over 66km of which were categorised as species-rich and a large proportion contained occasional semi-mature to mature trees and that the majority of hedgerows within the CRC are species-rich and form a network of connective linear features within the landscape. As such, the ecological importance of the hedgerow network and the fact that in general hedgerows comprise a HPI / priority habitat, is recognised in the evaluation. However, the evaluation in Volume 3, Appendix 9-1 and ES Chapter 99 omits discussion regarding the extent of hedgerow that meets the criteria of “important hedgerows” under the Hedgerow Regulations 1997. This point was also previously raised in the	The Applicant considers that 'Importance' under the Hedgerow Regulations 1997 rests on landscape and heritage criteria as well as ecological value, and so was not discussed in the ecological assessment presented in **ES Chapter 9 [REP7-021]**. All important hedgerows are mapped on the TPO and Hedgerow Plan **[REP7-006].** Chapter 9 **[REP7-021]** evaluated hedgerows on their intrinsic biodiversity value – for example as wildlife corridors and shelter and foraging resource – consistent with all other habitat types and with the methodology at paragraphs 9.6.19 to 9.6.22.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Council's statutory consultation response. Furthermore, this information is evidently available to the Applicant as Schedule 12 of the Draft DCO lists important hedgerows within the Order Limits and their associated lengths; and the legends to the Baseline Habitats Maps (Figures 9.1.8 – 9.1.12 and Figures 9.1.13 – 9.1.24) list various categories of native species-rich hedgerows. As such, the Council considers there should be consistency across the documents and plans submitted as part of the DCO Application and that the important hedgerows should have been identified and assessed in the ES, Chapter 9. The Council acknowledges the Applicant's Position Statement on this matter and is aware that important hedgerows are shown on the **TPO and Hedgerow Plan [APP-011**] but maintains its stance.		
3.5.13	Baseline – Badger	Wiltshire Council notes that the Applicant's ecological consultant has recorded 25 badger setts of varying	**ES Volume 2, Appendix 9-2: Badger Survey Report [APP-199]** and **ES Volume 2, Appendix 9-8: Schedule**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		status and levels of activity within Lime Down Sites A-E, along with a number of field signs., and that a total of eight badger setts have been identified within the Cable Route Corridor, including two main setts. Nevertheless, given that species-specific survey has not been conducted within the Cable Route Corridor it is possible that other setts may be present that were not detected during the habitat surveys. There will also be a need for update surveys to be conducted prior to commencement of construction (assuming the ExA grants approval) in case any new setts are constructed in the intervening period.	**of Protective Ecological Buffers [APP-205]** as well as corresponding **ES Volume 2, Figure 9-2-1 to 9-2-5: Badger Setts - Solar PV Sites [APP-115]** and **ES Volume 2, Figure 9-2-6 to 9-2-10: Badger Setts - Cable Route Corridor [APP-116]** provide information of the locations of badger setts and activity. These are confidential at the instruction of PINS due to containing sensitive information relating to species at risk of persecution. It is the Applicant's view that the assessment of effects on badgers provided within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** is acceptable. Furthermore, it is the Applicant's view that the badger surveys undertaken at the Solar PV Sites and Cable Route Corridor (as outlined on **Appendix 9-2: Badger Survey Report [APP-199]**) are appropriate for determining the presence of setts and field signs, and followed standard good practice for badger walkover surveys. The	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Applicant therefore considers this matter to be agreed.	
3.5.14	Baseline – Roosting Bats	Wiltshire Council considers it would have been prudent for the Bechstein's bat core maternity roosts to the south of Chippenham to have been included in paragraph 3.3.15 of ES Volume 3, Appendix 9-1: Ecological Baseline Report (APP-198) as these roosts are located within 2km of the Cable Route Corridor. Moreover, the Council provided a Technical Note regarding these roosts on 2 October 2024, well in advance of the DCO application being submitted. The Council's view is that although buildings are likely to be retained within the Scheme layout, there could be indirect disturbance to any bats using the buildings as roost sites during the construction phase and that as such, further survey of buildings with identified potential roost features (PRFs) would have served to inform the layout of the Scheme in terms of ascertaining where infrastructure,	The precise location of the Bechstein's bat core maternity roosts south of Chippenham have not been disclosed to the Applicant, although the approximate location was provided and this has been noted in paragraph 9.7.15 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021**] and in paragraph 1.3.8 of **ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200]**. It is the Applicant's view that the ecological assessment undertaken within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** has fully considered the presence of these roosts and their location relative to the Order Limits. Following the Council's comments on the PEIR, the roosting bat assemblage was re-evaluated and increased to District Importance on a precautionary basis, reflecting the number of trees with roost potential and the seasonal roosting opportunities identified.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		BESS sites, compounds and so forth should be sited to minimise the potential for impacts on bats. It would have also strengthened the ES and HRA and would have been particularly useful within the section of the Cable Route Corridor that coincides with a greater horseshoe bat consultation zone around a component of the Bath and Bradford-on-Avon Bats SAC and would have provided data to inform the HRA, thereby increasing its robustness and reliability. This matter has been raised previously within Wiltshire Council's statutory consultation response. See also 3.5.24.	Paragraphs 9.10.170 to 9.10.180 of ES Chapter 9 set out that all buildings will be retained and protected throughout all phases, and no significant impacts are predicted on any bats roosting within them. It is the Applicant's view that further survey to determine presence or likely absence in buildings is therefore considered unnecessary.	
3.5.15	Baseline Foraging / Commuting Bats	**Solar PV Sites** The Council previously raised the issue of the loss of a significant area of permanent pasture and consequent effects on bats, particularly loss of greater horseshoe foraging resource. The reduction in projected pasture loss since the PEIR is acknowledged, but	The rationale for not undertaking manual transect surveys is set out in paragraphs 1.2.16 to 1.2.19 of **ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200],** and in the Applicant's view the survey effort is considered appropriate.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the Council remains concerned at total reliance on static detector survey. The manual transect surveys recommended in key bat habitat were not undertaken, notwithstanding Bat Conservation Trust guidelines. **Cable Route Corridor** No bat activity surveys were conducted. The Applicant assumed habitats are similar in value and species composition to the Solar PV Sites and that temporary habitat removal would be reinstated. The Council accepts that survey across the whole corridor would be unfeasible and possibly unnecessary, but expected targeted survey where impacts are likely to be greatest: near temporary construction compounds, where the corridor coincides with the greater horseshoe consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats SAC, and near the Bechstein's roosts south of Chippenham, particularly in cattle-grazed pasture. The council considers that some survey was needed to inform	The Applicant maintains that, due to the short-term and temporary and temporary nature of works within the CRC, the relatively localised construction footprint (i.e. 25m typical width of the cable works plus temporary construction compounds) and the absence of permanent operational effects, an adequate assessment of impacts on foraging / commuting bats has been made based on the appraisal of habitats undertaken. It is the Applicants view that potential impacts within the CRC, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary and reasonable worst-case basis, and that the mitigation measures to be secured as part of DCO requirements are appropriate for ensuring no significant residual adverse impacts will occur in line with the conclusions of **ES Volume 1, Chapter 9 Ecology and Biodiversity [REP7-021]**.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the assessment, the HRA and the design of appropriate and adequate mitigation, and highlights that there had been opportunity to undertake such survey in 2025. The rationale given is not considered sound or sufficiently precautionary. The precautionary approach to the Bechstein's roosts assumed to be linked to the SAC is endorsed.		
3.5.16	Baseline - Otter and Water Vole – Solar PV Sites and CRC	The Council's statutory consultation response to the PEIR raised concern that species-specific surveys for otters and water voles had not been conducted within the Solar PV Sites and Cable Route Corridor (CRC). The DCO application had likewise not been supported by species-specific survey for otter and water vole within the Solar PV Sites or CRC. This is deemed inadequate and it is considered that a suitably robust rationale for the lack of these surveys has not been provided. This is particularly pertinent given that the applicant has opted to rely on the Rochdale Envelope approach.	The Applicant considers that a precautionary and reasonable worst-case scenario has been assumed for the assessment of impacts within **ES Volume 1, Chapter 9 Ecology and Biodiversity [REP7-021]**, whereby both species have been assumed to be present in all suitable habitat, based on a comprehensive habitat appraisal. It is the Applicant's view that proposed embedded mitigation (such as adoption of trenchless technologies to avoiding impacting watercourses) or additional mitigation in the form of pre-construction surveys, micro-siting of works within the cable route corridor etc. to be secured by the **Outline**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			EPMS [REP7-083], are entirely adequate for ensuring no significant residual impacts would occur in line with the conclusions of the assessment provided in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021].**	
3.5.17	Baseline - Great Crested Newt – CRC	Confirmation that the Applicant intends to use Natural England's GCN District Level Licensing Scheme (DLL) in respect of the CRC is acknowledged. This necessary detail regarding the proposed mitigation strategy for the CRC had not been provided within the PEIR and as such, the Council's statutory consultation response had queried this point. Nevertheless, the required Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England should have been obtained by the Applicant and submitted with the DCO application. ES Chapter 9 specifies that there is intention to apply to use the DLL, however it does not stipulate that an application for a IACPC has been	The Applicant confirms that an IACPC countersigned by Natural England has been obtained and will be submitted as evidence of the Schemes acceptance into the District Level Licensing Scheme. The IACPC contains an 'Impacts Plan' corresponding with the Cable Route Corridor elements of the Order Limits. The assessment of effects on great crested newts is considered to be acceptable. An IACPC countersigned by Natural England has been obtained and will be submitted as evidence of acceptance into the DLL scheme. It contains an Impacts Plan corresponding to the CRC elements of the Order Limits. The	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		submitted to date. The omission of the necessary IACPC in support of the DCO application is considered an important issue for the reasons detailed in the Council's Relevant Representation (January 2026). A copy of the IACPC was emailed to Wiltshire Council on 6 May 2026. There are a couple of discrepancies noted in the IACPC. Firstly, Section 2.1 states there are no ponds within the proposed site boundary (which for the purposes of the IACPC is the CRC) and Section 2.2 states that the total number of ponds within 250m buffer around the proposed site boundary is 150, whereas paragraph 3.3.59 of ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] stipulates that approximately 130 waterbodies were identified within the CRC and surrounding 250m. Secondly, Section 3.1 of the IACPC indicates that the DLL enquiry has been submitted with survey information, (which means Habitat Suitability Index ((HSI)) information,	assessment of effects on great crested newt is considered acceptable. On pond numbers: for a predominantly temporary scheme, Natural England excludes from the DLL site boundary ponds that will not be directly impacted, and that boundary is not contiguous with the Order Limits. Conversely, all ponds within 250 m of the CRC are captured for DLL purposes regardless of their association with other Scheme elements, whereas paragraph 3.3.59 of **Appendix 9-1 [REP4-019]** excludes ponds associated with the Solar PV Sites, which are described separately. This accounts for the difference. The survey information provided to Natural England in support of the DLL enquiry comprised the presence/absence surveys of ponds at the Solar PV Sites reported in **Appendix 9-5: Great Crested Newt Survey [APP-202].**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		presence/absence survey data, population class (if GCN present). This has implications for how the remainder of the form has been completed and what has been agreed with Natural England (NE). However, the DCO application has not been accompanied by any such GCN survey information pertaining to the CRC and instead indicates there has been no species-specific survey in respect of the CRC. Given that Annex 3 to the IACPC provides figures which relate to the entire Order Limits rather than just the boundary of the CRC to which the application to use DLL applies, it is assumed that GCN survey information for the Solar PV Sites was submitted to the NE with the DLL application and that this accounts for why it is has been stated in the IACPC that survey information has been provided. Clarification on this matter should be sought.		
3.5.18	Baseline – Great Crested	The Council notes that presence of GCN has been confirmed at two ponds within Sites Lime Down C and E, as well as within a further 14 ponds	For the Solar PV Sites, the key embedded mitigation is protective buffer zones (paragraph 9.10.237 of	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
	Newt – Solar PV Sites	located within 250 m of the Solar PV Sites. However, as detailed in the Council's Written Representation, ES Chapter 9 does not discuss what decision was taken in respect of the proposed mitigation strategy for the Solar PV Sites and the potential need for acquisition of a GCN mitigation licence(s) to allow the works to legally proceed, how the decision was reached and what the justification for the determined approach comprises. It is the Council's view that if the decision has been taken to rely on the precautionary working methods detailed in Chapter 9 and the Outline EPMS [APP-284], then this should have been stated clearly in the ES Chapter 9 together with a robust rationale to demonstrate that it is appropriate, sufficient and would be legally compliant. Supporting evidence could have comprised use of Natural England's GCN rapid risk assessment tool in the GCN Mitigation Licence Method Statement template. Therefore, the Council has recommended throughout the	**Chapter 9 [REP7-021]):** all ponds are retained regardless of GCN presence within a minimum 10 m undeveloped buffer, increasing to a minimum 50 m where GCN are confirmed or, for unsurveyed off-site ponds, assumed present. The most suitable terrestrial habitats – hedgerows, ditches, woodland and field margins – are also retained and buffered (paragraph 9.10.236), with buffer protection detailed in the **Outline EPMS [REP7-083]**. Chapter 9 acknowledges that buffers alone are unlikely to avoid all impacts, as individual newts can occur beyond 50 m of breeding ponds. Additional measures at paragraph 9.12.26 therefore apply outside buffer zones: sensitive timing of vegetation removal, EcoCoW attendance at specified activities, and measures to prevent stored materials becoming sheltering features. These are detailed in the Outline EPMS and secured by DCO requirement.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Examination period that the ExA requests further information regarding the proposed GCN mitigation strategy for the Solar PV Sites, as well as further supporting evidence and a sound justification given that it has become apparent during the Examination that the Applicant has opted not to apply for any type of GCN mitigation licence despite the scale of the Scheme, the potential for adverse effects and the level of protection afforded to GCN, which utilise both aquatic and terrestrial habitat within the Solar PV Sites. Although the Applicant has provided responses to this point during the Examination, the decision not to apply for any kind of mitigation licence to facilitate works within the proposed Solar PV Sites has not been satisfactorily or robustly justified or addressed in the Council's view.	Given that the Solar PV Sites comprise largely suboptimal arable and agricultural grassland and that only 2 of 24 ponds supported GCN, no mitigation licence is currently intended for the Solar PV Sites. This is consistent with the approach on comparable consented solar DCOs, such as West Burton Solar Farm (EN010132).	
3.5.19	Baseline – breeding birds	Barn owls were recorded as possibly breeding across Solar PV Sites Lime Down A–E. Given the evidence, the Council would have expected species-specific survey for this Schedule 1	All buildings within the Order Limits will be retained and protected, with no direct impacts. Pre-construction barn owl inspections of buildings that may be subject to indirect impacts such as	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		species to have at least been carried out at the buildings within the Solar PV Sites. While Solar PV Sites support various breeding birds, no surveys were conducted within the Cable Route Corridor (CRC), with the justification that habitats would mostly be retained and temporary impacts reinstated. Given the CRC's scale, construction duration and methods, and temporary compounds, the Council would have expected breeding bird survey to have at least been undertaken at likely key habitats within the CRC. The rationale is deemed insufficient and does not fully recognise the potential for disturbance and displacement during the breeding season. The breeding bird assemblage at the Solar PV Sites and the CRC has been assessed as of District importance, however, this has been concluded without any breeding bird survey data having been collated for the CRC.	noise disturbance are secured by section 5.3 of the **Outline EPMS [REP7-083**], which provides for altering works – for example delaying until nesting is complete – to avoid impacts and ensure legal compliance. A precautionary, reasonable worst-case scenario has been assumed for breeding birds within the CRC in ES **Chapter 9 [REP7-021],** given the short-term and temporary nature of those works. The assemblage was evaluated on professional judgement, informed by the desk study, the detailed surveys at the Solar PV Sites and the similarity of habitats between the two areas.	
3.5.20	Baseline – overwintering birds	Although wintering bird surveys were undertaken at the Solar PV Sites, no wintering bird surveys have been	The evaluation of the overwintering bird assemblage with respect to the CRC was based on professional judgement	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		undertaken within the CRC and the DCO application assumes that the habitats within the CRC are of similar value for overwintering birds as those at the Solar PV Sites. Taking this approach could omit the recording of further protected wintering bird species, Birds of Conservation Concern (BoCC) and / or species of principal importance (SPI) and is therefore not supported by Wiltshire Council.	with consideration to the likely assemblage of birds given the findings of the desk study and detailed surveys conducted at the Solar PV Sites, and the recorded habitats present (particularly the similarity of habitats within the both the CRC and the Solar PV Sites). It is the Applicant's view that a suitably precautionary approach to the evaluation of the overwintering bird assemblage within the Order Limits has been made.	
3.5.21	Baseline White-Clawed Crayfish – Solar PV Sites and CRC	The Council had suggested that an evaluation greater than 'Local (assumed)' was appropriate. The re-evaluation to District Importance in the application is welcomed and the Council concurs with it in the absence of dedicated survey. Agreement relates to the valuation only. The Council has not at any point agreed that the absence of survey is acceptable.	The Applicant welcomes the Council's agreement of the evaluation ascribed to white-clawed crayfish.	**Agreed**
3.5.21a	Baseline White-Clawed Crayfish	The Council highlights in its Relevant Representation (January 2025) that	The Applicant considers that a precautionary and reasonable worst-	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
	– Solar PV Sites and CRC	there has been no specific survey undertaken for white-clawed crayfish within either the Solar PV Sites or the CRC despite suitable habitat for white-clawed crayfish being present in the form of Gauze Brook and Gabriel's Well watercourses in Lime Down D and E and in connected wet ditches. The species has therefore been assumed present throughout suitable habitat (Council's Relevant Representation).	case scenario has been assumed for the assessment of impacts on white-clawed crayfish within **ES Volume 1, Chapter 9 Ecology and Biodiversity [REP7-021**], whereby this species has been assumed to be present in all suitable habitat, based on a habitat appraisal. It is the Applicant's view that proposed embedded mitigation (such as adoption of trenchless technologies to avoiding impacting watercourses) or additional mitigation in the form of pre-construction surveys, micro-siting of works within the cable route corridor and adoption of biosecurity measures, all of which will be secured by the **Outline EPMS [REP7-083],** are entirely adequate for ensuring no significant residual impacts would occur in line with the conclusions of the assessment provided in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021].**	
3.5.22	HRA	The Council remains concerned at the complete absence of bat survey within the CRC and the lack of further bat survey of buildings at the Solar PV Sites with roost potential and reliance	The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising the	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		on static detector surveys and the overly wide scope of, and powers afforded by, Schedule 12 of the Draft DCO and implications for the soundness, accuracy and reliability of the assessment and conclusions presented within the HRA. The council has expressed that it is not evident that the HRA has been based on the worst case, as is required given that the Applicant is relying on the Rochdale Envelope approach. The council has repeatedly raised concern that although the proposed 10m maximum hedgerow removal restriction at each of a number of discrete locations in the area of the CRC that coincides with the 4km greater horseshoe consultation zone around a component of the Bath and Bradford-on-Avon Bats SAC is stated in the Outline EPMS, it is not stipulated in the corresponding rows of Schedule 12. This results in a lack of assurance and certainty that the measures proposed within the EPMS will be implemented, creating a lack of	**HRA Report [APP-275]** for the original DCO submission**.** Those surveys are now complete, as set out at 3.5.6, and the results do not alter the conclusions of the **HRA Report [REP3-090].** A reasonable estimate of calculated permanent and temporary hedgerow removal requirements is set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** (e.g. paragraph 9.10.1380) and shown on a plan within the **Outline EPMS [REP7-083]**. The Applicant acknowledges the final extent of permanent and temporary hedgerow removal cannot be determined until the detailed design stage. The estimates provided are however considered a reasonable precautionary, and likely worst-case scenario have been used to inform the assessment contained within the **HRA Report [REP3-090].** The Applicant has consulted Natural England on both the HRA process and the **HRA Report [REP3-090]** itself and notes an agreed position has been	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		certainty and consistency across the submitted documents. The Council has repeatedly expressed and maintains that at the very least, bat survey within the areas of potentially suitable habitat and functionally linked land (FLL) in the section of the CRC that coincides with the greater horseshoe bat consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats SAC should have been undertaken. This would have served to ensure that the ES and HRA were sufficiently evidence-based, robust and accurate and that conclusions could truly be drawn beyond reasonable scientific doubt. Given that parties are at an impasse on this matter, the Council defers to Natural England given their role as the statutory nature conservation body and the government's primary advisor on the natural environment. This is also	reached between Natural England and the Applicant on HRA matters.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		set out in the Council's Closing Statement.		
3.5.23	Assessment Results	The Council considers that ecological impacts, particularly during construction within the cable route corridor, are consistently underestimated with an over-reliance on impacts within the CRC being categorised primarily as temporary.	The Applicant considers the assessment results set out within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]**, including likely significant effects anticipated, are acceptable. In particular, the Applicant considers the assessment in relation to the Cable Route Corridor has been undertaken applying a proportionate and precautionary approach that reflects the realistic worst-case construction scenario within the Rochdale Envelope. The assessment is based on the maximum reasonable construction footprint, duration and severity of works, and considers receptors for which there is a plausible pathway for impacts. The Applicant does not agree assessment has resulted in an under-estimation of effects. The baseline information is considered sufficient to support a robust and proportionate assessment of likely significant effects within the Cable Route Corridor, and	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** remain appropriate and justified.	
3.5.24	Potential impact on Bechstein's bats	Wiltshire Council noted that paragraph 3.3.15 of the ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] lists bat roost records within 2 km of the Compensatory Receptor Sites (CRC) obtained through a desk study. They recommend that the Bechstein's bat core maternity roosts located to the south of Chippenham, for which the council's ecology team provided a Technical Briefing Note (2 October 2024),) also be included in paragraph 3.3.15, as these roosts are situated within 2 km of the CRC. The council expressed concern regarding the absence of bat activity surveys conducted in the CRC. Wiltshire Council acknowledged the precautionary approach outlined in paragraph 1.3.24 of the ES Volume 3, Appendix 9-3 Bat Survey Report [APP-200] concerning the Bechstein's bat	As set out at 3.5.14, the approximate roost location has been noted at paragraph 9.7.15 of **ES Chapter 9 [REP7-021]** and paragraph 1.3.8 of **Appendix 9-3 [APP-200],** and has been fully considered in the assessment. Bat activity survey within the CRC is not considered essential. Given the short-term and temporary works, the localised footprint (approximately 25 m plus temporary compounds) and the absence of permanent operational effects, impacts including temporary habitat loss, disturbance and fragmentation have been assessed on a precautionary, reasonable worst-case basis from the habitat appraisal undertaken. The mitigation secured by DCO requirement is appropriate to ensure no significant residual adverse impacts on Bechstein's bats.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		core maternity roosts near Lackham, south of Chippenham. These roosts have been assumed to be functionally and demographically linked to the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC).) in accordance with the Technical Briefing Note provided by the Council (2 October 2024). See also 3.5.14 and 3.5.15.		
3.5.25	Mitigation	There is an inconsistency in the ES regarding embedded ecological mitigation within the Cable Route Corridor: while buffers from field boundary habitats are proposed (stating these will not contain any array structures, hard standing or electrical hardware), other ES sections state that cables and fibre chambers will typically be routed along field boundaries. This approach would prevent effective buffering and is likely to increase impacts on sensitive habitats such as hedgerows, trees and field margins, raising concerns that ecological	It is the Applicant's view that there is no inconsistency regarding the application of embedded mitigation measures within the Cable Route Corridor (CRC) and the relationship between **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** and **ES Volume 1, Chapter 2: The Order Limits [APP-054]**. The reference in Chapter 2 to routing cables towards the edge of fields reflects an indicative design principle intended to reduce land take and disruption to agricultural operations where practicable. It does not override or negate the embedded mitigation	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		impacts within the CRC have been underestimated. The proposal to implement ecological buffers along field boundaries is welcomed, with no infrastructure within them. However, routing cables to the edges of fields within the CRC, as proposed, would intrude into these buffer zones, potentially damaging important hedgerows and trees, and conflicts with the Applicant's own mitigation measures. The Council's relevant representation (submitted 9 January 2026) should be read alongside this SoCG for full details of the discrepancy between ES chapters which should be clarified and rectified, and the Council's concerns regarding this issue. As agreed during a meeting on 7 October 2026, on the basis that all documents and relevant ES Chapters are appropriately amended to clarify and rectify the discrepancy only, the matter can be considered Agreed.	measures set out elsewhere within the Environmental Statement. Within the CRC, the ecological buffers described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021**] will be implemented where practicable, informed by detailed design and local site conditions. Notwithstanding this, all tree and hedgerow Root Protection Areas (RPAs) will be respected, and works will be designed to avoid encroachment into RPAs in accordance with best practice arboricultural guidance. Hedgerows, hedgerow trees and associated field boundary habitats are therefore afforded protection irrespective of the final cable alignment. Where routing adjacent to field boundaries is proposed, this will be subject to detailed assessment at the construction stage to ensure that unacceptable ecological or arboricultural effects are avoided. This will be secured through the **Outline EPMS [REP7-083**] and **Outline Arboricultural Method Statement**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			[REP7-039], which will define working methods, exclusion zones and protection measures as appropriate. A risk-based approach to micrositing of the final cable route will take into account the presence of priority habitats and habitat of suitability for various protected species and species of conservation concern. In accordance with the **Outline Arboricultural Method Statement [REP7-039]** and Table 4 of the **Outline CEMP [REP7-073],** arboricultural protection and mitigation measures will be implemented to safeguard retained trees and hedgerows within the Cable Route Corridor. All retained trees will be protected by tree protection fencing throughout construction where appropriate. Where works are required within Root Protection Areas (RPAs) of retained trees, suitable ground protection will be installed in accordance with BS 5837:2012 to prevent soil compaction, with the specification proportionate to the anticipated loading. Cable	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			installation works will be microsited to avoid RPAs wherever practicable. Where works within RPAs cannot be avoided, the Arboricultural Clerk of Works (ACoW) will oversee appropriate precautionary measures, such as hand digging and root pruning, to minimise root disturbance and avoid damaging retained trees. These measures are identified in Table 3-4 of the **Mitigation Route Map [REP7-110]** which sets out how these actions will be implemented and secured. The Applicant has agreed to update the **Outline EPMS [REP7-083]** at Deadline 8 to include the above measures which are already captured in the **Outline Arboricultural Method Statement [REP7-039].**Accordingly, the Applicant does not agree that routing cables towards field edges inherently increases ecological impacts, nor that there is a conflict between **ES Volume 1, Chapter 9:Ecology and Biodiversity [REP7-021]** and **ES Volume 1, Chapter 2: The Order Limits [APP-054]**. The final alignment within the CRC will be determined	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			through detailed design, applying the mitigation hierarchy and ensuring protection of sensitive ecological and arboricultural features.	
3.5.26	Mitigation – Site Accesses	The Council supports the intention to utilise existing accesses as far as practicable notwithstanding the Council's concerns regarding the Draft DCO Schedule 12 Part 1 and 2 and the flexibility it affords regarding extent of potential removal.	The Applicant considers the approach set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** to utilising existing site accesses where practicable is acceptable.	**Agreed**
3.5.27	Mitigation – Temporary Construction Compounds	The Council welcomes the proposed approach that no temporary construction compounds are located within the greater horseshoe bat SAC consultation zone associated with the Box Mine component of the Bath and Bradford-on-Avon Bats SAC.	The Applicant welcomes the Council's corroboration of this approach.	**Agreed**
3.5.28	Additional Mitigation - Breeding Bird Mitigation – Solar PV Sites (Paragraphs 9.77–9.81)	The ES relies on creating diverse grassland under and between panels to mitigate displacement of ground-nesting birds, principally skylark and yellow wagtail. The Council has consistently advised, first in its response to the PEIR, that only	The Applicant agrees that, taking a precautionary approach, grassland expected to establish within and beneath panels has been assumed to represent modified grassland and a consistent approach has been taken between the **BNG Assessment Report [REP7-068]** and **ES Volume 1,**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		modified grassland of poor condition should be assumed in these areas. That assumption is correctly applied in the **BNG Assessment Report [APP-273]** but not in **Chapter 9 [APP-061].** The additional mitigation at paragraphs 9.12.31–9.12.32 therefore assumes greater benefits than are likely to be delivered, skewing the impact assessment and undermining confidence in the mitigation. The requirements attaching to reliance on the Rochdale Envelope are also relevant here. Separately, the substantive displacement of these ground-nesting species will not be wholly mitigated or offset by provision of foraging habitat: displaced birds still require suitable open areas in which to nest, and foraging habitat is not like-for-like compensation for lost nesting habitat (see the Council's Written Representation).	**Chapter 9: Ecology and Biodiversity [REP7-021]** in this respect. However, it is the Applicant's view that modified grassland can nonetheless provide valuable skylark foraging habitat compared with the intensively managed arable cropland that currently comprises most of the Solar PV Sites. Once established it will be under a low-intensity management regime secured by the **Outline LEMP [REP7-081]**, providing year-round seed, plant and invertebrate resources rather than the seasonal availability associated with arable cropping. Skylarks, and particularly chicks, depend heavily on insects and spiders in summer. Pesticide use will be avoided at the operational scheme, as specified in the **Outline LEMP [REP7-081**], and ceasing the regular applications associated with current arable use can be expected to increase invertebrate prey abundance and diversity. Grassland within buffer zones is likely to provide greater foraging resource still.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Skylarks have been observed gathering food within operational solar farms and leading young into them. While it is assumed they will typically avoid nesting within solar farms, their foraging requirements are less exacting. The additional mitigation at paragraphs 9.12.31 and 9.12.32 in **ES Chapter 9 [REP7-021]** is therefore considered deliverable.	
3.5.29	Assessment of cleaning of solar panels during the operational phase	Wiltshire Council's statutory consultation response highlighted that the ES should assess the potential for the cleaning and maintenance of the solar panels to result in adverse effects to ecological receptors, particularly the habitats and ground flora within the Solar PV Sites. In terms of the DCO application, the cleaning of solar panels has now been discussed in paragraphs 3.5.26 - 3.5.28 of ES Volume 1, Chapter 3: The Scheme [APP-055] and an annual cleaning cycle has been assumed. However, the suggested likely cleaning frequency set out in [APP-055] doesn't align with that suggested in ES Volume 1, Chapter 9:	The inconsistency within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** and **ES Volume 1, Chapter 3: The Scheme [APP-055]** is acknowledged. The assessment and conclusions in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP7-021]** have been reviewed assuming an annual cleaning cycle and the text has been updated accordingly at paragraph 9.10.103. However as this is a is small increase and represents a worst case scenario (some sites can operate without the need to be cleaned), this does not change the conclusions presented in **ES Volume 1, Chapter 9:**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Ecology and Biodiversity [APP-061] which states in paragraph 9.10.178 that the cleaning of the panels would be infrequent and likely to be no more than every two years. It is therefore recommended that this operational activity is reviewed, and that Chapter 9 assumes an annual cleaning cycle in the interests of being suitably precautionary. The Council subsequently highlighted in a representation that the assessment hadn't been adjusted to account for Chapter 9 now specifying that the cleaning cycle would be annual, thereby increasing likelihood for adverse effects on ground flora, habitats and so forth.	**Ecology and Biodiversity [REP7-021]**.	
3.5.30	Outline Ecological Protection and Mitigation Strategy (Outline EPMS)	Wiltshire Council raised concerns regarding the oEPMS in its **Responses to the ExA's second written questions (ExQ2) [REP5-112]**, notably in respect of Method Statement 13. These concerns were again raised by the Council's ecology officer during ISH8 in response to this matter being specifically raised by the ExA.	The proposed ecological protection measures set out within the **Outline EPMS [REP7-083]** are correctly identified and considered appropriate for protecting habitats and species during the construction phase.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council remains concerned regarding this issue given that the revised oEPMS submitted at Deadline 7 **[REP7-084]** does not include any revisions to Method Statement 13 in order to address the points raised by Wiltshire Council and discussed during ISH8. For these reasons, this matter remains outstanding and not agreed. Further detail regarding the issue is provided in the Council's Closing Statement and also in **[REP5-112]**.		
3.5.31	Outline Construction Environmental Management Plan (Outline CEMP)	During ISH7, the council's ecology officer suggested that if monitoring during HDD beneath watercourses were to identify the need for adaptive / additional measures to avoid and mitigate impacts on ecological receptors, that this will need to be swiftly formulated and agreed with the EA, the LLFA and council's ecology team as appropriate, and implemented. Revision 8 of the oCEMP **[REP7-074]** submitted at Deadline 7 has been amended as a result of the discussion and points raised by the council during	Following matters raised by Wiltshire Council and discussed during ISH7, additional text was added to Table 3 of the **Outline CEMP [REP7-073] (Revision 8)** at Deadline 7 to consolidate the approach to Horizontal Directional Drilling (HDD) works. In accordance with the **Outline EPMS [REP7-083]**, an EcoCoW will agree the timing and location of HDD operations in advance of works and attend each operation. Should a risk to species or habitats be identified, for example as a result of excessive vibration or sediment release, advice from the	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		ISH7 and the associated action points assigned to the Applicant by the ExA. Whilst the revisions are welcomed, it is deemed that they do not wholly address or fulfil the council's requirements as although it is specified that advice may need to be sought in the event that a risk to species or habitats is identified, there is no mention of the potential need to determine and implement additional mitigation measures where necessary. The acquisition of advice will not in itself avoid and mitigate impacts on ecological receptors, and it may prove necessary to undertake supplementary mitigation and /or remedial measures. As such, the council considers this should be duly acknowledged and mentioned within the oCEMP. Furthermore, the revised wording in Table 3 does not indicate that advice would be sought from the council's ecology team where appropriate in addition to the other parties mentioned.	Environment Agency, LLFA, or a suitably qualified hydrological specialist will be obtained as appropriate	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Wiltshire Council's ecology officer has repeatedly raised concerns in previous representations regarding use of the access track aligning the North Bincombe Wood, which comprises an ancient woodland, and has highlighted that the track lies within the requisite 15m buffer from the woodland edge. Therefore, use of this track during construction would result in there effectively being no 15m buffer alongside the ancient woodland despite this being a requirement. In ISH7, the council's ecology officer noted that despite the wording in Table 4 of the oCEMP, the access track alongside North Bincombe Wood continued to be shown as a proposed access route on submitted plans. Therefore, concern remained regarding the scope of use of the access track during construction. The council notes that Table 4 in the revised oCEMP **[REP7-074]** submitted		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		at Deadline 7 no longer includes the following text: *"..use of the access track and access by the undertaker, its contractors or agents where reasonably necessary to undertake activities required to comply with, or discharge, its legal or statutory obligations in connection with the authorised development."* The council welcomes removal of this text from Table 4.		
3.5.32	Outline Operational Environmental Management Plan (Outline OEMP)	The revised oOEMP **[REP7-076]** submitted at Deadline 7 hasn't been revised to address all the matters raised by Wiltshire Council during ISH7. Further details regarding the issues are provided in the council's Closing Statement.	Following matters raised by Wiltshire Council and discussed during ISH7, additional text was added to Table 3 of the **Outline OEMP [REP7-075] (Revision 8)** at Deadline 7 to clarify the approach to managing any newly created badger sett identified during operation. This confirms that retaining any newly created badger sett in situ is the preferred option, with exclusion and closure under licence used only as a last resort. Following matters raised by Wiltshire Council and discussed during ISH7, the	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			wording in Table 3 of the **Outline OEMP [REP7-075] (Revision 8)** was amended for Deadline 7 to clarify the approach to adaptive skylark mitigation. The revised wording confirms that monitoring of ground-nesting bird mitigation habitat will focus on ensuring that optimal habitat conditions are maintained within mitigation areas. Given the range of environmental factors that can influence skylark abundance and breeding success between years, monitoring breeding pair numbers as a trigger for remedial action is not proposed	
3.5.33	Outline Landscape and Ecological Management Plan (Outline LEMP)	The revised oLEMP submitted at Deadline 7 **[REP7-082]** does not fully address all the concerns and issues raised by Wiltshire Council in representations. Further details regarding the issues are provided in the council's Closing Statement	The principles for managing retained and newly-created habitats and ecological features during the operation and maintenance phase, set out in the **Outline LEMP [REP7-081]** are correctly identified and appropriate.	**Not Agreed**
3.5.34	Biodiversity Net Gain (BNG)	Wiltshire Council has provided detailed comments on BNG and the BNG metric submitted in March 2026 in its Written	BNG for NSIPs is not yet mandatory, but the Applicant has sought to meet the requirements as if it were. The	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Representation (submitted at Deadline 1) and has raised a number of issues. At present, therefore, the Council has concerns regarding the BNG submissions. Wiltshire Council has reviewed **[REP3-086] 7.8 Biodiversity Net Gain Assessment Report (Rev 3) (Tracked), [REP3-088] 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 3) (Tracked) and [REP3-089] 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 3) (Excel Format)** submitted at Deadline 3 and it evident that no revisions have been made to the aforementioned submissions that address or overcome the observations raised by the Council. During ISH3 on 2nd July 2026 the Inspector raised the matter of the detailed observations regarding the BNG Assessment and Statutory	approach to assessing and securing BNG, which is detailed in the **BNG Assessment Report [REP7-068]**, is considered acceptable. Plates 3-7 and Plates 13-24 of the **BNGAssessment Report [REP7-068]** set out the baseline conditions across the Scheme used for the BNG calculations, as stated in the Council's comment. The baseline data are derived from comprehensive UK Habitat Classification surveys undertaken by experienced surveyors and following the precautionary principle; detailed methodology and survey personnel are set out within **ES Volume 3, Appendix -.1: Ecological Baseline Report [REP4-019]**. Plates 8-12 of the **BNG Assessment Report [REP7-068]** and **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP7-034 to REP7-037]** set out the habitat proposals for the Scheme. These plans reflect anticipated habitat loss and proposals for habitat creation and enhancement measures. Habitat loss has been	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Biodiversity Metric that were made by Wiltshire Council in the Written Representation submitted at Deadline 1 **[REP1-138]**. Observation 1 was discussed during ISH3, and this matter is considered resolved. The remaining observations (2-11) are set out in the matters below.	calculated based on worst-case scenarios; for example, the maximum width of hedgerow crossings has been applied at every cable route crossing point, in line with the maximum widths set out in Section 2.4 of the Outline Ecological Protection and Mitigation Strategy (EPMS). **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [REP7-032]** provides a worst-case scenario for the proposed area-based habitat losses within the Scheme, as the maximum extent of panel coverage and permanent (for the duration of the Operational phase) infrastructure has been applied. The BNG calculations presented within the **Statutory Biodiversity Metric [REP7-070]** and **BNG Assessment Report [REP7-068]** reflect a reasonable worst-case scenario, in line with the overarching methodology for the entire Development Consent Order (DCO) application.	
3.5.35	Biodiversity Net Gain (BNG)	Observation 2	The Applicant acknowledges that Habitat Reference numbers provide a useful tool with which the **Statutory**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• The submitted BNG Metric [PDA-008] does not include habitat reference numbers across the relevant habitat, hedgerow and watercourse tabs, preventing clear cross-referencing between metric calculations and the associated baseline and proposed habitat plans. Despite the Applicant's explanation that habitat parcels were consolidated due to the large number of polygons generated, this is not considered a sufficient justification for their omission. As a result, the Council's Ecology Officer has been unable to verify or corroborate the BNG Metric and BNG Assessment Report [APP-273] with the necessary level of confidence, limiting the robustness of the review and the evidential basis underpinning the scheme's ecological impact assessment and habitat mitigation, creation and enhancement proposals.	**Biodiversity Metric [REP7-070]** could be compared to associated baseline and proposed habitat mapping, and the content of the **Biodiversity Net Gain Assessment (BNG) Report [REP7-068]**. Owing to the sheer number of individual habitat parcels (2,229 for Habitat Units alone), the data were consolidated within the **Statutory Biodiversity Metric [REP7-070]**, in accordance with the Statutory Biodiversity Metric QGIS Template and GIS Import Tool – User Guide. Consolidation of data is recognised as a limitation to the assessment, however, in the Applicant's view, sufficient justification for this decision has been provided. It should be noted that un-consolidated habitat data would not fit within a single Metric	
3.5.36	Biodiversity Net Gain (BNG)	Observation 3	As set out within the **Biodiversity Net Gain (BNG) Assessment Report**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• The submitted BNG evidence lacks sufficient transparency and verifiability because only the combined Solar PV Sites and cable route corridor (CRC) metric was provided, while the separate Solar PV Sites metric referenced in the BNG Assessment Report [APP-273] and a standalone CRC metric were not submitted. Combined with the absence of habitat reference numbers, this prevents effective interrogation of the calculations, verification of habitat and hedgerow losses, reinstatement and enhancement measures within the CRC, and confirmation that biodiversity unit calculations, habitat creation assumptions and hedgerow gains/losses have been accurately recorded and not double counted.	**[REP7-068]**, the BNG assessment has been calculated based on the Order Limits in order to reflect the total net change in biodiversity units across the Scheme. The **Statutory Biodiversity Metric [REP7-070]** includes baseline and proposed habitats within the Solar PV Sites and Cable Route Corridor (CRC). Within the **BNG Assessment Report [REP7-068]**, the headline results were provided from Metric calculations completed for the Solar PV Sites only alongside the assessment of the Order Limits to illustrate that the bulk of habitat creation and enhancement measures are proposed within the Solar PV Sites. This inclusion was intended as a useful indicative reference, to provide context as to the extent and proportion of net gains proposed in different elements of the Scheme. The individual calculations for the Solar PV Sites have not been submitted as part of the Development Consent Order (DCO) application, as	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			the BNG proposals submitted relate to the Scheme as a whole. Justification for the consolidation of habitat rows within the **Statutory Biodiversity Metric [REP7-070]** and subsequent omission of individual habitat parcel references is provided in the relevant response above. The Applicant confirms that all hedgerows to be temporarily removed within the CRC have been treated as lost, followed by creation on reinstatement as set out in paragraph 1.8.2 of the **BNG Assessment Report [REP7-068]**.	
3.5.37	Biodiversity Net Gain (BNG)	Observation 4 • Condition assessment sheets and detailed habitat condition assessment information have not been provided alongside the BNG Metric or within the BNG Assessment Report [APP-273], contrary to the expectations of the Statutory Biodiversity Metric User Guide. Although the applicant cites the large number of habitat parcels	Figures showing the baseline and proposed habitats are provided in Plates 3 - 24 at the end of the **Biodiversity Net Gain (BNG) Assessment Report [REP7-068]**. Given the sheer number of area and linear habitat parcels present across the Scheme, it was not considered proportionate to provide each condition assessment individually for submission. However, a summary of the condition assessment scores for each specific	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		as justification, no evidence has been provided to demonstrate that this approach is supported by guidance. Consequently, the Council's Ecology Officer has been unable to verify the condition assessments assigned to habitats within the metric, reducing confidence in the robustness and accuracy of the biodiversity calculations.	habitat, hedgerow and watercourse type is provided in Tables 2 and 3 in the **BNG Assessment Report [REP7-068]**. The Applicant acknowledges that this approach deviates from the guidance set out within The Statutory Biodiversity Metric User Guide (Feb 2024; updated June 2026). This decision was based on professional judgement, consideration of the scale of the Scheme, and recognition that a BNG assessment has been provided alongside the Development Consent Order (DCO) application beyond what is statutorily required of NSIP developments.	
3.5.38	Biodiversity Net Gain (BNG)	Observation 5 • The Council note that 17ha of the CRC had not been surveyed prior to the production of the BNG assessment report.	The Applicant can confirm updated versions of the **Statutory Biodiversity Metric [REP7-070]** and **BNG Assessment Report [REP7-068]** were submitted at Deadline 1 following completion of baseline surveys within the Cable Route Corridor.	**Agreed**
3.5.39	Biodiversity Net Gain (BNG)	Observation 6	The MMUs were determined from Section 2.2 of the UK Habitat	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• The BNG Assessment Report [APP-273] applies relatively large minimum mapping units (MMUs) of 400m² for area habitats and 20m for linear features, resulting in smaller habitat parcels not being individually mapped or included within the metric. The Council is concerned that this approach may reduce the accuracy of the baseline assessment by overlooking or subsuming smaller, higher-value habitats, potentially affecting biodiversity unit calculations and the claimed margin of error. Furthermore, although the approach is stated to be consistent with UKHab guidance, no specific references or robust evidence have been provided to demonstrate that the adopted MMUs are supported by published guidance or are appropriate for the habitats present across the Scheme, limiting the ability to verify the validity of the methodology.	Classification User Manual v1.0 (May 2018), which recommends a fine-scale MMU (25 m², 5 m length) where detailed mapping of small features is required, such as urban or small-scale rural projects and designated site surveys, and a large-scale MMU (400 m² polygon, 20 m length) for landscape-scale survey or where data are collected at broader scales. UKHab v2.0 (2023) supersedes v1.0 but provides no specific guidance on MMU size, and the Applicant is aware of no alternative published guidance from UKHab Ltd or another professional body. Applying the most recent MMU-specific guidance, taking account of site size and scheme context, was therefore considered the most appropriate and robust basis for consistent habitat mapping. See also the response to WC-069 at pages 146–150 of the **Applicant's Response to Written Representations [REP2-039].**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.5.40	Biodiversity Net Gain (BNG)	Observation 7 • The BNG Assessment Report [APP-273] does not explain whether or how the stated minimum mapping units (MMUs) were applied to the Cable Route Corridor (CRC), nor does it provide a specific methodology or justification for their use in this narrower and more linear part of the Scheme. Given that the metric includes the CRC, the Council considers that the MMU approach should be clearly documented and consistently applied across the Order Limits, with robust evidence demonstrating its appropriateness. In the absence of this information, and given existing concerns regarding the MMUs adopted for the Solar PV Sites, the validity and accuracy of the habitat mapping and biodiversity calculations for the CRC cannot be readily verified.	The Applicant can confirm that the Minimum Mappable Unit of 400m^2 for area-based habitats and 20m for linear features applied across the Solar PV Sites was also applied within the Cable Route Corridor (CRC) to ensure consistency across the Scheme. Justification for the use of the defined MMU is provided in the relevant response to Observation 6 above, and it is the Applicant's view that the MMU applied, and habitat data collected, within both the Solar PV Sites and CRC reflect the baseline ecological conditions in sufficient detail to support a robust assessment.	**Not Agreed**
3.5.41	Biodiversity Net Gain (BNG)	Observation 8	The Applicant acknowledges that all individual trees comprising	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• The submitted BNG Metric [PDA-008] does not comply with the Statutory Biodiversity Metric User Guide in its treatment of irreplaceable habitats, as all 52 recorded ancient and veteran trees across the Solar PV Sites and Cable Route Corridor have been grouped into a single row rather than recorded individually. No justification for this approach has been provided in the metric or BNG Assessment Report [APP-273], despite the User Guide requiring each tree to be entered separately. Furthermore, the methodology used to derive the baseline veteran tree area of 3.10 hectares is unclear, particularly as the Tree Helper tool does not appear to have been completed, limiting the Council's ability to verify the accuracy and robustness of the metric calculations relating to these irreplaceable habitats. The Council recognises the Deadline 7 submissions. As discussed during a meeting on 7 October 2026, it would have been	Irreplaceable Habitat have been grouped within a single row within the **Statutory Biodiversity Metric [REP7-070]**. These features were consolidated within the Metric, as with other habitat elements within the Scheme. The Applicant has reviewed the data and can confirm that 50 ancient and veteran trees recorded within the Solar PV Sites and Cable Route Corridor (CRC) and listed within the Irreplaceable Habitats tab of the **Statutory Biodiversity Metric [REP7-068]** comprised the following individual trees: Solar PV Sites: • 2 medium trees in 'Good' condition (0.0326ha); • 12 large trees in 'Good' condition (0.4397ha); and • 27 very large trees in 'Good' condition (2.0643ha). CRC:	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		prudent for the limitations of the metric and that it will only display a maximum of 22 irreplaceable habitat features, to have been discussed in the updated BNG Assessment Report for the purposes of clarity and completeness.	• 5 large trees in 'Good' condition (0.1832ha); and • 4 very large trees in 'Good' condition (0.3058ha). The total of area of 3.02 ha comprises a sum of the above area measurements, derived from the 'Tree Helper' within the Metric. <u>Updated Position</u> The Applicant has updated the **Statutory Biodiversity Metric [REP7-072]** at Deadline 7 of the Examination. All ancient and veteran trees considered to be 'irreplaceable habitat' have been separated into individual features within Tab A-1 'On-Site Habitat Baseline'. Additional plans (Plate 25 to Plate 29) have been inserted into the **Biodiversity Net Gain Assessment Report [REP7-068]** to show the location of all ancient and veteran trees reference within the **Statutory Biodiversity Metric [REP7-072]**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			The Applicant notes that the Irreplaceable Habitats sheet within the **Metric [REP7-072]** is automatically populated from the 'A1 On-Site Habitat Baseline' tab and cannot be edited manually. Due to an inherent design limitation of the Metric tool which cannot be amended by the Applicant, the sheet displays a maximum of 22 irreplaceable habitat features and therefore only shows the first 22 of the 50 ancient and veteran trees recorded. However all 50 trees remain included and recorded within the **Metric [REP7-072]** calculations as per tab 'A1 On-Site Habitat Baseline.	
3.5.42	Biodiversity Net Gain (BNG)	Observation 9 • The submitted BNG Metric [PDA-008] does not fully comply with the Statutory Biodiversity Metric User Guide for Individual Trees habitats, as several habitat parcels (baseline references 46, 48 and 49 on the A-1 On-Site Habitat Baseline tab, and habitat reference 11 on the A-2 On-Site Habitat Creation tab) have blank User Comments fields. As the	The Applicant has confirmed that the number of individual trees corresponding to Baseline Habitat References 46, 48 and 49 within the **Statutory Biodiversity Metric [REP7-072]** are as follows: Habitat Reference 46: • 7 small trees in 'Good' condition (0.0285ha);	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		User Guide requires the number of trees contributing to each Individual Trees habitat area to be recorded in the User Comments, the omission of this information limits transparency and prevents verification of the accuracy of the habitat area calculations.	• 20 medium trees in 'Good' condition (0.3257ha); • 36 large trees in 'Good' condition (1.3192ha); and • 19 very large trees in 'Good' condition (1.4526ha). Habitat Reference 48: • 2 medium trees in 'Moderate' condition (0.0326ha); and • 2 very large trees in 'Moderate' condition (0.1529ha). Habitat Reference 49: • 5 medium trees in 'Good' condition (0.0814ha); and • 1 large tree in 'Good' condition (0.0366ha). All proposed individual trees within the Scheme (659 total) have been prescribed a tree size class of 'small' and target condition of 'Moderate', as set out within Paragraph 1.7.38 of the **Biodiversity Net Gain (BNG) Assessment Report [REP7-068]**. Classification of all proposed individual	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			trees as 'small' in size is in line with best practice guidance set out on Page 61 of The Statutory Biodiversity Metric User Guide (Feb 2024; last updated June 2026).	
3.5.43	Biodiversity Net Gain (BNG)	Observation 10 • The submitted BNG Metric [PDA-008] contains a Trading Rules failure for the Cropland broad habitat group, with losses of medium distinctiveness habitats (including arable field margins for game bird mix and pollen and nectar) not fully offset by gains at the required distinctiveness level. Although the BNG Assessment Report [APP-273] justifies this on the basis that proposed grassland and set-aside habitats will provide equivalent ecological functions and therefore achieve compliance in real-world terms, the absence of habitat reference numbers and clear cross-referencing between the metric and associated plans limits the ability to fully verify and scrutinise this conclusion,	The Applicant notes the Council's view regarding the rationale provided to address Trading Rule errors within the **Biodiversity Net Gain (BNG) Assessment Report [REP7-068]** appears to be reasonable. Justification for the consolidation of habitat rows within the **Statutory Biodiversity Metric [REP7-072]** and subsequent omission of individual habitat parcel references is provided in the relevant response for Observation 2 above.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		notwithstanding that the rationale appears reasonable in principle.		
3.5.44	Biodiversity Net Gain (BNG)	Observation 11 • The Council has consistently advised that the BNG Assessment and metric should assume that only modified grassland in poor condition is achievable beneath and between the solar panels. Although the habitat plans included within the BNG Assessment Report [APP-273] appear to broadly reflect this approach and paragraph 1.7.33 sets out grassland habitat types and target conditions consistent with the Council's expectations, the absence of habitat reference numbers linking the metric to the plans prevents detailed verification that this assumption has been applied consistently across the entirety of the Solar PV Sites.	All grassland beneath and between the panels is proposed as modified grassland of poor condition. Where grassland exists at baseline within the Solar PV Sites, it is assumed lost within panel areas during construction and subsequently created, as set out at paragraph 1.7.8 of the **BNG Assessment Report [REP7-068];** creation proposals for areas beneath and between panels are at paragraph 1.7.33. This precautionary approach reflects Clarkson and Woods' experience monitoring operational solar farms in the UK and is in line with the Council's expectations. Paragraph 1.2.8 of the Report records that baseline and proposed habitat data have been consolidated within the **Metric [REP7-072]** in accordance with the Statutory Biodiversity Metric QGIS Template and GIS Import Tool User Guide, which precludes assignment of individual parcel references between	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			the QGIS mapping and the Metric, as addressed at Observation 2 (3.5.32). The Applicant considers the **BNG Assessment Report [REP7-068];** provides sufficient assurance as to grassland condition beneath and between the panels without parcel references. The proposals in the **BNG Assessment Report [REP7-068];** and **Metric [REP7-072]** will be secured by DCO requirement.	
3.5.45	Targeted consultation	The Council has consistently raised concerns about the following changes that formed part of a targeted consultation: • Change 7: South West of Rodbourne, Lime Down E where works have potential to impact the edge of an ancient broadleaved woodland / priority habitat / HPI that is known as North Bincombe Wood and is also designated as a CWS named Rodbourne Plantation The Council's stance is that this matter has not been overcome or suitably addressed to date. The Council	Regarding Change 7 at North Bincombe Wood, the treatment of this area has been amended by the Applicant so that an alternative construction access track has been proposed to maintain a minimum 15 m buffer from the boundary of the North Bincombe Wood ancient woodland, and ensure impacts on the woodland here are avoided. Where the existing track lies within the 15 m buffer from North Bincombe Wood, any upgrades to the existing track will follow a specialist 'no-dig' construction methodology and	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		remains particularly concerned about the potential for adverse effects upon, and damage to North Bincombe ancient woodland which has been subsumed into the Order Limits boundary, and in turn the potential for adverse effects upon species that use the woodland.	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 lies within the 15 m buffer zone of the North Bincombe Wood ancient woodland. The **Outline CEMP [REP7-073]** and **ES Volume 2, Figure 3-4-5.1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [REP7-034 to REP7-037]** have been updated to reflect this change, see matters 3.6.7, 3.6.12, 3.6.17, and 3.6.21where control of works around Bincombe Wood are discussed.	
3.5.45a	Targeted consultation	In the council's Targeted Consultation response it also raised concern about: • Change Location 10: A429 / B4014 Roundabout where the potential for impacts to traditional orchard priority habitat / HPI should be determined and addressed, where necessary	The Traditional Orchard referred to with reference to Change Location 10 lies within a private residential property and is outside of the Order Limits, beyond an existing road verge. Change Location 10 refers to a Highway Improvement Area, which as stated in paragraph 3.2.5 of **ES Volume 1,**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		However, following review of further information from the Applicant, the council is satisfied that the proposals will not encroach on the traditional orchard priority habitat.	**Chapter 3: The Scheme [APP-055]** comprises a section of the highway network which will be subject to localised improvements. Any such works at this location would not extend into the curtilage of the private property and thus no impacts to the Traditional Orchard within are anticipated.	
3.5.46	Draft DCO - Schedule 12 – Hedgerows to be Removed	The Council has consistently raised concern regarding the Draft DCO. These issues have most recently been set out in detail in the Council's Written Representation (submitted at Deadline 1) which should be read alongside this SoCG. The Council notes the Applicant's Position Statement regarding the controls secured by the outline EPMS, but therefore continues to question why the level of flexibility afforded by Schedule 12 Part 1 and 2 is necessary if the scheme design is sufficiently refined and progressed and works will largely accord with the Hedgerow Removal Plan at Annex A. The Council remains concerned regarding this issue and maintains its stance regarding the scope of	The **Outline EMPS [REP7-083]** contains the Hedgerow Removal Plan at Annex A. This is in turn secured by Requirement 8 within the **Draft DCO [REP7-007].** As such, breach of the controls within the Hedgerow Removal Plan would be a criminal offence. It is the Applicant's view therefore that it is not necessary to include controls in relation to hedgerow removal within the main body of the DCO.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Schedule 12 being too broad and all-encompassing.		
3.5.47	Draft DCO - Other Matters	If the expectation is that Wiltshire Council will carry out all monitoring and compliance obligations during the lifetime of the Scheme, for example in relation to monitoring of the efficacy of ecological mitigation strategies, the LEMP or delivery of BNG, it will be necessary for an appropriate monitoring and compliance fee / financial contribution(s) and is index linked to be secured. Given the substantive scale of the Scheme together with the duration of the operational phase, it is requested and strongly advised that Wiltshire Council is party to the discussions on this matter.	With regard to monitoring the Applicant has provided its response in matter 3.2.15 above.	**Agreed**

3.6 Arboriculture

Table 3-6: Arboriculture

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.6.1	Legislation and Policy	Wiltshire Council is satisfied with the Legislation and Polices applied for the Environmental Impact Assessment for Arboriculture.	The Applicant considers that **ES Volume 1, Chapter 10: Arboriculture [APP-062]** has identified and appropriately considered all applicable legislation and policy.	**Agreed**
3.6.2	Methodology	Wiltshire Council is satisfied with the methodology used for **ES Volume 1, Chapter 10: Arboriculture [APP-062].**	The methodology adopted within section 10.6 of **ES Volume 1, Chapter 10: Arboriculture [APP-062]** has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable.	**Agreed**
3.6.3	Baseline	Wiltshire Council is satisfied with the baseline assessment presented in **ES Volume 1, Chapter 10: Arboriculture [APP-062].**	The baseline conditions which are detailed in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, **ES Volume 2, Figure 10-1-1 to 10-1-23: Tree Constraints Plan [APP-133]**, and **ES Volume 3, Appendix 10-2: Tree Survey Schedules [APP-207]** are representative of the baseline site conditions.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.6.4	Assessment Results	Wiltshire Council is satisfied with the assessment results presented in **ES Volume 1, Chapter 10: Arboriculture [APP-062].** However, notes that this will be dependent on detailed design.	The assessment results set out within **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, including likely significant effects anticipated, are acceptable.	**Agreed**
3.6.5	Mitigation	Wiltshire Council is satisfied with the Mitigations presented in sections 10.9 and 10.11 of **ES Volume 1, Chapter 10: Arboriculture [APP-062].** However notes that this will be dependent on detailed design. The Council are content that the AMS is secured through the oCEMP by Schedule 2 Requirement 13 of the DCO.	The proposed mitigation measures set out within sections 10.9 and 10.11 of **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, and secured within the **Arboricultural Impact Assessment and Outline Arboricultural Method Statement [REP7-038]** and the **Outline LEMP [REP7-081]** and **Outline EPMS [REP7-083]** are considered acceptable. **Draft DCO [REP7-007]** Schedule 2 Requirement 13 requires the submission and approval of a Construction Environmental Management Plan (CEMP) by the relevant planning authority prior to the commencement of construction. The approved CEMP must be substantially in accordance with the **Outline CEMP [REP7-073]**.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Table 4 of the **Outline CEMP [REP7-073]** identifies the requirement for an Arboricultural Method Statement (AMS) to be prepared following completion of the detailed design. The Applicant therefore considers that the production, approval and implementation of the AMS is already appropriately secured through Requirement 13 and that no additional standalone Requirement is necessary.	
3.6.6	Arboricultural Method Statement	Wiltshire Council has reviewed the Outline **Arboricultural Method Statement [APP-206].** Wiltshire Council expects that a detailed Arboricultural Method Statement (AMS), based on post-DCO detailed design, will be produced prior to construction commencing and will be included within the detailed CEMP. This must be submitted to the council for its review and approval. The Council require additional information in a Detailed AMS in relation to piling and foundations, and their locations in relation to trees. This	The Applicant will include the aforementioned points in the detailed Arboricultural Method Statement insofar as they relate to works that have the potential to impact retained arboricultural features. The Applicant notes the comment regarding Requirement 13 of Schedule 2 of the **Draft DCO [REP7-007]**. Schedule 2 Requirement 13 requires the submission and approval of a Construction Environmental Management Plan (CEMP) by the relevant planning authority prior to the commencement of construction. The approved CEMP must be substantially	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		should include the Tree Protection Plans and relevant signage. Council requirements as detailed within its Relevant Representation and Local Impact Report should be secured in DCO, if consented, and for the Detailed AMS and AIA to be certified documents under the DCO. Please note issues relating to Arboricultural Method Statement are also covered in subsequent rows below. Following review of the Deadline 7 documents, the council identified inconsistencies between this document and changes that had been made elsewhere to address council concerns. As a result, the Applicant has shared with the council and amended AMS, which will be submitted at Deadline 8, and now includes the ACoW requirement, using the exact same wording as contained within the CEMP, OEMP and LEMP. Provided this is submitted at Deadline 8 as intended, the council has no remaining concerns on the AMS.	in accordance with the **Outline CEMP [REP7-073]**. Table 4 of the **Outline CEMP [REP7-073]** identifies the requirement for an Arboricultural Method Statement (AMS) to be prepared following completion of the detailed design. The Applicant therefore considers that the production, approval and implementation of the AMS is already appropriately secured through Requirement 13 and that no additional standalone Requirement is necessary.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.6.7	Outline Construction Environmental Management Plan (CEMP)	The Council notes that a 242 m section of internal access track is proposed within the 15 m buffer of North Bincombe Wood (ancient woodland), using an existing gravel track. While no tree removal is proposed and retention of the existing subbase is preferred, the Council highlights a risk to woodland edge trees, as hand excavation and root pruning could lead to the loss of fibrous roots. The Council accepts the principle of mitigation measures set out in the Outline CEMP but remains cautious, emphasising that works within buffer zones and RPAs present a risk to tree health. The Council's stance is that strict adherence to BS5837 standards, effective ground protection, and active Arboricultural Clerk of Works supervision will be essential to minimise harm, and that the potential impacts on ancient woodland trees must be carefully managed and justified. The council considers that the AIA and Detailed AMS should be approved	The proposed mitigation measures set out within sections 10.9 and 10.11 of **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, and secured within **ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [REP7-038]** and the **Outline LEMP [REP7-081]** and **Outline EPMS [REP7-083]** are considered acceptable. The alignment of the access track referenced has been amended to avoid using the existing road and a 15m buffer zone has been proposed. Detailed alignment to be provided in future through detailed design. The Applicant does not consider a standalone Requirement to be necessary. The proposed approach secures the preparation and approval of an AMS by the relevant planning authority through Requirement 13 and the **Outline CEMP [REP7-073]**. Whether the AMS is secured as a standalone document or as part of the CEMP approval process does not alter	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		through its own standalone Requirement for Arboriculture rather than subsumed within the CEMP. The Council remains concerned that the repair methodology has not been sufficiently constrained within the track at North Bincombe Wood. The Council would like to see the inclusion of wording within the CEMP and detailed Arboricultural Method Statement confirming that: "*Any repairs to the access track at North Bincombe Wood shall be limited to the infilling of potholes using no-fines gravel and topsoil onlyand shall be undertaken solely for the purposes of ensuring the track is suitable for continued hedgerow / vegetation management*." This restriction would minimise impacts within Root Protection Areas and avoid the gradual intensification or upgrading of the track. Wiltshire Council Arboricultural Officers do not agree with the last part of the proposed changes stating *"and access by the undertaker, its contractors or*	the level of control afforded to Wiltshire Council, and the Applicant therefore considers the current drafting to be appropriate and proportionate. The Applicant acknowledges Wiltshire Council's proposed wording relating to additional restrictions on the use of the existing access track adjacent to North Bincombe Wood. The Applicant considers the following wording to be appropriate and provides suitable control of future movements required for the Scheme "*Any repairs to the existing section of access track adjacent to North Bincombe Wood shall be limited to the infilling of potholes using no-fines gravel and topsoil only. Use of the access track shall be limited to access by existing landowners for the purposes of accessing and managing their land and access required by the undertaker for hedgerow and other vegetation management."*	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		agents where reasonably necessary to undertake activities required to comply with, or discharge, its legal or statutory obligations in connection with the authorised development". The phrase "reasonably necessary" is open to misinterpretation and could allow a wide range of future activities and vehicle movements that are not currently identified, assessed or necessary, introducing uncertainty regarding the nature, frequency and duration of future access requirements and could result in impacts on adjoining ancient woodland over the term of the scheme. The LPA would like to remind the Applicant of their commitment to change the wording specified in the applicant's response by removing "and access by the undertaker, its contractors or agents where reasonably necessary to undertake activities required to comply with, or discharge, its legal or statutory obligations in connection with the authorised development."		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The council is satisfied with the wording now contained within the CEMP, however it is acknowledged that the Tree Impact Plans still illustrate the track alongside North Bincombe wood.		
3.6.8	Outline CTMP	The Council considers that details in relation to laydown and accommodation areas should be included within the Detailed AMS so that the impact on trees and hedgerows can be fully assessed and considered. The council originally considered that the AIA and Detailed AMS should be approved through its own standalone Requirement for Arboriculture rather than subsumed within the CTMP. Information should be collated in one place for approval rather than spread across multiple documents. However, it was subsequently accepted that during construction, the AIA / AMS would be certified under the CEMP. Wiltshire Council requested that there is a 10 metre buffer from the boundary	In Section 2.9 of the **Outline CEMP [REP7-073]** it sets out *'The location and size of parking provisions on-site, loading and unloading areas for plant and materials, storage areas, wheel washing facilities and construction traffic management measures will be set out in the CTMP, which will also include a description of any laydown areas or accommodation areas.*' The Applicant does not consider a standalone Requirement to be necessary. The proposed approach secures the preparation and approval of an AMS by the relevant planning authority through Requirement 13 and the **Outline CEMP [REP7-073]**. Whether the AMS is secured as a standalone document or as part of the CEMP approval process does not alter the level of control afforded to Wiltshire	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		of the temporary construction compounds to any Category A, Category B, Veteran or Ancient tree. The council welcomes the Applicant's agreement to this.	Council, and the Applicant therefore considers the current drafting to be appropriate and proportionate. Temporary construction compounds will be located outside the RPAs of retained trees, regardless of quality category.	
3.6.9	Battery Energy Storage System	Further information is required to ensure the detailed AMS will inform site operatives with regard to how the foundations of the BESS will be constructed in close proximity to trees. Council originally considered that approval of the Detailed AMS and Tree Protection Plans are required under its own Arboriculture Requirement within the DCO. Documents to be certified under DCO. However, it was subsequently accepted that during construction, the AIA / AMS would be certified under the CEMP.	The detailed Arboricultural Method Statement will set out the construction methodology where works are to be undertaken in proximity to trees. At the pre-construction stage, an Arboricultural Clerk of Works will be appointed to define and oversee the implementation of tree protection measures. The location of trees is presented in **ES Volume 2, Figure 10-2-4: Tree Impact Plan [APP-134]** and the BESS is located sufficiently distant from them so that they will not be impacted. Protection measures for these trees will be installed if deemed necessary by the Arboricultural Clerk of Works at the pre-construction stage.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			The Applicant does not consider a standalone Requirement to be necessary. The proposed approach secures the preparation and approval of an AMS by the relevant planning authority through Requirement 13 and the **Outline CEMP [REP7-073].** Whether the AMS is secured as a standalone document or as part of the CEMP approval process does not alter the level of control afforded to Wiltshire Council, and the Applicant therefore considers the current drafting to be appropriate and proportionate.	
3.6.10	Cable Route Corridor - temporary construction compound areas	In relation to the 15m buffer of Surrendell Wood, Wiltshire Council was concerned that the information did not clearly demonstrate how impacts on trees and ancient woodland will be avoided or adequately managed including: • Uncertainty over compound construction methods. • Inconsistencies in submitted plans, as only six compounds can be	Construction-phase tree protection and management measures are set out in the **Outline CEMP [REP7-073]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft DCO [REP7-007]**, ensuring ancient and veteran trees are protected throughout the lifetime of the Scheme. A detailed CEMP will be produced, a requirement	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		identified on the Tree Impact Plans, despite seven being described. • Potential encroachment into tree canopies and Root Protection Areas (RPAs), which conflicts with the Outline CEMP's statement that compounds will be sited outside these areas. • Indicated 'possible tree impacts' on at least one Tree Impact Plan, suggesting a risk to adjacent trees and woodland. • Council approval of the Detailed AMS and Tree Protection Plans are required under its own Arboriculture Requirement within the DCO. The Council identified requirements as detailed within its Relevant Representation and Local Impact Report to be secured in DCO, if consented, and for the Detailed AMS and AIA to be certified documents under the DCO. However, it was subsequently accepted that during construction, the AIA / AMS would be certified under the CEMP.	of which is to also produce an AMS. Both the CEMP and AMS will require sign off from Wiltshire Council. As stated in the **Outline CEMP [REP7-073]**, Temporary Construction Compounds will be located outside the canopy spread and Root Protection Areas (RPAs) of adjacent trees and woodland. As stated in Paragraph 2.1.20 of the Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206] '*The positions of all trees, groups of trees and woodlands plotted in the Cable Route Corridor survey were estimated from aerial imagery with the assistance of GPS hardware only and not based on a topographical survey*.' The track adjacent to Surrendell Wood has been subject to historical heavy agricultural machinery use and ground conditions along the track are expected to be compacted as a result. This compaction and the localised variances in ground levels between woodland trees, the existing access surface and	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council's Arboricultural Officers considered that the continued use of the existing track in its current alignment was preferable and less environmentally intrusive than the creation of a new access route within or adjacent to the ancient woodland buffer. The construction of a new track would result in additional disturbance to soils, roots, ground flora and the wider woodland edge environment, whereas the use of an established route avoids the need for further land take and excavation. Whilst the Council accepts the principle of using the existing track, it had the following concerns: • The potential for construction traffic to deviate from the existing track and encroach into adjacent woodland habitat. • Localised degradation of the track surface that could lead to rutting, soil compaction or indirect impacts on retained trees and woodland edge habitats.	the outer limits of the proposed temporary construction compound make for unfavourable growing conditions and the potential for root ingress to the full extents of the 15m buffer Zone is considered low. Any impacts to Surrendell Wood as a result of the construction of the Temporary Construction Compound are considered to be neutral, taking into account that construction of the Temporary Construction Compound will be outside the canopy spread and RPAs of retained trees and be sited in accordance with the commitments set out in the **Outline CEMP [REP7-073]**. The Applicant does not consider a standalone Requirement to be necessary. The proposed approach secures the preparation and approval of an AMS by the relevant planning authority through Requirement 13 and the Outline CEMP. Whether the AMS is secured as a standalone document or as part of the CEMP approval process does not alter the level of control afforded to Wiltshire Council, and the Applicant therefore considers the	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• Any excavation, widening, resurfacing or other ground disturbance within the 15m buffer which could adversely affect soils and tree rooting environments associated with the ancient woodland. The Council's Arboricultural Officers agreed that use of the existing track is less intrusive than the creation of a new access route. Provided the track remains within its existing footprint and is used appropriately, this approach minimises disturbance to the ancient woodland and avoids unnecessary impacts associated with new construction works. The Council considered the following mitigation, monitoring and controls measures necessary: • Protective fencing should be installed where appropriate along the woodland edge to prevent vehicle egress from the existing track, in accordance with the principles of BS 5837:2012 Trees in	current drafting to be appropriate and proportionate. The Applicant considers that appropriate mitigation and monitoring are already secured through the **Arboricultural Method Statement [REP7-038]** and the **Outline CEMP [REP7-073]**, which together provide suitable protection for Surrendell Wood during construction. The Applicant will incorporate into the AMS that protective fencing will be installed where appropriate along the woodland edge to prevent vehicle egress from the existing track, in accordance with the principles of BS 5837:2012 Trees in Relation to Design, Demolition and Construction, and notes that the ACoW is also required to confirm the fencing location and suitability before works start. Similarly the Applicant will commit to implementation of suitable ground protection, the ACoW will monitor and record any activities occurring within a buffer where not already addressed through the CEMP and AMS, and	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Relation to Design, Demolition and Construction. • Suitable ground protection measures should be used in locations where the existing track demonstrates insufficient stability for the size and weight of construction vehicles. • No excavation, track widening or other ground disturbance should take place within any part of the track located inside the 15m ancient woodland buffer. • Any works or activities within the buffer that are not already addressed through the Construction Environmental Management Plan (CEMP) and Arboricultural Method Statement (AMS) should be monitored and recorded by the Arboricultural Clerk of Works (ACoW). • The Local Planning Authority should be informed of any incidents, departures from the approved AMS, or evidence of adverse effects on	agrees that the Local Planning Authority should be informed of any material incident or material departure from the approved AMS, or any evidence identified by the ACoW of adverse effects on the ancient woodland attributable to the construction works The Applicant does not accept that no excavation, track widening or other ground disturbance should take place within any part of the track located inside the 15m ancient woodland buffer. This is due to the track being located within the 15m buffer and it is anticipated that additional strengthening would be required for the track for the use of construction vehicles. Further to the above, the Applicant has updated **Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [REP7-038]** to include the following requirement in relation to the existing access track adjacent to Surrendell Wood:	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the ancient woodland so that appropriate remedial measures can be considered and implemented. Subject to the above mitigation, monitoring and control measures, Wiltshire Council's Arboricultural Officers do not object to the use of the existing access track and consider it to represent the least environmentally intrusive option. Wiltshire Council Arboricultural Officers agree that only the wording *"•No excavation, track widening or other ground disturbance should take place within any part of the track located inside the 15m ancient woodland buffer."* shouldl be removed, but that new wording would be added to account for any deviation from the AMS and CTMP that shall be recorded and reported to the LPA by the ACoW, in the interests of protecting and monitoring the long-term retention of the ancient woodland. The council is satisfied that these changes have been made.	*Protective fencing will be installed, where appropriate, along the woodland-facing edge of the existing access track adjacent to Surrendell Wood. The fencing will be positioned at the edge of the track, rather than at the woodland edge, to prevent vehicle, plant or materials entering the intervening area between the track and the woodland, including land within the 15 m woodland buffer.* *Where required, temporary ground protection appropriate to the anticipated vehicle loading will be installed over the existing track before it is used by construction vehicles or plant. Any widening of the track within the 15 m woodland buffer will incorporate an appropriate cellular confinement system and/or temporary ground-protection system, designed to accommodate the anticipated vehicle loading and avoid unacceptable soil compaction or root damage. The extent and specification of these measures will be determined by the A CoW and shown on the relevant Tree Protection Plan. The measures will be installed*	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			before the track is brought into use and maintained for the duration of its use. The proposed cellular confinement system and/or temporary ground protection system will be explained within the Detailed AMS.	
3.6.11	Schedule 13 of the draft DCO	The Arboricultural Impact Assessment (AIA) and Arboricultural Method Statement (AMS) should be included in Schedule 13 of the draft Development Consent Order (DCO) so they are formally identified and certified by the Secretary of State as the approved versions of those documents. They become the definitive documents against which the authorised development must be carried out. Wiltshire Council still require that the Arboricultural Impact Assessment (AIA) and Arboricultural Method Statement (AMS) should be included in Schedule 13 of the draft Development Consent Order (DCO) so they are formally identified and certified by the Secretary of State as the approved versions of those documents to provide a robust	The Applicant does not consider a standalone Requirement to be necessary. The AIA is an appendix to the Environmental Statement which itself is a certified document within Schedule 13 of the DCO. The proposed approach secures the preparation and approval of an AMS by the relevant planning authority through Requirement 13 and the **Outline CEMP [REP7-073]**. Whether the AMS is secured as a standalone document or as part of the CEMP approval process does not alter the level of control afforded to Wiltshire Council, and the Applicant therefore considers the current drafting to be appropriate and proportionate.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		schedule over the period of the scheme. Wiltshire Council have accepted that the AIA and AMS will be secured through the CEMP in Schedule 13.		
3.6.12	Outline Operational Environmental Management Plan (OEMP)	It is stated that: "*Should the existing track adjacent to Bincombe Wood be used during the operational stage, any upgrade to the 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 subbase. Detailed design of the access track will take place post-DCO and will include consideration of cellular confinement systems with high load bearing capacities.*" The track to the north of Bincombe Wood forms part of the 15-metre buffer zone within the Ordre Limits and is therefore considered an exclusion zone. As such, it should not be	The Applicant notes this comment. The existing track adjacent to Bincombe Wood is currently in a poor state of repair, with existing defects and surface degradation arising from its ongoing use by landowners and agricultural tenants. As such, it is anticipated that some form of repair or upgrade may be required to facilitate its continued use, irrespective of the Scheme. Any such works associated with the Scheme would be undertaken using a suitable no-dig construction methodology designed to avoid excavation, minimise ground disturbance and prevent impacts to adjacent trees, roots and ancient woodland buffers. During the operational phase, use of the track by the Applicant would be limited to occasional maintenance and	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		accessed or used by the Applicant for any purpose associated with the proposed development. The track should not provide any form of construction, operational, or maintenance access to the PV sites. Its use should remain restricted to landowners and farmers who currently utilise the track. Furthermore, hedgerow management adjacent to the track should continue in accordance with existing management practices that have been undertaken in previous years, ensuring the continued maintenance of the hedgerow and its associated ecological and landscape value. The Council continues to seek clarification and certainty regarding the future use of the access track at North Bincombe Wood. The Council wanted to see the inclusion of wording confirming that: "*The access track at North Bincombe Wood shall be used solely for monitoring and maintenance activities associated with the adjacent hedgerow*	inspection activities, undertaken using light vehicles where appropriate. The frequency and nature of such access would be low and consistent with the operational requirements of the Scheme. Existing landowner and agricultural access arrangements would be retained, and any adjacent hedgerow management would continue in accordance with established management practices and relevant environmental commitments secured through the DCO. The Applicant proposes the following wording and feels this provides suitable control for the development of the Scheme "" *Any repairs to the existing section of access track adjacent to North Bincombe Wood shall be limited to the infilling of potholes using no-fines gravel and topsoil only. Use of the access track shall be limited to access by existing landowners for the purposes of accessing and managing their land and access required by the undertaker for hedgerow and other vegetation management*.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		/ vegetation and for no other operational or maintenance purpose." This would provide certainty regarding the scope of future usage and minimise the risk of incremental impacts on adjacent woodland, trees and habitats. Wiltshire Council Arboricultural Officers do not agree with the last part of the proposed changes stating *"and access by the undertaker, its contractors or agents where reasonably necessary to undertake activities required to comply with, or discharge, its legal or statutory obligations in connection with the authorised development"*. The phrase "reasonably necessary" is open to misinterpretation and could allow a wide range of future activities and vehicle movements that are not currently identified, assessed or necessary, introducing uncertainty regarding the nature, frequency and duration of future access requirements and could result in impacts on adjoining ancient woodland over the term of the scheme.		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The council is satisfied with the wording now contained within the OEMP.		
3.6.13	Article 41 of the draft DCO	Whilst Article 41 of the draft Development Consent Order (DCO) removes the requirement to obtain consent for works to protected trees, the Local Planning Authority considered that any works affecting trees protected by a Tree Preservation Order (TPO) within the Order Limits should nevertheless be subject to approval by the Local Planning Authority. This would enable the continued involvement of the Authority's tree specialists in reviewing proposed works and determining their appropriateness in relation to protected trees. Furthermore, the Local Planning Authority considered that it should retain the ability to make new Tree Preservation Orders within the Order Limits throughout the 60-year operational life of the development. Any trees protected by such future	The Applicant does not agree that separate approval under the TPO regime is necessary. Article 41 provides a deemed consent for works to protected trees where the undertaker reasonably believes such works are necessary for the construction, operation, maintenance or decommissioning of the authorised development. This is a well-established approach within DCOs and avoids duplication of separate consenting regimes following the grant of development consent. It also reflects the Applicant's existing powers under the Electricity Act 1984, being a statutory undertaker by virtue of its generating licence. The impacts on protected trees have been assessed as part of the ES and appropriate mitigation is secured through the **Draft DCO [REP7-007]**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Orders should remain subject to the relevant TPO controls, with the applicant required to seek approval from the Local Planning Authority before undertaking any works to those trees. Wiltshire Council Arboricultural Officers are satisfied that the proposed five working day notice period set out in paragraph 4(b) is reasonable in relation to trees protected by Tree Preservation Orders. However, the Council would recommend that the provision is extended to include trees within Conservation Areas that are subject to the notification requirements of Section 211 of the Town and Country Planning Act 1990. This would ensure that trees contributing to the character and appearance of Conservation Areas are afforded equivalent consideration and protection. In respect of works that are urgently required for safety reasons, the Council acknowledged that such works may need to be undertaken within the five	and the **Outline CEMP [REP7-073]**, including the requirement for an Arboricultural Method Statement to be prepared based on the detailed design and approved by the relevant planning authority where required under the DCO Requirements. Article 41 does not prevent the Local Planning Authority from making Tree Preservation Orders in the future. Rather, it provides that where works to trees subject to existing or future TPOs are reasonably necessary for the authorised development, those works benefit from deemed consent under the DCO. Requiring separate TPO consent would duplicate controls already established through the DCO and could impede the implementation and operation of the authorised development notwithstanding the grant of development consent. The Applicant has included additional drafting in Article 41 requiring that notice of works to TPO must be	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		working day notice period where there is an immediate risk of serious harm. In these circumstances, the responsibility should remain with the applicant to provide sufficient evidence demonstrating the condition of the tree and justifying why it was expedient and necessary to undertake the works without prior notice. Subject to the above recommendation regarding Conservation Area trees, the Council has no objection to the proposed notice provisions within Article 41. Wiltshire Council remind the Applicant of their commitment regarding the proposed notification provisions within Article 41 including the recommendation that the five working day notification requirement should also apply to trees within Conservation Areas that are subject to the notification requirements of Section 211 of the Town and Country Planning Act 1990.	provided to the relevant planning authority, in recognition of the Council's concerns. The Applicant acknowledges Wiltshire Council's comments regarding the proposed notification provisions within Article 41, including the recommendation that the five working day notification requirement should also apply to trees within Conservation Areas that are subject to the notification requirements of Section 211 of the Town and Country Planning Act 1990. The Applicant has incorporated following wording into the **Outline OEMP [REP7-075]**: *Where, during operation of the authorised development, the Undertaker determines that the felling or removal of a retained tree classified as Category A or Category B in accordance with BS 5837:2012, or a retained veteran or ancient tree, is reasonably necessary due to disease, structural condition, safety*	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Undertaker has a duty to replant in, or as practicably near to, the same location as the tree that has been removed. To allow Wiltshire Council to keep UpToDate records of works to existing trees, and the planting of new trees, the specifics of reporting shall include: • Tree number. • Works carried out. • Date carried out. • Species and location of replacement planting where felling has occurred. Wiltshire Council agree to the terms set out above relating to being able to make representations regarding the removal of trees under a 5 Day Notice, Furthermore, all trees within the order limits that are category A and B will be included within the above, regardless of whether they are located within a Conservation Area or not.	*considerations or operational requirements associated with the authorised development, the Undertaker shall provide Wiltshire Council with not less than five working days' written notice prior to undertaking such works.* *Where works are urgently necessary because a tree presents an immediate risk of serious harm to persons or property, the requirement to provide prior notification shall not apply. In such circumstances, Wiltshire Council shall be notified in writing as soon as reasonably practicable following completion of the works* *"Wiltshire Council may make representations to the undertaker during that five-working-day period. The undertaker shall have regard to any representations received before undertaking the works".* *Further to the above Articles 40 and 41 have been updated to include the following wording:" The powers*	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			conferred by this article must be exercised in accordance with the relevant environmental management plan approved under Schedule 2, having regard to the phase of the authorised development during which the works are undertaken."	
3.6.14	Article 40 - Schedule 12, Parts 1 and 2 of the draft DCO	The Council consider that hedgerow removal has been suitably considered in the Outline EPMS and that the maximum extents shown on the Hedgerow Removal Plan represent the worst-case extent of removal. Following the review of Deadline 7 material, Wiltshire Council identified the need for SH141 to be removed from Part 2 of Schedule 12 relating to the removal of hedgerows to the track north of North Bincombe Wood. The Applicant has evidenced that this change will be made and submitted at Deadline 8. Therefore, provided that this is contained within he submitted material, the council is satisfied.	The Hedgerow Removal Plan within Annex A of the **Outline EPMS [REP7-083]** has been updated to identify the minimum and maximum extents of hedgerow removal at each location. A range of hedgerow removal minimum and maximum extents have been identified within the Hedgerow Removal Plan corresponding to different elements of the Scheme. The minimum extent represents the Applicant's minimum expectation of the hedgerow removal required to construct the different elements of the Scheme based on the current design. The maximum extent identifies the worst-case extent of removal that may be required and has been included to retain an appropriate degree of	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			flexibility during the detailed design stage. Additional text has been included within Method Statement 5 of the **Outline EPMS [REP7-083]** at Deadline 5 to clarify that, prior to any hedgerow removal works, the extent of removal at each location will be determined through detailed design and construction planning, with the use of existing gaps in hedgerows prioritised wherever practicable to minimise the need for removal. The method statement also confirms that the maximum extents shown on the Hedgerow Removal Plan represent an upper limit and will not automatically be removed.	
3.6.15	OOEMP, OCEMP	The Council remained concerned that the management plans and strategies did not provide sufficient detail regarding the monitoring, recording and reporting of impacts arising from the operation of the development upon retained trees, particularly Category A,	The Applicant maintains that appropriate measures are already secured through the Development Consent Order and the certified management plans. During operation, the Applicant will continue to fulfil its duty of care as landowner and operator	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Category B, Veteran and Ancient Trees. The development is proposed to operate for approximately 60 years and there remains potential for direct and indirect impacts to trees through changing site conditions, maintenance activities, access requirements, soil disturbance and cumulative operational effects. A formal monitoring, recording, and reporting mechanism is necessary to identify emerging impacts at an early stage and ensure appropriate intervention where adverse effects occur. The Council sought inclusion of a requirement that: • All trees, but particularly Category A, Category B, Veteran and Ancient Trees within, adjacent to, or potentially affected by the Order Limits are subject to periodic monitoring throughout the operational life of the development.	by undertaking appropriate inspection and management of trees where necessary to ensure their continued safety. However, the Applicant is of the view that a requirement to formally document and report routine monitoring findings to the Local Planning Authority throughout the operational life of the development would not be proportionate, particularly given the nature of the Proposed Development and the controls already secured. The Applicant proposes to add the following text to the oLEMP: *Where a retained tree identified within the Arboricultural Impact Assessment as a BS 5837:2012 Category A or Category B tree, or as a veteran or ancient tree, is felled or removed during operation of the Scheme, replacement planting will be undertaken where reasonably practicable and appropriate having regard to the reason for removal, the*	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• Monitoring findings are documented and reported to the LPA. • Monitoring identifies any deterioration attributable to the development and recommends appropriate corrective measures. • Reports are submitted at agreed intervals and maintained as part of the operational environmental management record. The loss of higher-value trees represents a significant environmental effect. Appropriate compensation can only be secured where sufficient detail and oversight are provided to ensure that replacement planting delivers meaningful landscape, ecological and arboricultural benefits. The Council remained concerned that sufficient control had not yet been secured regarding the details of mitigation and compensatory planting associated with the removal of Category A, Category B, Veteran and Ancient Trees.	*location of the tree and relevant arboricultural and ecological considerations.* *Replacement planting will comprise an appropriate native species of a size and specification suitable for the location and will normally be undertaken during the first appropriate planting season following removal. Replacement planting will be located at or in reasonable proximity to the location of the removed tree where practicable, or elsewhere within the relevant Solar PV Site where this would provide greater landscape, ecological or arboricultural benefit.* *Replacement trees will be subject to appropriate establishment and maintenance measures in accordance with the final LEMP.* In addition to the above updates the following text has been added to the **Outline OEMP [REP7-075]**: "*Where replacement planting is undertaken to mitigate the operational*	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council sought provisions requiring LPA approval of: • Tree species selection. • Planting sizes and specifications. • Planting locations. • Quantities and replacement ratios. • Establishment and maintenance regimes. Wiltshire Council are willing to remove the wording: "The Council seeks provisions requiring LPA approval of: • Tree species selection. • Planting sizes and specifications. • Planting locations. • Quantities and replacement ratios. • Establishment and maintenance regimes.", However, it was noted that there was no mechanism for any recording or	*loss of a retained BS 5837:2012 Category A or Category B tree, Wiltshire Council will be notified of the proposed species, size, specification and location of the replacement planting before the planting is undertaken.*"	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		reporting to the LPA identified in the Applicant's response regarding new planting. It should be clear that the LPA requires certain information to ensure appropriate trees are planted in appropriate locations for long-term retention, whilst also being able to update relevant Orders. There was no clear method provided to demonstrate that this will be incorporated within the oOEMP and oLEMP. Wiltshire Council Arboricultural Officers accept that the Applicant has reconsidered the wording and is satisfied that it is appropriate to ensure that the LPA are informed of mitigated planting.		
3.6.16	ES Chapter 10 Arboriculture – Tree Survey	The Council questioned the categorisation of a number of trees identified within the Order Limits identified as A1 which appear to have been downgraded from Veteran. The Council acknowledged that there is no single mandatory criterion for Veteran Tree classification and veteran	The Applicant does not agree that any trees have been downgraded from Veteran to Category A1. The arboricultural baseline information used to inform the Arboricultural Impact Assessment has been prepared in accordance with recognised industry guidance and standards, including BS	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		status is determined through the presence of recognised veteran characteristics and habitat features. The characteristics described within the survey documentation, including age-related features, structural adaptation, deadwood habitat, cavities and veteran form, are commonly associated with Veteran trees, therefore Wiltshire Council requested that, until sufficient evidence is provided to say otherwise, a precautionary approach should be adopted and Category A1 trees treated as Veteran trees for impact assessment and mitigation purposes. Wiltshire Council reminded the Applicant of their commitment to adopt a precautionary approach for all A Category trees within the Order Limits to be treated as Veteran trees, and wished to see wording to this effect within the Arboricultural Impact Plans and AMS. Wiltshire Council are satisfied that the Applicant acknowledges their	5837:2012 and relevant veteran tree guidance. Whilst some trees may exhibit individual characteristics that can be associated with veteran trees, the presence of isolated veteran characteristics does not, in itself, justify classification as a Veteran tree. Where the evidence is insufficient to support classification as a Veteran tree, the tree has been categorised in accordance with the criteria set out in BS 5837:2012. The Applicant therefore considers the tree categorisations presented within the application to be robust and appropriate for the purposes of the assessment. Notwithstanding this, in the interest of progressing this matter, the Applicant has agreed to apply the same RPA buffers to A1 trees as though they were veterans, while affording them the mitigation that would be provided to veteran trees.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		commitment to *"manage all A Category trees within the Order Limits with the same consideration as Veteran trees"* and that the wording to this effect is within the Arboricultural Impact Plans and AMS.		
3.6.17	OCTMP Revision 4 [REP4-057]	The Council continues to seek clarification and certainty regarding the future use of the access track at North Bincombe Wood. The Council would like to see the inclusion of wording confirming that: "*The access track at North Bincombe Wood shall be used solely for monitoring and maintenance activities associated with the adjacent hedgerow / maintenance and for no other operational or maintenance purpose."* This would provide certainty regarding the scope of future usage and minimise the risk of incremental impacts on adjacent woodland, trees and habitats. Wiltshire Council Arboricultural Officers do not agree with the last part of the	The Applicant acknowledges Wiltshire Council's proposed wording relating to additional restrictions on the use of the existing access track adjacent to North Bincombe Wood. The Applicant considers the following wording to be appropriate and provides suitable control of future movements required for the Scheme "*Any repairs to the existing section of access track adjacent to North Bincombe Wood shall be limited to the infilling of potholes using no-fines gravel and topsoil only. Use of the access track shall be limited to access by existing landowners for the purposes of accessing and managing their land; access required by the undertaker for*	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		proposed changes stating *"and access by the undertaker, its contractors or agents where reasonably necessary to undertake activities required to comply with, or discharge, its legal or statutory obligations in connection with the authorised development".* The phrase "reasonably necessary" is open to misinterpretation and could allow a wide range of future activities and vehicle movements that are not currently identified, assessed or necessary, introducing uncertainty regarding the nature, frequency and duration of future access requirements and could result in impacts on adjoining ancient woodland over the term of the scheme. The LPA would like to remind the Applicant of their commitment to change the wording specified in the applicant's response by removing "and access by the undertaker, its contractors or agents where reasonably necessary to undertake activities required to comply with, or	*hedgerow and other vegetation management."*	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		discharge, its legal or statutory obligations in connection with the authorised development." The council is satisfied with the wording now contained within the CTMP, however the corresponding plans still illustrate the track alongside North Bincombe wood. Should the scheme be consented, this will be subject to the approval of the LPA at requirement discharge stage.		
3.6.18	OLEMP	The Council considers that greater certainty is required regarding professional competence of the Arboricultural Clerk of Works. Given the sensitivity of the affected tree resource, assurance is required that suitably qualified and experienced personnel oversee works with potential arboricultural implications. The Council seek a commitment that the following information is submitted to and approved by the LPA prior to commencement of relevant works:	The Applicant confirms that the appointed ACoW will be a suitably qualified and experienced arboricultural professional with the necessary competence to undertake the role, including appropriate experience of supervising works in the vicinity of retained trees where required. The Applicant considers that this provides an appropriate level of assurance regarding professional competence. However, the Applicant does not consider it proportionate or necessary for the Local Planning Authority to	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• The name of the appointed ACoW. • Relevant qualifications. • Professional memberships. • Demonstrable experience of working with veteran and ancient trees Wiltshire Council would like the wording presented by the Applicant in Revision 4 of the SoCG, regarding the experience and competency of the ACoW, identified within the oLEMP. The LPA would like to remind the Applicant of their commitment to include appropriate wording to the Outline OEMP and Outline LEMP, confirming that the ACoW will be a suitably qualified and experienced arboriculturist with at least five years' relevant professional experience and appropriate knowledge of BS 5837, tree-protection measures and works within or adjacent to Root Protection Areas.	approve the appointment of the Applicant's contractor or specialist personnel, including the ACoW, as this relates to the Applicant's choice of suitably competent contractor rather than the adequacy of the mitigation secured through the Development Consent Order. The Applicant has added the following text to the **Outline AMS [REP7-056]**, **Outline CEMP [REP7-073]** and **Outline OEMP [REP7-075]**. *The Arboricultural Clerk of Works (ACoW) shall be a suitably qualified and experienced arboriculturist with a minimum of five years' relevant professional experience. The ACoW shall have appropriate knowledge and practical experience of arboricultural matters relating to construction, including the application of BS 5837:2012 (or any relevant successor standard), tree protection measures and the supervision of works within or adjacent to Root Protection Areas.*	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The council is satisfied that the documents submitted at Deadline 7 contains the agreed wording.	*The ACoW shall have sufficient experience and competence to undertake the duties identified within this AMS and to provide appropriate arboricultural advice to the construction team throughout the works*.	
3.6.19	Articles 40 and 41 of the dDCO, and Part 3 of Schedule 12	A cross-reference within Articles 40 and 41 will be added to ensure that the powers relating to hedgerows and trees are exercised consistently with the environmental management plans. The following wording is included in both articles: "*The powers conferred by this article must be exercised in accordance with the relevant environmental management plan approved under Schedule 2, having regard to the phase of the authorised development during which the works are undertaken*."	Articles 40 and 41 have been updated to include the following wording: *The powers conferred by this article must be exercised in accordance with the relevant environmental management plan approved under Schedule 2, having regard to the phase of the authorised development during which the works are undertaken*. Part 3 of Schedule 12 of the **Draft DCO [REP7-007]** has been updated to include N/TPO7.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		TPO07 shall be added to Part 3 of Schedule 12 of the dDCO to provide consistency with N/TPO08.		
3.6.20	oOEMP	At the moment there isn't an explicit requirement within the Outline OEMP to re-survey the areas that would potentially be affected by the panel replacement programme (acknowledging that the arboricultural baseline adjacent to access routes may change over the lifetime of the Scheme). The LPA requests that the following wording be added to the Outline OEMP: "*Prior to any planned replacement of all or a substantial proportion of the Solar PV Panels:* • *A tree survey would be undertaken in accordance with BS 5837:2012 (or in line with most recent adopted standard and industry guidelines)*	The Applicant has updated the **Outline OEMP [REP7-075]** to include the following requirement: *Prior to any planned replacement of all or a substantial proportion of the Solar PV Panels:* • *A tree survey would be undertaken in accordance with BS 5837:2012 (or in line with most recent adopted standard and industry guidelines)* • *An Arboricultural Impact Assessment would be produced alongside an Arboricultural Method Statement*	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• *An Arboricultural Impact Assessment would be produced alongside an Arboricultural Method Statement."* The LPA are satisfied that the wording within Table 4 of 3.5 Arboriculture in the oOEMP appropriately considers the arboricultural needs during planned replacement of solar panels.		
3.6.21	oDS, and any other management plans that contain wording specific to the use of North Bincombe Wood	The LPA would like to remind the Applicant of their commitment to change the wording specified in the applicant's response by removing "*and access by the undertaker, its contractors or agents where reasonably necessary to undertake activities required to comply with, or discharge, its legal or statutory obligations in connection with the authorised development*." The LPA acknowledges the changes made by the Applicant to the wording within the relevant management plans that refer to the use of North Bincombe Wood, however corresponding plans	The Applicant has updated the text within the **Outline DS [REP7-077]** regarding the use of the existing track adjacent to North Bincombe Wood to state: *Any repairs to the existing section of access track adjacent to North Bincombe Wood shall be limited to the infilling of potholes using no-fines gravel and topsoil only. Use of the access track shall be limited to access by existing landowners for the purposes of accessing and managing their land and access required by the*	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		still identify the access track and access locations.	*undertaker for hedgerow and other vegetation management.*	
3.6.22	All plans associated with access locations 14 and 15, the access track north of North Bincombe Wood, and the removal of hedgerows HR055 and HR165, also referenced as SH141 and SH148 respectively	Following the review of Deadline 7 material, Wiltshire Council Arboricultural Officers accept that the wording within some of the Management Plans have been changed to reflect the revised use of the track to North Bincombe Wood, however these changes have not been incorporated into the actual plans associated with the Management Plans. As a result, the Applicant will be submitted a revised Access Plan and Outline Ecological Protection and Mitigation Strategy at Deadline 8, which removes this inconsistency. The council has had sight of their proposed submission, and provided that this is submitted into examination, the council's concerns will now have been addressed. Furthermore, the council identified a discrepancy with the inclusion of	The Applicant has updated the text and the drawings within **Appendix 13-1 Transport Assessment [REP7-058 to REP7-061]** (updated at D7 to remove access point 14 and 15), the **Outline EPMS [EN010168/APP/7.19]** Annex A Hedgerow Removal Plan, sheet 19 (submitted at D8) and Schedule 7 and Schedule 12 of the **Draft DCO [EN010168/EXAM/9.16]** (submitted at D8) The **Arboricultural Impact Assessment Method Statement [EN010168/APP/6.3]** has been updated (submitted at D8) and the **Outline OEMP [REP7-075] (Revision 8)** was updated and submitted at D7.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		access points within Part 1 of Schedule 7 of the dDCO, which continued to include the access points at Rodbourne, along Cabbage Lane. As a result, in the dDCO to be submitted at Deadline 8 the Applicant will be removing the rows relating to: • Access point 14 on page 6 of the access plan; and • Access point 15 on page 6 of the access plan Provided the above referenced changes are submitted into examination at Deadline 8, the council's concerns in this regard will have been resolved.		

3.7 Hydrology, Flood Risk and Drainage

Table 3-7: Hydrology, Flood Risk and Drainage

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.7.1	Legislation and Policy	Wiltshire Council acknowledges that the Applicant has identified and applied the relevant national and local planning policy and legislative framework, including the NPPF, Wiltshire Local Plan Policies 95 and 96, the Wiltshire Strategic Flood Risk Assessment and relevant LLFA guidance. The Council is satisfied that the applicable legislation, policy and guidance have been identified and appropriately considered within ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and the Flood Risk Assessment and Drainage Strategy documents [REP4-021 to REP4-036 and REP3-063] Remaining matters relating to hydrological performance monitoring, verification, governance, performance review and adaptive management are addressed separately under references 3.7.20 to 3.7.25, including the management framework established	The Applicant confirms that the relevant legislative and policy framework has been identified and applied within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP7-042 to REP7-055 and REP3-063]**. The matters raised by Wiltshire Council regarding the securing, implementation, monitoring, maintenance and governance of mitigation are substantively addressed at 3.7.20 (Interrelationship Between Documents) and 3.7.25 (Monitoring, Governance and Performance Triggers) and are not repeated here. The **Mitigation Route Map [REP7-109]**, in particular Table 3-5: Hydrology, Flood Risk and Drainage, provides the consolidated audit trail identifying the mitigation relied upon,	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		through the Outline Operational Environmental Management Plan (Rev 5) [REP7-075], Outline Soil Resources Management Plan (Rev 4) [REP5-077], Outline Landscape and Ecological Management Plan (Rev 3) [REP5-079] and Mitigation Route Map [REP7-109].	associated monitoring requirements and the mechanism by which each measure is secured.	
3.7.2	Sequential Test	Wiltshire Council confirm the sequential and exception tests appear to have been applied correctly, with solar PV panels and substations located in Flood Zone 1, wherever feasible.	The Applicant welcomes Wiltshire Council's acknowledgement that the Sequential and Exception Tests appear to have been applied correctly. The Sequential and Exception Tests are set out in the **Planning Statement [REP7-064]** and **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP7-040]**. Following ISH5, the **Design Principles and Parameters [REP7-066]** have been updated to expressly require the BESS and substations to be located within Flood Zone 1, securing this sequential approach through detailed design.	**Agreed**
3.7.3	Climate Change	Wiltshire Council confirm compliance with climate change allowances (+71%	The Applicant confirms that the assessment applies the Environment	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		flow uplift for 2080s) is demonstrated using Manning's calculations and NaFRA2 mapping.	Agency upper end climate change allowances, including +71% flow uplift for the 2080s epoch where relevant, as set out within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and the site-specific FRA appendices. The approach accords with national guidance.	
3.7.4	SuDS and SFRA Linkage	Wiltshire Council accepts that the Scheme relies upon a combination of formal drainage infrastructure and non-structural SuDS measures. The Council acknowledges that the Applicant has strengthened the linkage between the Flood Risk Assessment, Drainage Strategy, Wiltshire Strategic Flood Risk Assessment and relevant SuDS guidance through updates to ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and the Flood Risk Assessment and Drainage Strategy Covering Report [REP4-021]. The Council also acknowledges that the Applicant has identified the runoff-management measures relied upon by the Scheme,	The Applicant agrees that clearer cross-reference to Wiltshire Council's SFRA Level 1 and emerging SuDS SPD is appropriate. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP7-040]** were updated to strengthen signposting. The **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [REP7-042 to REP7-055 and REP3-063]** distinguish between formal drainage areas, where runoff is attenuated and controlled, and the wider Solar PV panelled areas,	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the objectives they support and the mechanisms through which they are secured, monitored and managed through the Flood Risk Assessment and Drainage Strategy documents [REP4-021 to REP4-036 and REP3-063], the Mitigation Route Map [REP7-109] and associated management plans. The Council is satisfied that the role and function of the structural and non-structural SuDS measures relied upon by the assessment have been sufficiently explained and secured within the wider flood risk and drainage management framework.	which remain predominantly vegetated and permeable. The measures relied upon to manage runoff, together with their objectives, monitoring requirements and securing mechanisms, are identified in Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. The matters raised regarding the ongoing monitoring, maintenance, performance review and governance of these measures are substantively addressed at 3.7.20 (Interrelationship Between Documents) and 3.7.25 (Monitoring, Governance and Performance Triggers) and are not repeated here. The Applicant understands that the Council have reviewed the DCO documents and is satisfied that the principal flood-risk, drainage and runoff-management controls are secured through the DCO Requirements and associated management plans, with compliance, monitoring, reporting, review and adaptive-management mechanisms providing ongoing oversight to maintain	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			the flood-risk and hydrological outcomes relied upon over the life of the Scheme.	
3.7.5	Assessment Methodology	Wiltshire Council acknowledges that the Applicant has adopted an assessment methodology aligned with relevant Environment Agency guidance and supported by appropriate evidence, datasets and analytical tools. The Council broadly accepts the assessment methodology and the conclusions reached within ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and the associated Flood Risk Assessment and Drainage Strategy suite [REP4-021 to REP4-036 and REP3-063] The Council also acknowledges the additional preventative, monitoring, inspection, reporting and corrective-action arrangements provided through the **Outline Construction Environmental Management Plan (Rev 7) [REP7-073], Outline**	The Applicant welcomes Wiltshire Council's confirmation that it broadly accepts the assessment methodology, including the evidence, datasets and analytical tools used, and the conclusions presented within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and the associated **Flood Risk Assessment and Drainage Strategy suite [REP7-042 to REP7-055 and REP3-063]**. The Applicant also notes Wiltshire Council's revised position that it does not seek empirical re-validation of the assumptions contained within the Flood Risk Assessment and Drainage Strategy suite, nor a separate standalone Hydrological Verification Framework, where the detailed DCO-approved management plans collectively provide appropriate	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Operational Environmental Management Plan (Rev 7) [REP7-075], Outline Soil Resources Management Plan (Rev 5) [REP7-079], Outline Landscape and Ecological Management Plan (Rev 4) [REP7-081], Outline Ecological Protection and Mitigation Strategy (Rev 6) [REP7-083], the Flood Risk Assessment and Drainage Strategy suite [REP4-021 to REP4-036 and REP3-063] and the Mitigation Route Map [REP7-109]. Collectively, these documents provide a substantially enhanced framework for managing soil condition, vegetation establishment, runoff, erosion and drainage performance during construction and operation. The Council recognises that the management-plan framework has developed significantly during the Examination and that many of the functions previously envisaged within a hydrological verification framework are now proposed to be delivered through the detailed CEMP, Water Management Plan, OEMP, SRMP,	arrangements for hydrological risk identification, mitigation, implementation, monitoring, review, corrective action and adaptive management. The hydrological risks identified through the assessment are supported by the controls established through the **Outline Construction Environmental Management Plan [REP7-073]**, **Outline Operational Environmental Management Plan [REP7-075]**, **Outline Soil Resources Management Plan [REP7-079]**, **Outline Landscape and Ecological Management Plan [REP7-081]** and **Outline Ecological Protection and Mitigation Strategy [REP7-083]**, together with the drainage measures established through the **Flood Risk Assessment and Drainage Strategy suite [REP7-042 to REP7-05]**. These outline documents establish the principles and controls which the detailed plans will translate into site-specific arrangements having regard to the final layout, construction phasing,	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		LEMP, EPMS, Drainage Strategies and the implementation framework secured through the Draft Development Consent Order (Rev 6) [REP7-007]. The Council therefore does not seek empirical re-validation of the assumptions contained within the Flood Risk Assessment and Drainage Strategy suite [REP4-021 to REP4-036 and REP3-063], nor a separate standalone Hydrological Verification Framework, where the detailed DCO-approved management plans collectively provide equivalent arrangements for hydrological risk identification, mitigation, implementation, monitoring, review, corrective action and adaptive management. The Council recognises that detailed layout, panel configuration, construction phasing, drainage design and field-specific management arrangements are not yet available and cannot reasonably be finalised at this stage. Consequently, the Council's remaining interest relates not to the	ground conditions, drainage characteristics and receptor sensitivities. This will include identification of the relevant hydrological risks and mitigation measures, temporary and permanent runoff-management measures, monitoring and inspection arrangements, responsibilities, investigation and corrective-action procedures and ongoing review. This directly reflects the matters identified by Wiltshire Council for the detailed design stage. The relationship between the identified hydrological risks, mitigation measures, monitoring requirements and securing mechanisms is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. The detailed plans are secured through the approval and implementation framework established by the **Draft Development Consent Order [REP7-007]**. The detailed monitoring, governance and performance-trigger arrangements	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		assessment methodology itself, but to ensuring that the hydrological risks identified through the assessment are appropriately addressed through detailed design, mitigation and management. To achieve this, the detailed management plans and associated strategies should clearly identify the principal hydrological risks relevant to the final design, the mitigation measures relied upon to manage those risks, and the mechanisms through which those measures will be secured, implemented, maintained and reviewed. In particular, the detailed plans should: • identify the principal hydrological risks relevant to each phase of development; • identify the mitigation measures relied upon to manage those risks; • identify the management plans, Draft DCO provisions and securing mechanisms through which those mitigation measures	are addressed at 3.7.25 and are not repeated here. The Applicant considers that Wiltshire Council's remaining concern regarding the translation of the assessed hydrological risks into detailed design, mitigation, monitoring and management is therefore addressed through the submitted outline plans and the DCO-secured detailed approval process. On that basis, the Applicant considers that there is no remaining substantive disagreement regarding the assessment methodology or the mechanism through which the identified hydrological risks will be managed.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		will be implemented and maintained; • demonstrate how field-specific conditions, construction phasing and site-specific drainage characteristics have informed detailed design decisions; • identify the temporary and permanent runoff-management measures required and the circumstances in which those measures will be deployed; • establish arrangements for identifying, investigating and addressing underperformance, degradation or emerging hydrological issues; • define responsibilities for implementation, maintenance, monitoring and corrective action; and • establish appropriate arrangements for ongoing review and transition to the long-term management regime.		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council acknowledges that the relationship between hydrological risks, mitigation measures and securing mechanisms is summarised within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP7-109]. The remaining requirement is to ensure that the identified hydrological risks and associated mitigation measures are appropriately translated into the detailed CEMP, Water Management Plan, OEMP, SRMP, LEMP, EPMS and Drainage Strategies and secured through the approval and implementation framework established by the Draft Development Consent Order (Rev 6) [REP7-007]. The Council broadly accepts the assessment methodology. The Council's remaining interest is ensuring that the hydrological risks identified through the assessment are supported by appropriate mitigation measures and securing mechanisms through the detailed plans approved pursuant to		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the Draft Development Consent Order. Subject to these matters being satisfactorily secured through the detailed design and management framework, the Council considers that the flood-risk, drainage and water-environment outcomes relied upon by the assessment can be appropriately maintained throughout the lifetime of the Scheme.		
3.7.6	Cumulative Assessment & Temporary Works	Wiltshire Council acknowledges that the potential cumulative effects of the Solar PV Sites, Cable Route Corridor, temporary works and permanent development have been assessed within ES Chapter 11 and the Flood Risk Assessment and Drainage Strategy documents. The Council broadly accepts the scope and conclusions of that assessment. The Council also acknowledges that the Outline CEMP, Outline SRMP, Outline LEMP and Outline OEMP provide complementary controls for temporary drainage, drainage reinstatement, soil handling, compaction, vegetation establishment,	The Applicant welcomes Wiltshire Council's acknowledgement that the potential cumulative effects of the Solar PV Sites, Cable Route Corridor, temporary works and permanent development have been assessed and that the Council broadly accepts the scope, methodology and conclusions of that assessment. Construction-phase and cumulative effects are assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and the **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		erosion, water quality and corrective action. The remaining detailed-stage requirement relates principally to construction phasing and establishment rather than the cumulative assessment itself. The detailed CEMP, Water Management Plan, SRMP and LEMP should identify the principal cumulative hydrological risks relevant to construction and establishment activities across the Solar PV Sites and Cable Route Corridor, together with the mitigation measures relied upon to manage those risks. The detailed plans should demonstrate how construction sequencing, field-specific conditions and drainage characteristics have informed temporary drainage, vegetation-establishment, erosion-control and runoff-management measures. They should also establish appropriate review, maintenance and corrective-action arrangements where site conditions or observed performance	**Drainage Strategies [REP7-042 to REP7-055 and REP3-063]**. The Applicant agrees that the detailed CEMP, Water Management Plan, SRMP, LEMP and associated strategies should translate the identified cumulative hydrological risks into site-specific management measures having regard to the final construction phasing, access arrangements, drainage infrastructure, ground conditions and construction methodologies. This will include temporary drainage and runoff controls, soil and vegetation management, erosion and sediment controls, watercourse crossing measures, inspection and maintenance requirements and corrective action where required. These principles are established through the **Outline Construction Environmental Management Plan [REP7-073]**, **Outline Operational Environmental Management Plan [REP7-075]**, **Outline Soil Resources**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		indicate that additional intervention is required. The phasing of construction activities, establishment measures and temporary runoff controls should be considered collectively where multiple sites or work areas are active simultaneously. Subject to these matters being secured through the detailed plans approved pursuant to the Draft DCO, the Council considers that cumulative hydrological risks can be managed appropriately and proportionately throughout construction, establishment and operation. However, as this is dependent upon the detailed design of the scheme and associated detailed management plans, the council is unable to mark this as agreed.	**Management Plan [REP7-079]**, **Outline Landscape and Ecological Management Plan [REP7-081]** and the **Flood Risk Assessment and Drainage Strategy suite [REP7-042 to REP7-055 and REP3-063]**. The relationship between the identified risks, mitigation measures, monitoring requirements and securing mechanisms is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. Temporary works will be managed through the construction-phase controls, including the detailed CEMP and Water Management Plan, with the interaction between construction activities and the relevant runoff, drainage, soil, vegetation and water-quality controls considered collectively where multiple work areas are active. The collective implementation of these controls is addressed further at 3.7.20 (Interrelationship Between Documents), 3.7.24 (Construction	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Phase Drainage and Monitoring) and 3.7.25 (Monitoring, Governance and Performance Triggers). Given Wiltshire Council's confirmation that it broadly accepts the cumulative assessment and that its remaining interest relates to the translation of the identified risks into the detailed DCO-approved plans, the Applicant considers that there is no remaining substantive disagreement on this matter.	
3.7.7	Residual Effects	Wiltshire Council broadly accepts the assessment of residual flood-risk and water-quality effects within ES Chapter 11, subject to the secured mitigation and management measures being implemented and maintained. The Council acknowledges that the current management plans provide mechanisms for inspection, monitoring, incident reporting, investigation, remediation and corrective action. These include the identification and treatment of compaction, ponding, erosion, vegetation failure, sediment	The Applicant welcomes Wiltshire Council's confirmation that it broadly accepts the assessment of residual flood-risk and water-quality effects presented within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and the associated **Flood Risk Assessment and Drainage Strategy suite [REP7-042 to REP7-055 and REP3-063].** The residual effects identified by the assessment are based upon implementation of the mitigation and	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		mobilisation, drainage defects and water-quality effects. The detailed drainage and management plans should identify the residual hydrological risks relevant to the final design, the mitigation measures relied upon to manage those risks and the arrangements for inspection, maintenance, monitoring, review and corrective action. Investigation should focus on establishing the root cause of observed issues, including vegetation-establishment failure, soil compaction, altered drainage pathways, construction effects, maintenance activities, climatic influences and other site-specific factors. Corrective action should address the identified cause rather than solely the observed symptom. Appropriate records should be maintained to demonstrate how issues were identified, investigated, remediated and closed. Where detailed design includes works affecting ordinary watercourses, Wiltshire Council considers that additional	management measures secured through the DCO. These measures are established principally through the **Outline Construction Environmental Management Plan [REP7-073]**, **Outline Operational Environmental Management Plan [REP7-075]**, **Outline Soil Resources Management Plan [REP7-079]**, **Outline Landscape and Ecological Management Plan [REP7-081]** and the **Flood Risk Assessment and Drainage Strategy suite [REP7-042 to REP7-055 and REP3-063]**. The Applicant agrees that the relevant mitigation measures must remain appropriately implemented, maintained and reviewed throughout construction, establishment and operation in order to maintain the flood-risk and water-quality outcomes relied upon by the assessment. The detailed DCO-approved plans will therefore identify the relevant hydrological risks and mitigation measures for the final design, together with the associated inspection, monitoring, maintenance,	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		assurance would be provided through documented justification for any new culvert, independent review by a suitably experienced Chartered Engineer with relevant drainage, hydraulic or watercourse expertise, and completion records supported by appropriate as-built information, photographs and condition records. The detailed drainage and management plans should also demonstrate that exceedance flow routes, overland-flow pathways and drainage connectivity are maintained through the final design and that flood risk is not increased elsewhere. Subject to these matters being secured through the detailed DCO-approved plans, Wiltshire Council considers that the residual flood-risk and water-quality effects can be managed appropriately throughout the lifetime of the Scheme. However, as this is dependent upon the detailed design of the scheme and associated detailed management plans, the council is unable to mark this as agreed.	investigation and corrective-action arrangements. Where inspection or monitoring identifies evidence of deterioration, underperformance or an unexpected hydrological response, the relevant management plans provide mechanisms for investigation of the cause and implementation of proportionate corrective or remedial action. This includes matters relating to soil condition and compaction, vegetation establishment, erosion, runoff and drainage performance, sediment mobilisation and water-quality protection. The detailed drainage and management arrangements will also maintain appropriate overland-flow pathways, drainage connectivity and exceedance routes and ensure that the completed development does not increase flood risk elsewhere. Where detailed design includes works affecting Ordinary Watercourses, the	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			relevant consent, approval and protective-provision requirements will apply, including Part 9 of Schedule 15 to the **Draft DCO [REP7-007]** where applicable. The existing provisions provide for drainage authority scrutiny of specified works, including proposed culverts, through submission and approval of plans and the applicable independent-review arrangements. The Applicant considers that these provisions provide appropriate and proportionate technical oversight and does not consider that further prescriptive requirements concerning the professional qualifications of independent reviewers or standardised completion documentation for all such works are necessary. Supporting design justification and completion information will be provided where required through the relevant approval process, proportionate to the nature and risk of the works. The relationship between the identified hydrological risks, mitigation measures and securing mechanisms is	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. The interaction between the relevant management measures is addressed further at 3.7.20 (Interrelationship Between Documents) and the monitoring, reporting, review and corrective-action arrangements at 3.7.25 (Monitoring, Governance and Performance Triggers). Given Wiltshire Council's confirmation that it broadly accepts the residual effects assessment and that its remaining interest relates to the translation and maintenance of the relevant mitigation measures through the detailed DCO-approved plans, the Applicant considers that there is no remaining substantive disagreement on this matter.	
3.7.8	Watercourse Easements	Wiltshire Council accepts the principle of watercourse buffers, drainage corridors and maintenance access	The Applicant notes Wiltshire Council's acceptance of the principle of watercourse buffers, drainage corridors	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		provisions adjacent to watercourses. The Council acknowledges that appropriate stand-offs, management controls, maintenance arrangements and drainage authority protections have been incorporated within the Scheme and secured through the DCO, the Outline Operational Environmental Management Plan (Rev 5) [REP4-051] and associated management framework. The Council is satisfied that suitable arrangements are in place to protect watercourse buffers, drainage corridors and maintenance access throughout the lifetime of the Scheme and to support the long-term function of watercourses and associated drainage features.	and maintenance access provisions. Appropriate stand-offs and buffers to Main Rivers and Ordinary Watercourses are secured through the relevant design and management controls, with wider buffers applied where required to address ecological sensitivities. The **Outline OEMP [REP7-073]** also provides for operational inspection and maintenance of drainage and surface water management measures. The wider arrangements for implementation, monitoring, reporting and governance are substantively addressed at 3.7.20 (Interrelationship Between Documents) and 3.7.25 (Monitoring, Governance and Performance Triggers) and are not repeated here. The relevant measures and securing mechanisms are also identified in Table 3-5 of the **Mitigation Route Map [REP7-109]**. The Applicant understands that the Council have reviewed the DCO documents and is satisfied that the principal flood-risk, drainage and runoff-management controls are secured through the DCO	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Requirements and associated management plans, with compliance, monitoring, reporting, review and adaptive-management mechanisms providing ongoing oversight to maintain the flood-risk and hydrological outcomes relied upon over the life of the Scheme.	
3.7.9	HDD Commitments	Wiltshire Council broadly supports the proposed use of HDD at sensitive crossings and acknowledges that the Applicant has clarified the framework for selecting HDD and alternative crossing methodologies through the Watercourse Crossing Schedule [REP3-122], associated mapping [REP3-139] and the construction control framework secured through the Outline Construction Environmental Management Plan (Rev 5) [REP4-049] The Council accepts that sensitive crossings have been identified, that methodology selection will be informed by site-specific environmental, engineering, hydrogeological and regulatory considerations, and that crossing-specific risks will be	The Applicant agrees that trenchless techniques, including HDD, are an appropriate means of reducing disturbance at sensitive watercourse crossings. The crossing strategy prioritises trenchless techniques at Main Rivers and other sensitive locations, while open-cut methods may be used for smaller Ordinary Watercourses where this can be demonstrated to avoid adverse effects on flood risk and the water environment. The final methodology will be selected having regard to site-specific environmental, engineering, ground condition and regulatory considerations. Sensitive crossings and the proposed crossing approach are identified	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		addressed through detailed design, construction controls, regulatory approvals and associated management plans. The Council is satisfied that an appropriate framework has been established for assessing and managing hydrological, hydrogeological and water-environment risks at sensitive crossings.	through **Appendix 9-9 Watercourse Crossing Schedule [REP3-122]** and associated mapping **[REP3-139]**. Crossing-specific risks will be addressed through detailed design and the relevant construction controls, including method statements, drilling fluid management, breakout contingency procedures, pollution prevention measures and, where required, further hydrogeological assessment. The relevant controls are secured through the **Outline CEMP [REP7-073]** and applicable DCO Requirements and regulatory approvals. The Applicant understands that the Council have reviewed the DCO documents and is satisfied that the principal flood-risk, drainage and runoff-management controls are secured through the DCO Requirements and associated management plans, with compliance, monitoring, reporting, review and adaptive-management mechanisms providing ongoing oversight to maintain the flood-risk and hydrological	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			outcomes relied upon over the life of the Scheme. At ISH5, the Applicant also clarified the position in relation to the Ordinary Watercourse between Fields D22 and D1. The feature has been identified within the Scheme and the detailed layout is required to retain its drainage corridor and existing conveyance function. The design will retain an appropriate stand-off and must not obstruct, culvert or redirect the existing flow route in a manner that increases flood risk. The adjacent BESS and substation are separately required through the **Design Principles and Parameters [REP7-066]** to be located within Flood Zone 1. Given the nature of the feature and the requirement to maintain its existing conveyance function, the Applicant does not consider that a separate site-specific hydraulic model is required at this stage.	
3.7.10	Draft DCO - HDD Approval	Wiltshire Council recognises that the DCO, CEMP and associated management plans provide a	The Applicant has substantively addressed the identification of sensitive crossings, selection of crossing	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		framework for the approval and control of HDD and other crossing methodologies. The Council acknowledges that sensitive crossings have been identified through the Watercourse Crossing Schedule [REP3-122], associated mapping [REP3-139] and the construction control framework secured through the Outline Construction Environmental Management Plan (Rev 5) [REP4-049]. The Council accepts that crossing-specific risks, methodologies and mitigation measures will be developed through detailed design and controlled through the CEMP, crossing-specific method statements, regulatory approvals and applicable drainage authority protective provisions. The Council is satisfied that an appropriate framework has been established for the assessment, approval, implementation and oversight of HDD and other crossing methodologies where required.	methodologies and assessment of crossing-specific risks at 3.7.9 (HDD Commitments) and does not repeat that response here. Detailed HDD design and construction methodology will be developed through detailed design and controlled through the detailed CEMP and associated crossing-specific method statements. Sensitive crossings are identified through **Appendix 9-9 Watercourse Crossing Schedule [REP3-122]** and associated mapping **[REP3-139]**. Relevant regulatory approvals and the drainage authority protective provisions will apply where required. The Applicant considers that this provides an appropriate approval and control framework without the need for an additional bespoke DCO Requirement. The Applicant understands that the Council have reviewed the DCO documents is satisfied that the principal flood-risk, drainage and runoff-management controls are secured through the DCO Requirements and associated management plans, with compliance, monitoring, reporting,	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			review and adaptive-management mechanisms providing ongoing oversight to maintain the flood-risk and hydrological outcomes relied upon over the life of the Scheme.	
3.7.11	Draft DCO - GIS Mapping	Wiltshire Council accepts that sufficient flood risk, drainage and water environment mapping has been provided for the purposes of the Examination. The Council acknowledges that spatial information relating to drainage assets, watercourses, buffers, mitigation measures and management requirements will be incorporated within the detailed design and management documentation and maintained through the relevant document-control and record-keeping arrangements. The Council also notes the Applicant's commitment to make GIS information available where reasonably required to support detailed design review and implementation. The Council is satisfied that appropriate arrangements are in place to support the management of flood risk, drainage	The Applicant notes Wiltshire Council's acceptance that sufficient flood risk, drainage and water environment mapping has been provided for the purposes of the Examination. Spatial information required to implement the detailed design and approved management measures will be incorporated within the relevant detailed design and management documentation and maintained through the applicable document-control and record-keeping arrangements. GIS data can also be provided to the LLFA at detailed design stage where reasonably required to support its review. The wider arrangements for document control, monitoring, records and governance are substantively addressed at 3.7.20 (Interrelationship	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		and water-environment assets throughout the lifetime of the Scheme through the wider management framework established by the Outline Operational Environmental Management Plan (Rev 5) [REP7-075] and Mitigation Route Map [REP7-109].	Between Documents) and 3.7.25 (Monitoring, Governance and Performance Triggers) and are not repeated here. The Applicant understands that the Council have reviewed the DCO documents and is satisfied that the principal flood-risk, drainage and runoff-management controls are secured through the DCO Requirements and associated management plans, with compliance, monitoring, reporting, review and adaptive-management mechanisms providing ongoing oversight to maintain the flood-risk and hydrological outcomes relied upon over the life of the Scheme. The Applicant does not consider that a separate GIS management requirement is necessary.	
3.7.12	Draft DCO - SuDS Guidance	Wiltshire Council accepts the Scheme's use of a combination of formal drainage infrastructure and non-structural runoff-management measures.	The Applicant welcomes Wiltshire Council's confirmation that it broadly accepts the Scheme's runoff-management approach, including the use of drainage infrastructure and non-structural SuDS measures, and acknowledges that the drainage hierarchy, runoff-management	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council is satisfied that the Draft Development Consent Order, the associated detailed-plan approval processes, the drainage protective provisions, the Flood Risk Assessment and Drainage Strategy suite and the environmental management plans provide an appropriate framework for securing detailed drainage, runoff-management and mitigation measures. The Council acknowledges that the relationship between identified hydrological risks, mitigation measures and securing mechanisms is summarised within Table 3-5 of the Mitigation Route Map and that the detailed DCO-approved plans provide the primary mechanism through which those measures will be translated into site-specific implementation, maintenance, monitoring and management arrangements. The Council's principal interest is ensuring that the detailed plans identify: • the hydrological risks relevant to the final design;	principles, maintenance requirements, inspection arrangements and corrective-action procedures are established within the submitted documents. The Applicant therefore considers that the SuDS and runoff-management approach relevant to this matter is agreed. The role of SuDS and runoff-management measures is addressed at 3.7.4 (SuDS and SFRA Linkage) and is not repeated in detail here. The **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [REP7-042 to REP7-055 and REP3-063]** establish the drainage hierarchy, runoff controls and maintenance principles applicable to the Scheme. These are supported by the operational management measures contained within the **Outline Operational Environmental Management Plan [REP7-075]**, **Outline Soil Resources Management Plan [REP7-079]** and **Outline**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• the mitigation measures relied upon to manage those risks; • the arrangements for inspection, maintenance, monitoring and review; and • the corrective-action and adaptive-management measures available where required. The Council recognises that different hydrological risks require different management approaches. Engineered drainage infrastructure should be designed, approved, inspected and maintained in accordance with the approved detailed design. Measures dependent upon vegetation, soil condition and diffuse runoff processes should be supported through appropriate management of vegetation establishment, soil condition, compaction, erosion resistance and drainage connectivity. The Council does not require a standalone Hydrological Verification Framework, routine Scheme-wide hydraulic testing or empirical re-	**Landscape and Ecological Management Plan [REP7-081]**. The secured management framework provides for inspection and maintenance of operational drainage and runoff-management measures and for monitoring of the physical conditions relevant to their continued effectiveness, including soil condition, vegetation establishment and erosion. Where inspections or monitoring identify deterioration or ineffective performance, the relevant management plans provide mechanisms for maintenance, corrective action and remedial intervention. Final inspection and maintenance arrangements for operational drainage infrastructure will be confirmed through detailed design and the detailed OEMP. The relationship between the relevant SuDS and runoff-management measures, associated monitoring requirements and the mechanisms by which they are secured is consolidated within Table 3-5: Hydrology, Flood Risk	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		validation of the assumptions contained within the Flood Risk Assessment and Drainage Strategy suite.	and Drainage of the **Mitigation Route Map [REP7-109]**. The Applicant notes Wiltshire Council's confirmation that the overall SuDS, drainage and runoff-management framework provides an acceptable and proportionate basis for maintaining the flood-risk, drainage and water-environment outcomes relied upon by the assessment. The Applicant agrees that the detailed plans prepared pursuant to the relevant DCO Requirements will need to reflect the final design and site-specific hydrological risks, and to identify the associated mitigation, inspection, maintenance, monitoring and corrective-action arrangements. The Applicant's position regarding the wider monitoring, review, corrective-action and performance-trigger arrangements is addressed at 3.7.25 (Monitoring, Governance and Performance Triggers) and is not repeated here.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.7.13	Draft DCO - OCEMP Protocols	Wiltshire Council accepts that the Outline Construction Environmental Management Plan includes appropriate flood-risk emergency and response procedures. The Council acknowledges that the Applicant has amended the construction-phase flood response arrangements to include registration with the Environment Agency Floodline service and additional clarification regarding flood-risk emergency procedures. The Council considers that the detailed CEMP should maintain appropriate flood-risk communication, monitoring and emergency-response arrangements throughout construction and should be informed by the latest available flood-warning information and site-specific conditions. Subject to these provisions being secured through the detailed CEMP approved pursuant to the Draft DCO, the Council considers this matter satisfactorily addressed.	The **Outline CEMP [REP7-073]** has been updated to provide additional clarity on flood risk emergency response procedures, including signing up to the EA's Floodline.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.7.14	Draft DCO - Floodplain Compensation	Wiltshire Council requested explicit reference to floodplain compensation principles and a clear explanation of the basis on which compensatory storage is not required. The Council acknowledges that the Applicant has now provided additional explanation within the Flood Risk Assessment and Drainage Strategy documents for Lime Down D [REP4-031] and Lime Down E2 [REP4-035] regarding floodplain interaction, displacement and compensatory storage requirements. The Council notes the conclusion that displacement associated with Solar PV panel supports would be de minimis and would not materially affect floodplain storage, flood levels, flood extents, flow routes or flood risk elsewhere, together with the Environment Agency's agreement that sufficient evidence has been provided to support this conclusion through the Statement of Common Ground with the Environment Agency [REP4-067]. The Council is satisfied that the floodplain compensation position has been clearly	The Applicant notes Wiltshire Council's request for clear explanation of the floodplain compensation position. The revised **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy Lime Down D [REP7-050]** and **ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy Lime Down E2 [REP7-054]** provide additional explanation of floodplain interaction and displacement, including the basis on which formal compensatory storage is not required. At ISH5, the Applicant further clarified that the extent of functional floodplain at Lime Down D is informed by the site-specific 3.33% AEP hydraulic modelling reported in the **Lime Down D Hydraulic Modelling Report [REP7-105]**. The Applicant's assessment therefore identifies the functional floodplain spatially by reference to the hydraulic evidence, rather than by agricultural field boundaries. The model outputs have informed the Scheme design and the	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		explained and appropriately documented.	relevant flood-resilience requirements. The BESS and substations are required to be located within Flood Zone 1 through the **Design Principles and Parameters [REP7-066]**, while Solar PV Panels interacting with the design flood extent are subject to the flood-resilience requirements set out in the **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy – Lime Down D [REP7-050]**.The assessments demonstrate that displacement associated with Solar PV Panel supports is de minimis and would not materially affect floodplain storage, flood levels, flood extents, flow routes or flood risk elsewhere. The Environment Agency has confirmed that sufficient evidence has been provided to demonstrate that the loss of floodplain storage would be negligible in the context of Gauze Brook and Gabriel's Well / Rodbourne Brook, as recorded at paragraph 3.3.10 of the **Statement of Common Ground with the Environment Agency**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			[REP4-067]. On that basis, formal compensatory storage is not required.	
3.7.15	Draft DCO - SPZ Monitoring	Wiltshire Council broadly accepts the groundwater protection and pollution-control measures proposed for Source Protection Zones. The Council acknowledges that the Applicant has clarified the circumstances in which groundwater monitoring may be required and has confirmed that monitoring will be applied on a proportionate risk-based basis informed by ground investigation, groundwater conditions, the nature of the proposed works and the sensitivity of the relevant groundwater receptors. The Council notes that groundwater monitoring and observation will be undertaken where necessary to inform construction methodologies, dewatering requirements and mitigation measures and that these controls are secured through the Outline Construction Environmental Management Plan (Rev 5) [REP4-049] and Requirement 13 of the draft DCO, together with the associated	The Applicant notes Wiltshire Council's broad acceptance of the groundwater protection and pollution-control measures proposed within Source Protection Zones. The presence of a Source Protection Zone does not, in itself, require groundwater monitoring. Monitoring will be applied on a proportionate, risk-based basis informed by pre-construction ground investigation, the nature and depth of the proposed works and the sensitivity of the relevant groundwater receptors. Where pre-construction ground investigation identifies shallow groundwater, or where groundwater could materially affect cable installation, trench stability, dewatering requirements or controlled waters receptors, groundwater observation and monitoring will be undertaken on a risk-based basis with reference to BS 5930. The findings will inform the detailed construction methodology, including any dewatering requirements	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		management framework. The Council is satisfied that an appropriate framework is in place for identifying, assessing and managing groundwater risks within Source Protection Zones.	and associated mitigation. These controls are secured through the **Outline CEMP [REP7-073]**. The wider monitoring, reporting, review and corrective-action framework is substantively addressed at 3.7.25 (Monitoring, Governance and Performance Triggers) and is not repeated here. The Applicant understands that the Council have reviewed the DCO documents andis satisfied that the principal flood-risk, drainage and runoff-management controls are secured through the DCO Requirements and associated management plans, with compliance, monitoring, reporting, review and adaptive-management mechanisms providing ongoing oversight to maintain the flood-risk and hydrological outcomes relied upon over the life of the Scheme.	
3.7.16	Draft DCO - CRC Runoff Control	Wiltshire Council accepts that the principal construction-phase runoff and drainage risks associated with the Cable Route Corridor have been identified and that appropriate runoff,	The Applicant notes Wiltshire Council's acceptance that the principal construction-phase runoff and drainage risks associated with the Cable Route Corridor have been identified and are	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		drainage, sediment-control and water-quality protection measures have been proposed. The Council acknowledges that the Applicant has provided additional detail regarding the implementation, monitoring, inspection, reporting, maintenance and corrective-action arrangements that will apply throughout construction through the Outline Construction Environmental Management Plan (Rev 6) [REP7-073], associated Water Management Plan provisions and the wider construction management framework. The Council is satisfied that an appropriate framework is in place to manage construction-phase runoff, drainage, sediment and water-quality risks associated with the Cable Route Corridor.	capable of being controlled through the proposed management framework. The matters raised regarding temporary drainage, runoff control, sediment control, water-quality protection, inspection, reporting and corrective action are substantively addressed at 3.7.24 (Construction Phase Drainage and Monitoring) and are not repeated here. The **Outline CEMP [REP7-073]** requires monitoring and maintenance of temporary drainage and sediment controls, provision of the Water Management Plan, defined responsibilities, inspections, reporting and corrective action throughout construction. The relationship between these measures, their monitoring requirements and securing mechanisms is identified in Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. The Applicant understands that the Council have reviewed the DCO documents and is satisfied that the principal flood-risk, drainage and	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			runoff-management controls are secured through the DCO Requirements and associated management plans, with compliance, monitoring, reporting, review and adaptive-management mechanisms providing ongoing oversight to maintain the flood-risk and hydrological outcomes relied upon over the life of the Scheme.	
3.7.17	Draft DCO - OLEMP Buffers & SuDS	Wiltshire Council supports the integration of landscape management, watercourse buffers, soil protection and runoff-management measures within the Scheme. The Council acknowledges that the Draft Development Consent Order, the Outline Operational Environmental Management Plan, Outline Landscape and Ecological Management Plan, Outline Ecological Protection and Mitigation Strategy and the Flood Risk Assessment and Drainage Strategy suite provide an appropriate framework for securing the long-term management of buffers, vegetation, runoff-	The Applicant welcomes Wiltshire Council's support for the integration of landscape management, watercourse buffers and runoff-management measures within the operational phase of the Scheme. The Scheme already incorporates measures which provide complementary hydrological and environmental functions, including watercourse buffers, establishment and management of vegetation, maintenance of existing drainage pathways, management of soil condition and compaction, and permeable surface water management measures. These measures form part	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		management measures and drainage infrastructure. The Council accepts that there is no requirement for the Scheme to remedy existing downstream flooding or deliver a specified flood-risk betterment outcome where the assessment demonstrates that flood risk will not increase elsewhere. The Council also does not consider that additional Scheme-wide hydraulic modelling is necessary. The Council recognises that the hydrological response of the completed Scheme will depend on the final layout, panel configuration, vegetation establishment, soil condition and drainage connectivity. The detailed DCO-approved plans should therefore demonstrate how these matters have informed the final design and identify the runoff-management, source-control, Natural Flood Management, landscape-management and SuDS measures incorporated, where relevant, to maintain the flood-risk and	of the mitigation and management framework for the Scheme and provide benefits in relation to runoff management, soil protection, erosion control, water quality and habitat connectivity. The Applicant agrees that the detailed LEMP, OEMP, EPMS and drainage arrangements should reflect the final layout and identify the operational hydrological risks relevant to the final design, together with the measures relied upon to manage those risks and the associated inspection, maintenance, review and corrective-action arrangements. This will include maintaining watercourse buffers and existing drainage pathways, managing vegetation establishment and soil condition, avoiding unacceptable runoff concentration, preferential flow paths or alteration of existing drainage pathways, and responding to evidence of erosion, deterioration or altered runoff behaviour where identified.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		drainage outcomes relied upon by the assessment. Subject to these matters being secured through the detailed DCO-approved plans, Wiltshire Council considers that the residual flood-risk and water-quality effects can be managed appropriately throughout the lifetime of the Scheme. However, as this is dependent upon the detailed design of the scheme and associated detailed management plans, the council is unable to mark this as agreed.	The relationship between the relevant operational hydrological risks, mitigation measures and securing mechanisms is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. The Applicant also welcomes Wiltshire Council's confirmation that additional Scheme-wide hydraulic modelling is not required. The Applicant considers that the remaining matters identified by the Council can be appropriately addressed through the detailed DCO-approved plans.	
3.7.18	Draft DCO - LLFA Engagement	The Applicant is encouraged to undertake early engagement with Wiltshire LLFA for discharge of flood risk-related Requirements.	The Applicant confirms its commitment to continued and early engagement with Wiltshire LLFA to facilitate the efficient discharge of flood risk and drainage-related Requirements.	**Agreed**
3.7.19	Strategic Flood Management and Betterment	Wiltshire Council acknowledges that the Applicant has assessed the potential for Natural Flood Management measures within Lime Down D to reduce downstream flood	The Applicant welcomes Wiltshire Council's acknowledgement that the **Lime Down D Natural Flood Management Viability Report [REP7-**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		risk at Corston and accepts that the measures assessed would not provide a significant reduction in downstream flood risk at Corston. The Council also acknowledges that the Scheme incorporates a range of complementary runoff-management, soil-management, vegetation-management and watercourse-protection measures secured through the Flood Risk Assessment and Drainage Strategy suite, the environmental management plans and the Draft DCO. The Council is not seeking a specified flood-risk betterment outcome and recognises the complexity of attributing catchment-scale flood-risk reductions to individual land-management measures. The Council's principal requirement remains that the Scheme does not increase flood risk elsewhere and that the mitigation measures relied upon by the assessment are appropriately secured, implemented and maintained.	**117]** has appropriately assessed the potential for NFM measures within Lime Down D to reduce downstream flood risk at Corston, and that the measures tested would not provide a material downstream flood-risk benefit. The Applicant also welcomes the Council's acknowledgement that the wider Scheme incorporates complementary hydrological and environmental measures, including soil and vegetation management, watercourse and riparian buffers, maintenance of existing drainage pathways and runoff-management measures. The relevant mitigation measures, monitoring requirements and securing mechanisms are identified in Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]** and are secured through the relevant detailed drainage design and management plans approved pursuant to the Draft DCO.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council considers that the detailed DCO-approved plans should identify the flood-risk and runoff-management risks relevant to the final design, the mitigation measures relied upon to manage those risks and the arrangements for implementation, maintenance, inspection and review throughout operation. Subject to these matters being secured through the detailed plans approved pursuant to the Draft DCO, the Council considers that strategic flood-management and betterment opportunities have been addressed proportionately. However, as this is dependent upon the detailed design of the scheme and associated detailed management plans, the council is unable to mark this as agreed.	The Applicant agrees that the detailed plans should translate the identified hydrological risks and mitigation measures into site-specific implementation, inspection, maintenance, review and corrective-action arrangements appropriate to the final design. The Applicant therefore considers that the Council's remaining interest can be addressed through the detailed design and management-plan approval process already secured by the Draft DCO and that no further Scheme-wide strategic NFM assessment is necessary. For clarity, strategic flood-risk betterment is separate from the LLFA drainage betterment standard applied to formal positively drained catchments. Where controlled discharge is required, the site-specific Drainage Strategies apply the LLFA requirement for a minimum 30% betterment over the equivalent greenfield discharge. The controlled	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			discharge rate results in proportionally greater betterment for larger storm events as the equivalent greenfield runoff rate increases, with attenuation provided for the 1 in 100 year event plus the relevant climate change allowance. This does not treat the wider vegetated and permeable Solar PV panelled areas as formal drainage catchments. Given Wiltshire Council's confirmation that it is not seeking a specified strategic flood-risk betterment outcome and considers that strategic flood-management and betterment opportunities have been addressed proportionately, the Applicant considers that there is no remaining substantive disagreement on this matter.	
3.7.20	Interrelationship Between Documents	Wiltshire Council acknowledges that the Applicant has provided a clear explanation of the relationship between the Flood Risk Assessment, Drainage	The Applicant agrees that the relationship between the hydrology-related documents and DCO controls should be clear and readily auditable.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Strategy, management plans, DCO Requirements, Articles and Protective Provisions that together comprise the flood risk and drainage management framework for the Scheme. The Council recognises that the Mitigation Route Map [REP7-109] provides a consolidated audit trail identifying the mitigation measures relied upon, their purpose, monitoring requirements and securing mechanisms, and that the Applicant has explained how these measures are implemented and managed across construction, operation and decommissioning. The Council also notes the relationship described between ES Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012], the Flood Risk Assessment and Drainage Strategy documents [REP4-021 to REP4-036 and REP3-063], the Outline CEMP, Outline OEMP, Outline SRMP, Outline LEMP and the Draft DCO. The Council is satisfied that the interaction between the relevant documents and DCO controls has been clearly described	The Applicant has therefore prepared the **Mitigation Route Map [REP7-109]** in response to ExQ1-GCT1.6. Its purpose is to provide a single audit trail showing how the mitigation relied upon in the ES is translated into identifiable and enforceable controls. For each commitment, the Route Map identifies the measure relied upon, its purpose, the phase in which it applies, the associated monitoring requirements and the DCO Requirement or other mechanism through which it is secured. Table 3-5: Hydrology, Flood Risk and Drainage provides that audit trail specifically for this topic. The framework operates in a clear hierarchy. First, **ES Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and the **Flood Risk Assessment and Outline Drainage Strategy Appendices 11-1 to 11-9 [REP7-042 to REP7-055 and REP3-063]** identify the relevant flood risk, drainage and water environment effects, the mitigation relied upon and the outcomes that mitigation is required to achieve. Secondly, those measures	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		and that the document integration issue has been addressed.	are secured through the DCO, including detailed design and drainage controls and the requirements for the relevant management plans. Thirdly, the detailed CEMP, OEMP, SRMP, LEMP and Decommissioning Strategy translate those secured requirements into phase-specific implementation, monitoring, inspection, maintenance, reporting and corrective-action procedures. The DCO Articles and Protective Provisions provide additional controls where activities interface with drainage assets, watercourses or the functions of the relevant Risk Management Authorities. The management plans are therefore complementary rather than independent documents. The **Outline CEMP [REP7-073]** provides the overarching construction-phase environmental management and assurance framework, including the Water Management Plan and links to the SRMP and other complementary plans. The **Outline OEMP [REP7-075]** provides the corresponding operational framework and expressly identifies the	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			FRA and Drainage Strategies, SRMP, LEMP and other plans as complementary controls. The **Outline SRMP [REP7-079]** provides the specialist controls for soil condition and compaction throughout the lifetime of the Scheme, while the LEMP provides the framework for establishment, management and monitoring of vegetation and landscape features. The **Outline Decommissioning Strategy [REP7-077]** applies equivalent environmental management, monitoring and corrective-action principles during decommissioning. The framework is also continuous between phases rather than consisting of discrete controls which cease without handover. The **Outline CEMP [REP7-073]** requires a final construction review and provides that the detailed CEMP will form the basis, together with the **Outline OEMP [REP7-075]**, for the operational management framework. Monitoring and corrective-action requirements	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			then continue through operation and, ultimately, decommissioning. The Applicant therefore considers that the concern identified by the LLFA regarding document integration has been addressed. The **Mitigation Route Map [REP7-109]** provides the single consolidated audit trail, while the legally secured requirements and certified control documents retain the detailed controls in the documents best suited to their implementation. Repeating the same requirements in a separate hydrology management plan or across each individual plan would not provide additional control and would introduce unnecessary duplication and the potential for inconsistency. For clarity, the Applicant also notes that Soil Management is secured through Requirement 18 of Schedule 2 of the draft DCO, rather than Requirement 17. Requirement 17 relates to public rights of way and permissive paths. The Applicant understands that the Council have reviewed the DCO	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			documents and is satisfied that the principal flood-risk, drainage and runoff-management controls are secured through the DCO Requirements and associated management plans, with compliance, monitoring, reporting, review and adaptive-management mechanisms providing ongoing oversight to maintain the flood-risk and hydrological outcomes relied upon over the life of the Scheme.	
3.7.21	Long-Term Vegetation Monitoring and Management	Wiltshire Council acknowledges that the vegetation-establishment and management framework has been materially strengthened through the Outline Operational Environmental Management Plan, Outline Landscape and Ecological Management Plan and associated management documents. The Council recognises that the framework now incorporates proactive measures relating to establishment, inspection, monitoring, maintenance, erosion control, remediation and corrective action.	The Applicant welcomes Wiltshire Council's confirmation that it is not seeking a separate Hydrological Verification Framework or re-validation of the hydrological assumptions contained within the Flood Risk Assessment and Drainage Strategy suite. The Applicant agrees that vegetation-related hydrological risks should be identified and managed through the detailed management plans. These include vegetation-establishment	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council accepts that vegetation condition will vary according to habitat type, soil characteristics, season, weather conditions and management objectives and does not consider that a single numerical vegetation-performance threshold would be appropriate across all parts of the Scheme. Wiltshire Council notes the Applicant's proposed 20% bare-ground trigger but considers that the technical basis for selecting this threshold has not been clearly demonstrated. The Council therefore remains unable to conclude that the proposed trigger is appropriate for identifying vegetation-related hydrological risks across the Scheme. The Council considers that the detailed LEMP should define the assessment methodology, the basis for any vegetation-condition trigger, how condition will be assessed and recorded, and the circumstances in which intervention may be required. The Council's remaining concern is to ensure that vegetation-related	failure, sparse or bare ground, panel drip-line erosion, rilling or channelisation, runoff concentration and deterioration in vegetation condition which could affect soil condition, erosion resistance, drainage connectivity or surface water runoff. These matters are addressed through the **Outline Operational Environmental Management Plan [REP7-075]**, **Outline Soil Resources Management Plan [REP7-079]**, **Outline Landscape and Ecological Management Plan [REP7-081]** and **Outline Ecological Protection and Mitigation Strategy [REP7-083]**, together with the relevant measures established through the **Flood Risk Assessment and Drainage Strategy suite [REP7-042 to REP7-055 and REP3-063]**. The relationship between the identified hydrological risks, mitigation measures, monitoring requirements and securing mechanisms is consolidated within	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		hydrological risks, including vegetation-establishment failure, bare ground, erosion, runoff concentration and prolonged periods of poor growing conditions, are identified and addressed through appropriate mitigation measures, monitoring arrangements and management responses secured through the detailed DCO-approved plans.	Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. Where inspection identifies material or persistent deterioration, the management framework provides for investigation and proportionate corrective action, which may include reseeding, adjustment of grazing or cutting regimes, local erosion repair, investigation and remediation of soil compaction and measures to restore diffuse surface water flow. The detailed plans will translate these requirements into site-specific inspection, maintenance, recording, review and corrective-action arrangements and are secured through the approval and implementation framework established by the **Draft Development Consent Order [REP7-007]**. The Applicant agrees that a single numerical vegetation-performance threshold would not be appropriate across the Scheme. The 20% bare-	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			ground trigger included within the Outline Landscape and Ecological Management Plan relates to grassland establishment and management, including identifying areas requiring reseeding. It is not a hydraulic performance threshold and does not represent an allowance for 20% bare ground within the hydrological assessment. The hydrological assessment relies on establishing and maintaining effective vegetative ground cover, including beneath and between Solar PV Panels, with the associated soil and runoff-management measures secured through the relevant management plans. Evidence of persistent bare ground, erosion, channelised runoff or deterioration in soil condition will be investigated and addressed where necessary, irrespective of whether the LEMP's numerical reseeding trigger has been exceeded. The detailed LEMP will define the relevant assessment areas, how vegetation condition will be	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			assessed and recorded, and the appropriate management responses. The Applicant therefore considers that the existing landscape and hydrological management provisions address the identified risks without requiring a separate numerical hydrological performance threshold.	
3.7.22	Recognition of the Hydrological Function of Vegetation and Soils	Wiltshire Council acknowledges that the Applicant has recognised the role of vegetation cover, soil structure, compaction management, infiltration, erosion resistance and drainage connectivity in influencing runoff behaviour and hydrological performance. The Council also acknowledges that these matters are addressed through the Flood Risk Assessment and Drainage Strategy suite and the associated environmental management plans secured through the Draft DCO The Council considers that the hydrological importance of vegetation and soil condition has been appropriately recognised within the	The Applicant welcomes Wiltshire Council's acknowledgement that the hydrological importance of vegetation cover, soil structure, compaction management, infiltration, erosion resistance and drainage connectivity has been appropriately recognised within the Scheme's flood risk and drainage assessment. These matters are addressed through the combined operation of the **Outline Construction Environmental Management Plan [REP7-073]**, **Outline Operational Environmental Management Plan [REP7-075]**, **Outline Soil Resources Management Plan [REP7-079]**, **Outline Landscape and Ecological Management Plan**	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		assessment and management framework. The detailed DCO-approved plans should translate these principles into site-specific management measures, inspection, maintenance, monitoring and corrective-action arrangements appropriate to the final design and operational requirements. Subject to these matters being secured through the detailed plans approved pursuant to the Draft DCO, the Council considers that the hydrological function of vegetation and soils can be managed appropriately throughout the lifetime of the Scheme. However, as this is dependent upon the detailed design of the scheme and associated detailed management plans, the council is unable to mark this as agreed.	**[REP7-081]** and **Outline Ecological Protection and Mitigation Strategy [REP7-083]**, together with the relevant measures established through the **Flood Risk Assessment and Drainage Strategy suite [REP7-042 to REP7-055 and REP3-063]**. Collectively, these documents provide controls for vegetation establishment and condition, soil structure and compaction, infiltration, erosion, runoff concentration and drainage connectivity. Monitoring and inspection focus on observable indicators of deterioration, including poor vegetation establishment, bare ground, rutting, persistent ponding, erosion, rilling, channelisation and changes to surface water runoff pathways. Where such indicators are identified, the relevant management plans provide for investigation, root-cause assessment, remediation, corrective action and subsequent review. The relationship between the identified hydrological risks, mitigation measures,	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			monitoring requirements and securing mechanisms is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. The detailed plans will translate these controls into site-specific implementation, inspection, maintenance, monitoring and corrective-action arrangements appropriate to the final design and are secured through the approval and implementation framework established by the **Draft Development Consent Order [REP7-007]**. The Applicant therefore agrees with Wiltshire Council that the hydrological functions of vegetation and soils can be appropriately managed through the detailed DCO-approved plans and considers that no separate hydrological verification framework is required.	
3.7.23	Soil Compaction Monitoring and Remediation	Wiltshire Council acknowledges that the Outline Soil Resources Management Plan and Outline Operational Environmental Management Plan provide a substantive framework for preventing,	The Applicant welcomes Wiltshire Council's acknowledgement that the soil-compaction monitoring and remediation framework is acceptable and proportionate, and agrees that monitoring should focus on disturbed	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		identifying and remediating soil compaction and recognise the importance of soil condition, compaction management, infiltration performance and drainage connectivity in maintaining hydrological performance. The Council accepts that routine intrusive testing across all operational panel areas would not be proportionate and that monitoring should instead focus on disturbed areas, representative higher-risk locations and areas where observable indicators suggest deterioration. The Council considers that investigation and remediation should focus on identifying the underlying cause of observed issues and implementing measures appropriate to the identified mechanism rather than solely addressing visible symptoms. Where appropriate, investigation should distinguish between construction-related impacts, maintenance-related impacts, drainage issues, vegetation-establishment	areas, representative higher-risk locations and areas where observable indicators suggest deterioration rather than routine intrusive testing across all operational panel areas. Soil condition and compaction are addressed principally through the **Outline Soil Resources Management Plan [REP7-079]**, supported by the **Outline Construction Environmental Management Plan [REP7-073]** and **Outline Operational Environmental Management Plan [REP7-075]**. These documents provide for prevention of avoidable compaction, inspection of soil condition, Visual Evaluation of Soil Structure, identification of compaction indicators, investigation of persistent ponding and other signs of deterioration, remediation where required and post-remediation review. Suitably qualified soil practitioners will be involved where appropriate. Monitoring will be targeted towards areas affected by trafficking, excavation, maintenance, repair or replacement, together with	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		issues and natural variation in soil condition. The detailed SRMP and OEMP should define responsibilities, inspection arrangements, remediation methods, recording procedures and circumstances where more detailed investigation may be required. The Council's remaining interest is ensuring that these requirements are translated into site-specific implementation, monitoring, remediation and review arrangements through the detailed DCO-approved plans. Subject to these matters being secured through the detailed plans approved pursuant to the Draft DCO, the Council considers that the soil-compaction monitoring and remediation framework provides an appropriate and proportionate basis for managing soil-related hydrological risks. However, as this is dependent upon the detailed design of the scheme and associated detailed management plans, the council is unable to mark this as agreed.	hydrologically sensitive or higher-risk locations and locations where observable indicators such as rutting, persistent ponding, erosion, vegetation decline or changes to surface water runoff pathways indicate potential deterioration of soil condition. Where deterioration is identified, investigation will seek to establish the underlying cause, including whether this relates to construction or maintenance-related compaction, drainage conditions, vegetation establishment, climatic influences or natural variation in soil condition. Appropriate remediation will then be implemented and followed by inspection or monitoring to confirm that the identified issue has been satisfactorily addressed. The relationship between soil-related hydrological risks, mitigation measures, monitoring requirements and securing mechanisms is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. The detailed Soil	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Resources Management Plan and Operational Environmental Management Plan will translate these requirements into site-specific responsibilities, inspection, remediation, recording and review arrangements and are secured through the approval and implementation framework established by the **Draft Development Consent Order [REP7-007]**. The Applicant therefore agrees with Wiltshire Council that soil condition and compaction can be appropriately monitored, investigated and remediated through the detailed DCO-approved management plans without the need for a separate hydrological verification framework.	
3.7.24	Construction Phase Drainage and Monitoring	Wiltshire Council acknowledges that the Applicant has established a substantially strengthened framework for managing construction-phase drainage, runoff, sediment and water-quality risks through the Outline	The Applicant notes Wiltshire Council's acceptance that an appropriate construction-phase framework is in place for temporary drainage, runoff control, sediment management, water-quality protection, inspection,	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Construction Environmental Management Plan, including the associated Water Management Plan provisions, together with the wider soil, drainage and environmental management framework. The Council accepts that this framework provides for temporary drainage and runoff controls, sediment and water-quality protection, inspection, monitoring, maintenance, incident response, reporting and corrective action during construction. The Council's remaining interest is to ensure that the detailed CEMP and Water Management Plan provide an effective transition from construction into the initial operational and vegetation-establishment period. In particular, the detailed plans should: • identify hydrologically sensitive and higher-risk locations requiring inspection during construction and following completion of the relevant works;	monitoring, maintenance, reporting, flood response and corrective action. These controls are principally established through the **Outline Construction Environmental Management Plan [REP7-073]**, supported by the **Outline Soil Resources Management Plan [REP7-079]** and the relevant measures established through the **Flood Risk Assessment and Drainage Strategy suite [REP7-042 to REP7-055 and REP3-063]**. The detailed CEMP will include a Water Management Plan which will define site-specific monitoring locations, parameters, frequencies, methods and trigger levels proportionate to the construction activity, ground conditions and sensitivity of the receiving environment. It will also establish the temporary drainage, runoff and sediment-control measures required for the relevant construction phase, including inspection, maintenance and corrective-action requirements.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• define the construction-completion and handover inspections required for temporary and permanent drainage, runoff-control and sediment-control measures; • record the condition of soils, vegetation, drainage features, runoff pathways and erosion- or sediment-sensitive locations at handover; • identify any outstanding remediation, reinstatement or establishment measures and the arrangements for confirming their completion; • define the indicators that would trigger further investigation, maintenance or corrective action, including persistent ponding, erosion, sediment mobilisation, vegetation failure, altered runoff pathways or ineffective drainage performance; • establish responsibilities, reporting and review arrangements during the initial	Construction monitoring will include the condition and performance of temporary drainage and runoff controls, evidence of erosion or sediment mobilisation, water-quality risks, condition of existing drainage pathways and relevant soil-condition indicators. Where monitoring or inspection identifies deterioration or ineffective performance, the management framework provides for investigation, maintenance, additional controls and corrective or remedial action. Construction handover into operation is supported by the **Outline Operational Environmental Management Plan [REP7-075]** and **Outline Soil Resources Management Plan [REP7-079]**, so that any residual matters relating to soil condition, vegetation establishment, drainage condition or runoff pathways can continue to be monitored and managed through the operational framework. The Outline CEMP also requires the Environmental Manager to undertake a final review following completion of the	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		operational and vegetation-establishment period; and • provide for the transition to the longer-term risk-based inspection, monitoring and maintenance arrangements established through the detailed OEMP, SRMP, LEMP and drainage strategies. The Council is not seeking empirical re-validation of the hydrological assumptions contained within the Flood Risk Assessment and Drainage Strategy. Its remaining concern is to ensure that construction-related hydrological risks are appropriately managed through completion and handover, and that any deterioration or ineffective mitigation identified during the initial operational period results in timely investigation, remediation and corrective action. Subject to these arrangements being appropriately secured through the detailed plans approved pursuant to the Development Consent Order, the Council considers that the construction-	works, supported by the inspection, monitoring and corrective-action records retained under the CEMP. This provides the mechanism for identifying outstanding drainage, soil-condition, reinstatement or erosion-control matters at construction close-out, with any matters requiring ongoing inspection or remedial intervention carried forward into the relevant detailed operational management arrangements. The detailed CEMP and Water Management Plan will establish the proportionate site-specific close-out checks and recording arrangements, with any outstanding actions transferred to the relevant operational management plans. The relationship between the construction-phase hydrological risks, mitigation measures, monitoring requirements and securing mechanisms is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. The detailed plans are secured through the approval and implementation framework established	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		phase drainage and monitoring framework provides an acceptable and proportionate basis for managing construction-related flood-risk, runoff, sediment and water-quality effects. However, as this is dependent upon the detailed design of the scheme and associated detailed management plans, the council is unable to mark this as agreed.	by the **Draft Development Consent Order [REP7-007]**. The Applicant notes Wiltshire Council's confirmation that empirical re-validation of the hydrological assumptions within the FRA/DS suite is not required and considers that the existing construction close-out and DCO-secured operational management arrangements provide the proportionate assurance sought.	
3.7.25	Monitoring, Governance and Performance Triggers	Wiltshire Council acknowledges that the Applicant has substantially strengthened the monitoring, inspection, reporting, corrective-action and adaptive-management arrangements through successive iterations of the Outline Construction Environmental Management Plan (Rev 7) [REP7-073], Outline Operational Environmental Management Plan (Rev 7) [REP7-075], Outline Soil Resources Management Plan (Rev 5) [REP7-079], Outline Landscape and Ecological Management Plan (Rev 4) [REP7-081], Outline Ecological Protection and	The Applicant welcomes Wiltshire Council's acknowledgement that the monitoring, inspection, reporting, corrective-action and adaptive-management framework has been substantially strengthened during the Examination, and that many of the functions previously envisaged within a standalone hydrological verification framework are now provided through the detailed DCO-approved management plans. The Applicant agrees that the detailed plans should clearly identify the principal hydrological risks relevant to	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Mitigation Strategy (Rev 6) [REP7-083] and Mitigation Route Map [REP7-109]. The Council accepts that the principal controls relating to runoff, flood risk, vegetation establishment, soil condition, compaction, erosion, temporary works, drainage management and long-term maintenance are intended to be secured through the detailed plans prepared pursuant to the Draft Development Consent Order (Rev 6) [REP7-007], including the detailed CEMP, Water Management Plan, OEMP, SRMP, LEMP, EPMS, Drainage Strategies and associated management documents. The Council acknowledges that the management framework has developed significantly during the Examination and that additional controls, monitoring arrangements and securing mechanisms have been incorporated into the outline plans, the Flood Risk Assessment and Drainage Strategy suite [REP4-021 to REP4-036 and REP3-063] and the Mitigation	the final design, the mitigation measures relied upon to manage those risks, the mechanisms through which those measures are secured, and the arrangements for implementation, inspection, monitoring, maintenance, review and corrective action. These controls are established through the **Outline Construction Environmental Management Plan [REP7-073]**, **Outline Operational Environmental Management Plan [REP7-075]**, **Outline Soil Resources Management Plan [REP7-079]**, **Outline Landscape and Ecological Management Plan [REP7-081]**, **Outline Ecological Protection and Mitigation Strategy [REP7-083]** and the relevant measures established through the **Flood Risk Assessment and Drainage Strategy suite [REP7-042 to REP7-055 and REP3-063]**. During construction, the detailed CEMP and Water Management Plan will identify site-specific monitoring locations, parameters, frequencies, methods and trigger levels	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Route Map [REP7-109]. The Council also recognises that many of the functions previously envisaged within a standalone hydrological verification framework are now proposed to be delivered through the detailed management plans and associated DCO-secured approval processes. In light of these revisions, the Council's focus has evolved from the form of any standalone framework document to ensuring that the detailed DCO-approved plans collectively provide robust arrangements for hydrological risk identification, mitigation, implementation, monitoring, review, corrective action and adaptive management. The Council's remaining interest is therefore focused on ensuring that the detailed plans clearly identify the principal hydrological risks relevant to the final design, the mitigation measures relied upon to manage those risks, and the mechanisms through which those measures will be secured, implemented, maintained, monitored	proportionate to the activity, ground conditions and sensitivity of the receiving environment. Monitoring will address the performance of temporary drainage and runoff controls, erosion and sediment mobilisation, water-quality risks, soil condition and relevant drainage pathways. Where monitoring or inspection identifies deterioration or ineffective performance, investigation, maintenance, additional controls and corrective or remedial action will be implemented as appropriate. During operation, the detailed OEMP, SRMP, LEMP and EPMS will provide the corresponding framework for monitoring the physical conditions and mitigation measures relevant to hydrological performance. These include soil condition and compaction, vegetation establishment and condition, erosion, rilling, channelisation, persistent ponding, drainage condition and changes to surface water runoff pathways. Performance indicators and intervention criteria will be appropriate	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		and reviewed. In particular, the detailed plans should: • identify hydrologically sensitive, representative and higher-risk locations; • identify the principal hydrological risks relevant to the final design and operational arrangements; • identify the mitigation measures relied upon to manage those risks; • identify the management plans, DCO requirements and securing mechanisms through which those mitigation measures will be implemented and maintained; • define performance indicators and explain the basis upon which they have been selected; • address construction handover and vegetation-establishment-period management; • identify temporary mitigation measures where required;	to the mechanism being monitored. Engineered drainage assets will be assessed against their approved design and maintenance requirements; construction water management will use activity- and receptor-specific monitoring and trigger levels; soil condition will be assessed through the procedures established in the detailed SRMP; and vegetation and erosion controls will respond to observable deterioration and evidence of altered runoff behaviour. This avoids the use of arbitrary universal thresholds while ensuring that deterioration relevant to flood risk, drainage or water quality results in investigation and proportionate corrective action. Where an issue is identified, the management framework will require investigation of the underlying cause, implementation of appropriate corrective action, recording of the action taken and subsequent review to confirm that the issue has been satisfactorily addressed. This provides the auditable relationship between the identified risk, monitoring outcome,	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• demonstrate that exceedance flow routes, drainage connectivity and runoff-management functions are maintained; • establish investigation and root-cause assessment procedures; • define corrective-action and adaptive-management requirements; • provide an auditable record of actions, decisions and outcomes; and • establish the criteria for transition to the longer-term monitoring and maintenance regime. The Council acknowledges that the relationship between hydrological risks, mitigation measures, monitoring provisions and securing mechanisms is summarised within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP7-109]. The Council's remaining interest is ensuring that those arrangements are	intervention and closure sought by Wiltshire Council. Construction handover and the vegetation-establishment period will be addressed through the transition from the detailed CEMP and Water Management Plan into the detailed OEMP, SRMP, LEMP and EPMS. The scope and frequency of longer-term monitoring and maintenance can then be reviewed on a risk basis having regard to the condition and performance of the relevant mitigation measures and any issues identified during establishment. The relationship between the identified hydrological risks, mitigation measures, monitoring provisions and securing mechanisms is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the **Mitigation Route Map [REP7-109]**. The detailed plans are secured through the approval and implementation framework established by the **Draft Development Consent Order [REP7-007]**, through which Wiltshire Council will remain engaged	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		translated into site-specific implementation, management, maintenance and corrective-action procedures through the detailed plans approved pursuant to the Draft Development Consent Order (Rev 6) [REP7-007]. The Council is not seeking empirical re-validation of the hydrological assumptions contained within the Flood Risk Assessment and Drainage Strategy suite [REP4-021 to REP4-036 and REP3-063]. Rather, the Council seeks confidence that the hydrological risks identified through the assessment are supported by appropriate mitigation measures and that those measures are clearly secured, implemented, maintained, monitored, reviewed and adapted where required through the detailed plans approved pursuant to the Draft Development Consent Order (Rev 6) [REP7-007]. The Council expects to remain engaged throughout the preparation and approval of the detailed strategies secured through the Draft Development	in agreeing the necessary field-specific mitigation, monitoring and management arrangements. The Applicant therefore agrees with Wiltshire Council that empirical re-validation of the hydrological assumptions within the Flood Risk Assessment and Drainage Strategy suite is not required, and considers that the DCO-secured monitoring, governance and adaptive-management framework provides an appropriate and proportionate basis for maintaining the flood-risk, drainage and water-environment outcomes relied upon by the assessment.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Consent Order (Rev 6) [REP7-007] and considers this approval process to be the principal mechanism for agreeing any required field-specific mitigation, monitoring and management requirements. Subject to these coordinated provisions being appropriately secured through the detailed plans and management framework established by the Draft Development Consent Order (Rev 6) [REP7-007], the Council considers that the proposed governance, monitoring and management framework provides an acceptable and proportionate basis for maintaining the flood-risk, drainage and water-environment outcomes relied upon by the assessment.		
3.7.26	Draft DCO - Ordinary Watercourse Consent and Environmental Permitting	The Applicant has accepted amendments to Article 17 to clarify the relationship between the discharge powers contained within Article 17 and the approval process contained within Part 9 of Schedule 15. The agreed drafting has been incorporated within Revision 4 and subsequently Revision 5 of the draft DCO. The parties agree	The Applicant accepted the proposed amendment to Article 17 and incorporated the agreed wording within Revision 4 of the **Draft DCO [REP4-004]**.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		that the revised drafting provides appropriate clarification regarding the approval of works affecting watercourses, public sewers and drains under the control of a drainage authority and avoids unnecessary duplication between approval mechanisms. The parties further agree that the Draft DCO does not remove, replace or disapply any separate statutory consent or permitting requirements that may be required outside the DCO process, including Ordinary Watercourse Consent and Environmental Permits where applicable.		

3.8 Cultural Heritage (Built heritage and Archaeology)

Table 3-8: Cultural Heritage (Built heritage and Archaeology)

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.8.1	Legislation and Policy	Wiltshire Council consider that the relevant legislation and guidance has been referred to in the assessment.	The Applicant considers that the assessment provided in **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** is in line with appropriate legislation, policy and guidance.	**Agreed**
3.8.2	Methodology	Wiltshire Council consider that the assessment methodology that has been followed is robust and proportionate and aligns with best practice. The methodology reflects consultation with the Council, including in respect of the requirement to exercise professional judgement.	The methodology adopted within **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** is in line with appropriate guidance and has been derived following consultation with relevant stakeholders (i.e. Wiltshire Council and Historic England).	**Agreed**
3.8.3	Baseline	Wiltshire Council consider that built heritage assets have been correctly identified and their significance assessed in an appropriate manner which reflects baseline site conditions.	The baseline conditions which are detailed in **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** are representative of the baseline site conditions.	**Agreed**
3.8.4	Assessment: built heritage	Wiltshire Council is satisfied that the heritage assessment is robust and credible, with no major gaps in scope or methodology. Where impacts have	The assessment results set out within **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**, supported by supported by **ES Volume 3, Appendix**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		been identified, it is generally agreed that these are correctly assessed as less than substantial harm, generally at a low level. While a few minor omissions or differences of opinion are noted, the Council considers that these do not alter the overall conclusion that there will be no significant residual effects on built heritage assets.	**12-1: Heritage Statement [APP-219],** including likely significant effects and residual effects are acceptable.	
3.8.4a	Assessment: built heritage	Following consideration of the third-party **Relevant Representations, Representation by Matthew Dominik Shipp [RR-3086]** one additional issue was raised: the Council considering that the potential impact on the significance of the Grade II* Grittleton House from the temporary construction compound and cable route (Works 5A) within its setting, merited further assessment. Following that assessment, this has not altered the overall conclusion and both parties are agreed that the level of harm would not equate to a significant heritage effect but there may be a need for additional mitigation to address the socio-economic impact which has the	Grittleton House (NHLE 1022310) is assessed within **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, which considers its significance, setting and historic relationship with the wider Grittleton Estate. The assessment concludes that there would be no harm to its heritage significance as a result of the Scheme. Both parties agree that it would not result in any significant heritage effects. Any construction-related effects would be temporary and localised in nature and managed through the **Outline CEMP [REP7-073]**. A site visit to the property grounds, interior rooms with views towards the	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		potential to have an indirect impact on the conservation of the asset. Post hearing amendments made to the OCEMP Revision 8 (2 October 2026) **[APP/7.12]** are welcomed but Wiltshire Council remain unconvinced these will be sufficient to fully mitigate the impacts on the Grittleton House business. Without an agreed business compensation fund to have recourse to in the event of a downturn in bookings due to the impact of the proposed scheme there can be no certainty that, should the business become unviable or not have the funds to continue investment in the upkeep of the heritage asset, that 'no harm' to the heritage would be the eventual outcome from these indirect socio-economic impacts.	Scheme, and land within the Scheme was undertaken with the Conservation Officer on 5 May 2026.	
3.8.5	Assessment: archaeology	Wiltshire Council considers that, although significant archaeological activity has been identified, no heritage assets present an overriding constraint to the development, provided an agreed programme of archaeological mitigation is implemented. Impacts	The archaeological assessment provided in **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** is supported by the results of a programme of archaeological	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		would be addressed through scheme design changes, archaeological excavation, or non-intrusive construction methods, and WCAS agrees that no significant residual effects on cultural heritage are predicted during construction. Wiltshire Council requires full final reports from the trenching and geophysics prior to the determination of this application.	evaluation see the following ES appendices: • **ES Volume 3, Appendix 12-2: Archaeological Desk – Based Assessments [APP-220 to APP-221]**; • **ES Volume 3, Appendix 12-3: Aerial Photographic and LiDAR mapping and interpretation [APP-222]**; • **ES Volume 3, Appendix 12-4: Archaeological Geophysical Survey Reports [APP-223 to APP-224]**; and • **ES Volume 3, Appendix 12-5: Archaeological Evaluation (interim reports) [APP-225 to APP-229]** Archaeological evaluation works were undertaken in line with a Written Scheme of Investigation (WSI) agreed with the Local Authority's Planning Archaeologists. **ES Volume 3, Appendix 12-5: Archaeological Evaluation (interim reports) [APP-225 to APP-229]**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			were submitted as part of the DCO Application and **ES Volume 3, Appendix 12-4: Archaeological Geophysical Survey Reports [APP-223 to APP-224]** was submitted as part of the DCO Application**.** An updated report covering the geophysical survey of the cable route corridor will be submitted, once available. Full evaluation reports were submitted to Wiltshire Council on the 18th May 2026. **ES Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [REP7-056]** will be updated, as required, with the results of these updated assessments. Archaeological evaluation has been undertaken in accordance with Paragraph 5.9.10 of NPS EN1, Paragraphs 2.10.113 and 2.10.115 of NPS EN3 and Paragraph 207 of NPPF to ensure the level of detail provided as part of the assessment is proportionate to the assets' importance and no more than is sufficient to understand the	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			potential impact of the proposal on their significance. The works undertaken as part of the archaeological evaluation is considered appropriate for the assessment. Following the implementation of mitigation proposed in **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**, there would be no significant effects to archaeological assets.	
3.8.6	Approach to mitigation: built heritage	Wiltshire Council notes that the embedded mitigation proposed is generally extensive. No additional built heritage mitigation is currently proposed, which is considered reasonable given the generally low level of residual harm. The Council identified a key omission: there is no provision for monitoring or adaptive management to assess the effectiveness of mitigation or respond if it proves inadequate. Additional wording has been added to the Outline Construction Traffic Management Plan **[REP5-083]** to clarify the limited scope of works	Where impacts have been identified to built heritage assets these have been appropriately mitigated (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** for embedded mitigation and Section 12.11 for additional mitigation). Mitigation measures for built heritage assets are appropriately managed through the **Outline CEMP [REP7-073]**, **Outline OEMP [REP7-075], Outline LEMP [REP7-081]** and the **Outline CTMP [REP7-087]**, which is secured through the DCO. The wording ensures that approval is required from the Council and consultation with both	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		intended to the track to the south-west of Rodbourne Road and this has addressed the concern previously raised. Amendments to the **Outline CEMP [REP7-073]** and **Outline CTMP [REP5-083]** intended to mitigate the impact on the Rodbourne Conservation Area via the involvement of the Conservation Officer in the design of the works are therefore sufficient as an additional safeguard in this instance. Post-hearing, 1.3.16-18 have been added to the OLEMP Version 5 [APP/7.18] and at Appendix B. Wiltshire Council welcomes these additional provisions and considers that they are sufficient to secure the monitoring and assessment of the proposed landscape mitigation and for making any required amendments to ensure that the objectives are met.	the Conservation officer as well as the highways officer, and therefore impacts can be mitigated in relation to cultural heritage.	
3.8.7a	Approach to mitigation: archaeology	Significant archaeological remains have been identified. Wiltshire Council cannot confirm the adequacy of archaeological protection as the mitigation strategy is incomplete:	The Applicant considers the archaeological evaluation works undertaken to support the DCO application and the archaeological mitigation strategy to be proportionate and in line with appropriate standards	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Full trial trenching and geophysical survey of the CRC is outstanding Strip, Map and Record excavations are required for key sites Site-Specific Written Schemes of Investigation (SSWSIs) should be produced for approval by the council A written programme of archaeological investigation for on-site and off-site work, including analysis, publishing and archiving of the results should be produced for approval by the council A public engagement plan is required during mitigation works.	and guidance. The undertaking of outstanding geophysical survey on the cable route was discussed in meetings with Wiltshire Council on the 13.07.26 and 27.07.26. During these meetings Wiltshire Council agreed that the geophysical survey could be undertaken post-determination and the AMS was updated to provide provision for the works. **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [REP7-056]** details the mitigation measures to safeguard archaeological assets including preservation in situ (using a non-intrusive construction methodology) and mitigation by record (including strip, map and sample) and is considered acceptable. The **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [REP7-056]**, provides an overarching methodology for undertaking a programme of archaeological mitigation within the Scheme. Site Specific Written Schemes of Investigations (SSWSIs)	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			that detail site-specific mitigation measures will be appended to the Outline AMS in advance of each phase of mitigation works. It is intended that these SSWSIs will include information regarding the programme of archaeological investigation for on-site and off-site work (including analysis, publishing and archiving of the results) as well as public engagement plans, and will be approved by Wiltshire Council in consultation with Historic England prior to their implementation. The Applicant has looked to undertake meaningful consultation with both Historic England and Wiltshire Council from the pre-application period through to the examination period. This includes rapid updates to the AMS during the week commencing 28th November to ensure the AMS provides sufficient technical detail to ensure the best approach is taken to mitigating archaeological remains and mechanisms are in place to ensure any detail not included within the AMS will	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			be included within SSWSIs following detailed design of the Scheme. The final mitigation strategies are set out in the Final AMS secured through Requirement 12 of the Draft DCO.	
3.8.7b	Approach to mitigation: archaeology	A Detailed Archaeological Mitigation Strategy (DAMS) has not yet been submitted, although this is required during the examination The archaeological mitigation for the cable route has not been included within any of the scheme documentation to date. This should be agreed and included within the DAMS, that Wiltshire Council require to be produced and agreed prior to the close of the examination, or submitted to the LPA for approval post consent via Requirement 12.	The Applicant understand the main area of disagreement regarding the approach to archaeological mitigation relates to the production of a Detailed Archaeological Mitigation Strategy (DAMS). As detailed in ISH5, the Applicant does not consider the production of a DAMS to be necessary in the ensuring adequate mitigation for archaeological remains that could be impacted upon by the Scheme. The Applicant maintains their position that the AMS is sufficient to mitigate any impacts as a result of the Scheme to archaeological remains and is proportionate to the nature of archaeological remains identified and the nature of the proposed development.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.8.8	Cumulative / in-combination effects,	With regard to the assessment for cumulative / in-combination effects, the assessment methodology and need for professional judgement were discussed post statutory consultation stage and the cumulative assessment is proportionate. Following discussion between the council and applicant, the applicant refused to commit to producing a DAMS, secured by Requirement 12.	The cumulative impacts have been assessed with consideration to the Scheme and other proposed and identified developments (see Section 12.12 of **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**). This approach is in line with the methodology detailed in Section 6.8 of **ES Volume 1, Chapter 6: EIA Methodology [APP-058]**, consultation undertaken with Wilshire Council, as well as guidance and policy (i.e. Paragraph 56 of Historic England Advice Note 15: Commercial Renewable Energy Development and the Historic Environment and Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment). No significant cumulative effects were identified to heritage assets. **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** considered impacts on cultural heritage and archaeology from other topics. As such no in-combination effects	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			alongside cultural heritage were identified as a result of the Scheme.	

3.9 Transport and Access

Table 3-9: Transport and Access

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.9.1	Legislation and Policy	Wiltshire Council provided no comment on legislation and policy used for the assessment.	The Applicant considers that **ES Volume 1, Chapter 13: Transport and Access [REP7-015]** has identified and appropriately considered all applicable legislation and policy.	**Agreed**
3.9.2	Methodology	Wiltshire Council provided no comment on the methodology used for assessment.	The methodology adopted within **ES Volume 1, Chapter 13: Transport and Access [REP7-015]** has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable.	**Agreed**
3.9.3	Baseline	Wiltshire Council provided no comment on the baseline used for assessment in its relevant representation. However, subsequent review of the other relevant representations, and expressly the Stop Lime Down representation, has drawn attention to the existing use of the narrow roads being proposed for HGV construction access by cyclists, walkers and equestrians.	The baseline conditions which are detailed in **ES Volume 1, Chapter 13: Transport and Access [REP7-015]** are representative of the baseline site conditions. This includes an assessment of Non-Motorised Users (NMUs). A Technical Note **[REP6-061]** provided on NMU surveys at Deadline 6 has	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Technical Note [REP6-061] provided on NMU surveys at Deadline 6 has supplemented and informed the baseline and the content is deemed adequate.	supplemented and informed the baseline assessment.	
3.9.4a	Assessment Results- Construction Routes	The ES identifies Highway Improvement Areas (HIAs) for facilitating construction, but these do not appear to cover minor roads providing primary access to Lime Down Sites A-C and Lime Down Site D. A summary of Wiltshire Council's latest position is provided below: The proposed scope of works in the Highway Improvement Area on Alderton Road are suitable and allow two 16.5 metre articulated HGVs to pass in all cases. These works are shown in Drawing PL302 Rev A in Annex I of **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014].** Further to review of Drawing PL303 Rev B 'Fosse Way - South' in Annex I	The Applicant's view is that the construction route and proposed mitigation measures are suitable to facilitate the Scheme as demonstrated by drawings in Annex L, M and N of **ES Volume 3, Appendix 13-1: Transport Assessment (Part 2) [REP7-060] (Revision 7)** submitted at Deadline 7. The potential impact of construction traffic has been assessed in **ES Volume 1, Chapter 13-1: Transport and Access [REP7-015]** in accordance with the ISEP Guidelines. This confirms there are no significant impacts. Further to ISH6, the Applicant has included further minor widening works identified by Wiltshire Council. The	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		of **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014]**, it is Wiltshire Council's position that the southern section of the Fosse Way requires the provision of four passing places between the bend to the south and the Fosse Lodge junction to the north, with a nominal spacing of circa 175 metres. A further passing place is also required between the passing place at Fosse Lodge (Inset 3) and the next passing place at Inset 4, 380m to the north-east. Further to review of Drawing PL304 Rev B 'Fosse Way - North' in Annex I of **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014]**, looking at the location of the proposed HGV passing place works in Inset 2, the distance SW along Fosse Way to the railway bridge is 570m. As such, further passing places should be provided between these locations. WC also considers there is a lack of any HGV passing opportunity between the Inset 7 and Inset 8, and a further	Applicant will deliver these works via Article 10 of the DCO. The minor widening works include the following: • The requested locations on Fosse Way within the longest lengths of intervisibility. These are shown in Drawings PL310-PL312 in Annex O of **ES Volume 3, Appendix 13-1: Transport Assessment (Part 2) [REP7-060] (Revision 7)** submitted at Deadline 7. • Two locations on Bradfield Cottages. These locations are shown in Drawings PL313 and PL314 in Annex O of **ES Volume 3, Appendix 13-1: Transport Assessment (Part 2) [REP7-060] (Revision 7)** submitted at Deadline 7. It is the applicant's position that the works would not change the conclusions of the ES as: • They are within the public highway.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		passing place should be provided between these locations. Further to review of Drawing PL305 Rev B 'Dyson Roundabout to Bradfield Cottages' in Annex I of **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014]** it is Wiltshire Council's position that 'up front' mitigation works are required to widen the carriageway through the bend (located northeast of the junction with The Street) and along the western edge of the carriageway to the north as far as the field access just south of the railway bridge. It is also considered that localised works are required 'upfront' to provide a midpoint passing place for two HGVs between the access to the Monks Tap and the point to the north where the carriageway has sufficient width for centre line marking. It is noted that kerb/verge over-run damage has occurred at the junction with Brookside and the large concrete apron access to the rear of the Monks Tap to the north, however, these areas can be	• They are within existing grass verge; and • Do not impact on existing trees or hedgerows As secured in the latest **Outline CTMP [REP7-087] (Revision 7)** submitted at Deadline 7, pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to the highway and verges during the construction period. This will also cover the area's highlighted by Wiltshire Council that require monitoring. The final detalis and extent of these surveys will be confirmed as part of the Final CTMP. The Applicant notes Wiltshire's agreed position to the protective provisions provided in Schedule 15, Part 11 of the Draft DCO, which also secures the agreed condition survey, monitoring and highway damage redress regime. This means there are two mechanisms available (both the CTMP and protective provisions) for facilitating the	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		monitored during construction and mitigation works agreed if further damage occurs to kerbing/verges in the vicinity of these accesses. Further to review of Drawing PL309 Rev A 'Fosse Way to Lime Down A' in Annex I of **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014]** it is Wiltshire Council's position that this section of the construction route will be able to accommodate the proposed level of construction traffic without mitigation. It is recommended that this section of the route is monitored using the highway condition surveys and interim action taken during construction if significant additional overrun damage is seen to occur. Following the submission of **ES Volume 3, Appendix 13-1: Transport Assessment** submitted at Deadline 7 the insertion of Annex O is noted which shows details of the additional widening mitigation requested by the Council in Drawings PL310-314. The Applicant further advises that "they will deliver these works via Article 10 of the	necessary road condition surveys and appropriate remediation required.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		DCO". Subject to detailed scrutiny of these drawings and comment at Deadline 8, this will serve to close out outstanding HGV passing place concerns on the narrow rural lanes forming parts of the construction routes. Both parties now agree that that the road width diagrams presented in the Transport Assessment are broadly representative.		
3.9.4b	Assessment Results- Construction Routes	Wiltshire is now content that Article 10 and the LHA protective provisions at Schedule 15, Part 11 of the Draft DCO secure the mechanism for undertaking damage remedial works outside the Order Limits as may be required. The extents of the required Highway Condition surveys and timing is set out in the oCTMP. However, the Council would still prefer a formal Section 59 Highway Agreement which it is considered would carry more weight in ensuring highway damage redress.	The Applicants notes that Article 10 and the LHA protective provisions at Schedule 15, Part 11 of the Draft DCO secure the mechanism for undertaking damage remedial works outside the Order Limits as may be required. The extents of the required Highway Condition surveys and timing is set out in the oCTMP.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.9.5a	Transport Assessment - HGV Volumes – Solar Farm Sites (Construction Phase) / Information to support trip generation calculations	The Applicants final construction trip generation figures are presented in Annex E of **Volume 3, Appendix 13-1: Transport Assessment** submitted at Deadline 7. The parties have reached agreement on the Applicants revised construction trip generation figures for waste packaging, general access tracks, 33kV conversion units and foundations, 132kV substations, 400kV substation, BESS foundations, other BESS components, cabling, landscaping, cable trips, panel numbers, BESS/400kV substation access tracks, 132kV access tracks, compound surfacing, other compound trips, BESS units and BESS power conversion units and loading per HGV possible with 'High Cube' containers (PV Modules). However, the applicant is now assuming the use of High Cube 40ft containers with a higher advised capacity of 720 to deliver all panels needed. The SLD calculation assumes standard containers with a 500 capacity, which was the applicant's	The Applicants final construction trip generation figures are presented in Annex E of **Volume 3, Appendix 13-1: Transport Assessment (Part 2) [REP7-060] (Revision 7)** submitted at Deadline 7. The trip generation for the construction phase has been calculated based on a detailed and realistic breakdown of the likely quantities and material volumes required to build out the various sites and cable routes. The parties have reached agreement on the Applicants revised construction trip generation figures for waste packaging, general access tracks, 33kV conversion units and foundations, 132kV substations, 400kV substation, BESS foundations, other BESS components, cabling, landscaping, cable trips, panel numbers, BESS/400kV substation access tracks, 132kV access tracks, compound surfacing, other compound trips, BESS units and BESS power conversion units and loading per HGV (PV Modules).	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		previous 'worst case' assumption so it is unclear why it should not remain so. As previously noted, it still seems to the Council that it would be prudent in assessing a worst-case outcome to 'at least' assume an availability mix of high cube and normal containers.	The delivery of 720 panels per High Cube 40ft container has been calculated. This has been confirmed by the manufacturer/supplier with evidence provided to SLD. To provide certainty, the requirement to deliver panels by 40ft High Cube container has been included in the **Outline CTMP [REP5-083]** submitted at Deadline 5. The Applicant confirms that 842,500 panels is the highest quantity of panels achievable under any technical design scenario.	
3.9.5b	Transport Assessment - HGV Volumes – Solar Farm Sites (Construction Phase) / Information to support trip generation calculations	The council has concerns over the number of HGVs needed to transport mounting structures and the assumption regarding the off-site disposal of excavated material (only 10%). The number of HGVs needed for mounting structures pre-supposes that circa 1,406 mounting structures can be transported on a single articulated flatbed HGV, a unit load that seems very high and needs further verification. It also needs to be demonstrated that	The Applicant has verified the number of deliveries required for mounting structure with the supplier. The Applicants assumption of off-site disposal of 10% of excavated material is considered robust. The applicant assumed 10% of all excavated soil is taken off site, using the total soil excavated from access tracks, compounds, foundations of substations and BESS. Access tracks excavation will be spread either side of the tracks, excavated compounds will be refilled	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		1406 units including packaging would not exceed the maximum laden weight of a flatbed articulated HGV. The total agreed volume of excavated spoil material has been agreed and is derived directly from the volumes of material used for access roads, compounds, foundations of substations and the BESS. This amounts to 94,589m³ in accordance with the Applicant's Response to SLD's Written Representation. However, it remains unclear to the Council how such a large volume of excavated material will be used on site as advocated by the Applicant with no need for off-site disposal. A 10% allowance for possible disposal off-site does not seem a worst case scenario.	from stockpiles. foundations of substations and the BESS will either be used for the bund or stored on site in stockpiles as specified in the **Outline Soil Resources Management Plan [REP7-079].**	
3.9.6	HGV construction traffic levels assessment	The Council does not agree that HGV increases of 30% at eight locations is not significant and considers that an increase in HGV movements on a narrow, rural road with limited passing opportunities presents a genuine highway safety risk. Without sufficient carriageway width or passing places to	The Applicants notes Wiltshire Council's Response. Please refer to the Applicant's position on construction routes (see Reference 3.9.4 above).	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		allow two articulated HGVs to pass safely, the impact should be treated as significant and requiring mitigation. However, the Applicant has committed to the widening works set out Annex O of **ES Volume 3, Appendix 13-1: Transport Assessment submitted at Deadline 7** (see paragraph 3.9.4). Following this commitment, the Council is satisfied that sufficient mitigation is now provided to allow two articulated vehicles to pass along the proposed construction routes.		
3.9.7	HGV construction traffic levels assessment – Cable Route Corridor	**ES Volume 1, Chapter 13: Transport and Access** notes that most HGVs will be 10 m tipper trucks, with additional abnormal indivisible load (AIL) movements for cable drum deliveries. Wiltshire Council highlights the need for the Transport Assessment to demonstrate that these vehicles can safely pass along the affected minor roads and to clearly identify which roads will be used for AIL access, as	The change in HGV flows will be small in absolute terms at each Cable Route Corridor Access Point (4 HGVs per day, equivalent to one movement per hour for 90 days during construction times). These movement can therefore be accommodated on the existing highway network. Each access has been tracked to demonstrate access for a 10m tipper truck, these are shown in Drawings SK101 to SK128, contained in Annex D of **Volume 3,**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		some may be unsuitable due to width or alignment constraints.	**Appendix 13-1: Transport Assessment (Part 2) [REP7-060] (Revision 7)** submitted at Deadline 7. The Cable Route Corridor Access Routes for AIL vehicles are shown in **ES Volume 2, Figure 13-6: Abnormal Indivisible Load Routes: Cable Route Corridor [REP4-018]**. The swept-path of AIL movements along these routes has been undertaken at key points as presented in Appendix D of the **Outline CTMP [REP7-87] (Revision 7)** submitted at Deadline 7. This demonstrates that the AIL movements can be accommodated at all points where potential constraints have been identified.	
3.9.8	Sensitivity assessment	The Council considers that the sensitivity of construction routes to Lime Down Sites A–C and D–E now considers highway safety and operational impacts as the Applicant has now committed to the widening works set out Annex O of **ES Volume 3, Appendix 13-1: Transport Assessment submitted at Deadline 7** (see paragraph 3.9.4). Following this	The Applicant makes note of this comment. Refer to the Applicants above position on construction routes (Reference 3.9.4).	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		commitment and subject to subsequent review and approval of Drawings PL310-314, the Council concurs that sufficient mitigation is now provided together with the other HIA works to allow two articulated vehicles to pass along the proposed construction routes without undue risk of passage conflicts and subsequent highway safety risk.		
3.9.9	Impact Assessment – Fosse Way	Wiltshire Council did not agree that there will be minor adverse impacts on the Fosse Way. Due to the narrow carriageway and long sections with limited passing meaning the road may not safely accommodate HGVs, including two-way HGV traffic. Additionally, the route from Dyson Roundabout to Bradfield Cottages was also a concern due to high predicted HGV flows and concerns about two-way passage, particularly northwest of the Hullavington crossroads. However, the Applicant has now committed to the widening works set out Annex O of **ES Volume 3, Appendix 13-1: Transport Assessment submitted at Deadline 7**	The Applicant makes note of this comment. Refer to the Applicants above position on construction routes (Reference 3.9.4).	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		(see paragraph 3.9.4). Following this commitment and subject to subsequent review and approval of Drawings PL310-314, the Council concurs that sufficient mitigation is now provided together with the other HIA works to allow two articulated vehicles to pass along the proposed construction routes without undue risk of passage conflicts and subsequent highway safety risk.		
3.9.10	Residual effects (construction)	The ES concludes there are no significant residual transport effects from construction. However, the Council disagreed, noting that minor roads serving Lime Down Sites A–D are often too narrow to accommodate the two-way passage of vehicles. Given the high predicted HGV traffic, particularly to Bradfield Cottages (Site D), the Council considers the risk of HGV conflicts significant. However, the Applicant has now committed to the widening works set out Annex O of **ES Volume 3, Appendix 13-1: Transport**	Refer to the Applicants above position on construction routes (Reference 3.9.4).	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Assessment submitted at Deadline 7 (see paragraph 3.9.4). Following this commitment and subject to subsequent review and approval of Drawings PL310-314, the Council concurs that sufficient mitigation has been provided together with the other HIA works to allow two articulated HGV vehicles to pass along the proposed construction routes without undue risk of passage conflicts and subsequent highway safety risk.		
3.9.11	Significance of effects - operation	During the operation phase, vehicle traffic will be minimal, using permanent accesses created or improved for construction. Adequate hard standing turning areas will be provided within the sites to allow maintenance vehicles to exit in forward gear, which Wiltshire Council considers acceptable.	The Applicant notes Wiltshire's position.	**Agreed**
3.9.12	Draft DCO Provisions	The LHA Protective Provisions in Schedule 15-Part 11 are now agreed. Following ISH9 the Highway Development Management (HDM) concerns with Articles 10, 11, 14 and 15 have been addressed.	The Applicant notes Wiltshire's position and agrees these matters are now resolved.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.9.13	Draft DCO – Article 14	Following ISH9 the Highway Development Management (HDM) concerns with Article 14 have been addressed.	The Applicant notes Wiltshire's position and agrees this matter has now been resolved.	**Agreed**
3.9.14	Street works & Permit Scheme (Articles 8 & 9)	Wiltshire Council considers that the Applicant must obtain permits to carry out any works in the public highway, including installing cables, ducts, or access points. The Council require the following further detail: • the specific works that will be carried out at each highway location. • traffic management measures, including whether road closures or other controls will be required. • access arrangements, including whether new accesses are temporary or permanent and what permissions will be used. • the number and locations of traffic management for large joint bays/pits	Article 8(2) provides the Applicant with a statutory right to carry out street works for the purposes of sections 48(3) and 51(1) of NRSWA. Section 48(3) confirms that, in Part 3 of NRSWA, "undertaker" means a person "by whom the relevant statutory rights is exercisable … or a licensee under a street works licence, as the case may be". Section 51(1) of NRSWA confirms that is an offence to place apparatus in a street unless in pursuance of a statutory rights or a street works licence. Article 8(2) therefore provides the statutory right for the Applicant to lay cabling forming part of the Scheme (being street works) pursuant to a statutory right, and no separate street works licence is required. The details of these works, including traffic management measures and the	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		that may require significant traffic management. • Potential conflicts with existing underground infrastructure, requiring confirmation that surveys have been undertaken. • Construction compounds and vehicle crossovers require clarity and appropriate licensing. • Abnormal loads must follow the council's notification and procedures. • Traffic survey data needs to be clarified and published. • Construction programme and traffic management plans must be shared and approved by the council. • Temporary signage and permits must be approved by the council. • All works must comply with Wiltshire Council's permit scheme and specifications. The Council now accepts that the protective provisions cover all of the	programme, will be agreed at the technical approval/detailed design stage. Road space booking will still be required under the Council's permit scheme, which is applied to street works carried out under the DCO by Article 9. The land plans set out the extent of compulsory acquisition and temporary possession powers required within the Order Limits. The Works Plans should be read in conjunction with Schedule 1 of the draft DCO. The detail of the traffic regulation measures required in each area will be identified post-consent, and these details will be submitted to the relevant highway authority, as required by the CTMP. Clarity on whether an access is temporary, permanent of semi-permanent is provided in Table 13-19 and Table 13-32 in **ES Volume 1, Chapter 13-1: Transport and Access [REP7-015] (Revision 5)** submitted at Deadline 7. Article 14 of the DCO provides for the creation of these	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		above details, including road closures in Articles 8 and 9 of the DCO.	accesses, with any dropped kerb or similar being carried out under article 10 and completed maintained to the satisfaction of the relevant street authority in accordance with article 11. Temporary accesses will be restored to the satisfaction of the street authority under article 10. No separate licence or agreement is required, as the DCO provides the necessary consent for these works, however the design of the accesses will be completed in conjunction with the local highway authority as required by the **Outline CTMP [REP7-087] (Revision 7)** Submitted at Deadline 7. In response to the query included at paragraph 14.13 regarding the potential for joint bays to be located within the highway network, the cable route is defined by the Order Limits of the DCO. The majority of this is within fields and it is therefore extremely unlikely that a joint bay would ever be required beneath the highway. The Order Limits provide enough space for a choice of routing options where it	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			runs along or across the highway network. The normal procedure for AIL deliveries will be followed. This is set out in Section 5.5 of the **Outline CTMP [REP7-087] (Revision 7)** submitted at Deadline 7**.** Traffic counts are included in Annex A of **ES Volume 3, Appendix 13-1: Transport Assessment (Part 1) [REP7-058] (Revision 7)** submitted at Deadline 7. Details as to the location of the construction compounds are provided in the **Land Plans [REP5-005]** and **Works Plans [REP5-006]** under Works Number 5A(v). They are located outside of the Highways extent and will be sited in those locations temporarily for the purpose of construction. All works in private land will be reinstated following completion of the works. Details relating to how the construction areas will be accessed are provided in **ES Volume 1, Chapter 13: Transport and Access [REP7-015] (Revision 5)** submitted at Deadline 7. The design of	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			the access and egress from the highways will be completed in conjunction with the local highway authority as set out within the **Outline CTMP [REP7-087] (Revision 7)** submitted at Deadline 7.The Applicant agrees that these matters have been resolved and the protective provisions with Wiltshire Council are now agreed.	
3.9.14a	Street works & Permit Scheme (Articles 8 & 9)	The Council consider the following matters to be outstanding: • Inspection units must also be agreed between the streetworks team and applicant for the works on the cable route corridor • All reinstatements must adhere to the SROH and this must be reflected in the scheme documents. • If the Applicant comes in with a late booking and a promoter has already pre-booked the road space, The Council requires clarity on who pays the admin costs to the affected promoters	The Applicant has now agreed protective provisions with Wiltshire Council and its position is that these matters are addressed through the protective provisions or the **Outline CTMP [REP7-087]** (and in the case of road condition surveys and the mechanism for remediation for example, it is addressed by both). In respect of the Council's request regarding Article 9 of the **Draft DCO [REP7-007] (Revision 7)**, this has been amended at Deadline 7 to utilise the Expert Determination process for resolving disputes.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• Is the applicant going to use the optional (albeit very helpful from a coordination perspective) Forward Planning Notices for works? It's such a big scheme that one would hope that the Applicant could stick to a project plan and therefore submit Forward Planning Notices. • It is unclear if the Council's request to have Article 9(3) amended or removed has been actioned in the dDCO With regards the inspections of the cable route work (the first item listed above), for similar big projects The Council has been paid to have a dedicated council inspector to manage the inspections to ensure its roads are reinstated to the SROH. It is unclear how the Council will ensure its roads are reinstated to the required standards as set out in the SROH. The council expects that the above items are addressed within the detailed proposals, including the detailed CTMP and through the protective provisions procedures. However, as this is		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		dependent upon future information to be incorporated into the detailed proposals, the council is unable to mark this as agreed.		
3.9.14b	Draft DCO	Further to the discussion at ISH3 and ISH4 and given the Applicant's assertions that all approval / permitting processes are set out and governed through the CTMP, the council considers that the DCO Articles should make explicit reference to the Construction Traffic Management Plan (CTMP). This would provide more clarity on the processes to be followed.	The Applicant notes that the CTMP is secured by Requirement 15 of the **Draft DCO [REP7-007]**, which secures compliance with detailed CTMPs to be approved by the relevant planning authority. It is not considered appropriate or necessary to duplicate this requirement within the articles, and doing so would be contrary to Statutory Instrument Drafting best practice.	**Agreed**
3.9.14c	Draft DCO and CTMP	The statutory Safety at Street Works and Road Works – A Code of Good Practice (October 2013), which is mandatory for all promoters, defines the minimum widths for two-way working (page 53). For normal working traffic that includes buses and HGVs, the minimum is 6.75m. It can only be reduced to 5.5m if it is cars and light two-way traffic only. The council in concerned that a H&S enquiry would utilise the statutory Code of Good	This relates to works undertaken in the highway and maintaining a two-way width. Temporary signals would allow shuttle working for installation of access junctions for example, Shuttle working would require a width or 3.5m running lane. Page 53 of the Red books states 3.25–3.50 m desirable width range 3.0 m absolute minimum for shuttle working.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Practice, therefore the Applicant is required to justify any proposed deviation within the scheme documentation. It is noted the Applicant has referenced the widths for shuttle working, which may be permissible subject to resultant traffic management measures approval.		
3.9.15	Draft DCO	The Council consider that the DCO appears to permanently override existing legislation, and the Council seeks clarification on whether this applies for the full operational life of the development. The draft DCO does not provide for statutory inspection of street works, despite the highway remaining a Council asset that must be reinstated to required standards. While Section 58 protections may cause challenges, they do not prevent works and should be managed through agreed solutions such as full- or half-width reinstatements. The proposed 4-week timescale for Temporary Traffic Regulation Orders	The Planning Act 2008 was enacted as a result of the need for a streamlined consenting regime for infrastructure projects. A key aim of the Planning Act 2008 was to create a 'one stop shop' for all the consents, licences and permits required for a project. The approach to drafting the DCO is extensively precedented, as set out in the **Explanatory Memorandum [REP7-009]**. Article 8 (street works) of the draft DCO provides the Applicant with a statutory right to carry out the street works authorised by the DCO, before expressly applying Part 3 of NRSWA to those street works, save where the	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		(TTROs) is considered unrealistic and contrary to the national 12-week standard, with no flexibility for longer periods. Several provisions in Part 3 conflict with existing legislation and impose unreasonably short timescales for approvals, publicity, and agreements. The council maintains that the four-week period in Article 16(5)(a) is insufficient. Therefore, Wiltshire Council is seeking an eight-week notice period, but suggests the addition of the wording "*unless a shorter period is agreed in writing by the traffic authority*." This is a compromise on the council's standard 12-week period. Wiltshire Council also considers that consent under 16(4)(b) should be expressly carved out from Article 47. The council requests the addition of the following wording as new Article 16(8): "*Article 47 does not apply to any consent required under article 16(4)(b)*." The council maintains that the changes sought above to Article 16 are still	Applicant is also the street authority for the street in question. Article 9 (application of the permit schemes) applies the Councils' Permit Schemes with minor modifications needed to ensure that it does not constitute an impediment to the implementation of the Scheme. This is considered appropriate to ensure that this critical national priority infrastructure can be delivered without delay. The Applicant notes that the Council may still impose conditions on the carrying out of works under the permit scheme, such as the full width and half width reinstatements mentioned; the article merely restricts the ability to require works to not be carried out for a period under sections 58 and 58A of NRSWA. The Council's comments referring to "Part 3(12)" and "Part 3(16)" both appear to relate to article 16 (traffic regulation measures) of the draft DCO. Article 16 requires the Applicant to provide 4 weeks notice before it makes provision for traffic regulation which	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		required, regardless of the agreement of the LHA protective provisions.	has effect as though it were a duly made traffic order. The Applicant is able to make traffic orders for the purposes of the construction, maintenance and decommissioning of the authorised development. This purpose differs from the purposes for which a traffic authority may make temporary traffic regulation orders (TTRO) under section 14 of the Road Traffic Regulation Act 1984 (the 1984 Act). Any TTRO made by the traffic authority may only be for a maximum 18 month period. Including this power within the DCO ensures that necessary traffic regulation can be put in place for the needed duration without placing any additional burden on Council resources, whilst also avoiding any concern that traffic order made by the traffic authority for the purposes of the authorised development would not comply with the purposes listed in section 14 of the 1984 Act. The Council's usual timeframe for making TTROs is therefore not relevant as it is the Applicant that will be making the traffic regulations.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Wiltshire Council and the Applicant have now agreed protective provisions for the benefit of Wiltshire Council as local highway authority that will provide an additional layer of oversight in respect of traffic management for the local highway network.	
3.9.16	Works Plans [APP-007]	The submitted Works Plans only include highway improvements for Works Numbers 8A and 8B, leaving other minor roads used to access Lime Down Sites A-D without scope for any highway mitigation measures under the DCO, despite significantly increased HGV traffic during the construction phase. However, the Applicant has now committed to the widening works set out Annex O of **ES Volume 3, Appendix 13-1: Transport Assessment submitted at Deadline 7** (see paragraph 3.9.4). Following this commitment and subject to subsequent review and approval of Drawings	The Applicant confirms that the Works Plan will remain unchanged. The Applicants notes the Council's latest position. see the Applicants above position relating to construction routes (Reference 3.9.4).	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		PL310-314, the Council concurs that sufficient mitigation has been provided together with the other HIA works to allow two articulated HGV vehicles to pass along the proposed construction routes without undue risk of passage conflicts and subsequent highway safety risk. It is also noted that the widening works set out in Drawings PL310-314 can be carried out using Article 10 provisions in the dDCO to roads outside of the Order Limits, and so not just the areas defined as Works Numbers 8A and 8B.		
3.9.17	Streets Plans [APP-008]	The sections of highway highlighted in the draft DCO correspond only to Works Numbers 8A or 8B, meaning the DCO currently does not allow for wider highway improvements. However, the Applicant has now committed to the widening works set out Annex O of **ES Volume 3, Appendix 13-1: Transport Assessment submitted at Deadline 7** (see paragraph 3.9.4). Following this commitment and subject to subsequent review and approval of Drawings	The Applicant confirms that the Streets Plan will remain unchanged. The Applicants notes the Council's latest position. See the Applicants above position relating to construction routes (Reference 3.9.4).	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		PL310-314, the Council concurs that sufficient mitigation is now provided together with the other HIA works to allow two articulated HGV vehicles to pass along the proposed construction routes without undue risk of passage conflicts and subsequent highway safety risk. It is also noted that the widening works set out in Drawings PL310-314 can be carried out using Article 10 provisions in the dDCO to roads outside of the Order Limits, and so not just the areas defined as Works Numbers 8A and 8B.		
3.9.18	Access points for construction works	The Council supports the proposed construction route into Lime Down Site E, which is via a new access Location 18 on the A429 south of Corston. An additional access in the same location (Location 10) serves the cable route area between the A429 and Lime Down D.	The Applicant notes this position.	**Agreed**
3.9.19	Alternative construction routes to Lime Down Sites A-C	ES figures assess alternative construction routes to Lime Down Sites A–C. While the route via the M4, A46, B4040, B4039, Fosse Way is agreed to	See above position relating to construction routes (Reference 3.9.4).	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		be the best option, Highway Improvement Areas are only identified in four locations, mostly far south of the Lime Down sites. The Council is concerned that the unnamed road between Fosse Way and Sherston (serving Site A) is excluded, as well as Fosse Way, leaving uncertainty about whether either of these minor roads will be adequate for accommodating two-way HGV traffic without mitigation. Both parties agree that no further mitigation is required above what is proposed in the Outline CTMP on the route to Lime Down A from the top of Fosse Way.		
3.9.20	Access route to Site E	Wiltshire Council supports the revised the access route to Site E which removes the use of Grange Lane and Rodbourne Road and instead takes direct access from the A429 via a new access south of Corston, as the minor roads are unsuitable for regular articulated HGV traffic.	The Applicant notes this position.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.9.21	Draft DCO Order - Road Safety Audit	The Council considers a Stage 1 Road Safety Audit for access junctions, to be insufficient. The council seeks mandatory submission and approval of detailed design and construction drawings, supported by a Stage 2 Road Safety Audit, in line with normal requirements under a section 278 agreement. It is agreed this is now provided by the agreed Protective Provisions in Schedule 15-Part 11 to the dDCO.	The Council's normal requirements in relation to access points is noted. Section 2.3 of **the Outline CTMP [REP7-087]** submitted at deadline 7 includes the requirement for a Stage 1 and Stage 2 Road Safety Audit. This is also covered in the agreed Protective Provisions in Schedule 15 - Part 11 of the **Draft DCO [REP7-007].**	**Agreed**
3.9.22	Preliminary access drawings	The Council are concerned that Article 14 appears to treat all accesses in Schedule 7 as approved in principle, despite the drawings being only indicative. This is considered unacceptable, as full technical details (required under a section 278 agreement) have not been provided. It is agreed this detailed design requirement for the accesses listed in Schedule 7 is now provided by the agreed Protective Provisions in Schedule 15-Part 11 to the dDCO.	See the Applicants above position relating to Draft DCO Provisions (Reference 3.9.12), the Draft DCO (Reference 3.9.13) and 3.9.15 and Street Works (Reference 3.9.14).	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.9.23	Preliminary access drawings – Cable Route Corridor	The Council considers deemed consent under Article 14 unacceptable and considers that the DCO should include a requirement for full submission and approval of temporary access designs by Wiltshire Council's Network Management team. It is agreed this detailed design requirement for the accesses listed in Schedule 7 is now provided by the agreed Protective Provisions in Schedule 15-Part 11 to the dDCO.	See the Applicants above position relating to Draft DCO Provisions (Reference 3.9.12), the Draft DCO (Reference 3.9.13) and 3.9.15 and Street Works (Reference 3.9.14).	**Agreed**
3.9.24	Draft DCO – Articles 10, 11 and 14	The Consents and Agreements Position Statement notes that most highway consents are addressed in the Draft DCO (Articles 10, 11, 14). However, the Council is concerned that this effectively gives deemed consent for access works even when design details are absent, and there is no requirement for technical approval by Wiltshire Council, leaving the Council unable to ensure works meet adoptable standards. The agreement of the LHA Protective Provisions in Schedule 15-Part 11 now	See the Applicants above position relating to Draft DCO Provisions (Reference 3.9.12), the Draft DCO (Reference 3.9.13) and 3.9.15 and Street Works (Reference 3.9.14).	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		alleviates HDM concerns with the specific clause wording in Articles 10, 11 and 14.		
3.9.25	Outline Construction Traffic Management Plan	The Council suggests it may be preferable to have separate CTMPs for different Lime Down Sites, unless sites share construction routes or concurrent works. Section 2.3 of the Outline Construction Traffic Management Plan requires detailed design submissions to the highway authority, which his welcomed however, the Council notes it does not replace the need for formal highway agreements under Article 15 of the draft DCO.	The **Outline CTMP [REP7-087] (Revision 7)** submitted at Deadline 7 specifies an option for separate Final Construction Traffic Management Plans to be prepared for each Lime Down Solar PV Site and the Cable Route Corridor. In regard to Section 2.3, see the Applicants above position relating to Draft DCO Provisions (Reference 3.9.12), the Draft DCO (Reference 3.9.13) and 3.9.15 and Street Works (Reference 3.9.14).	**Agreed**

3.10 Noise and Vibration

Table 3-10: Noise and Vibration

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.10.1	Legislation and Policy	Wiltshire Council provided no comment on legislation and policy	The Applicant considers that **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]** has identified and appropriately considered all applicable legislation and policy.	**Agreed**
3.10.2	Methodology	The methodology and LOAEL and SOAEL are broadly appropriate, although contextual reasoning around noise is required.	The methodology adopted within **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]** has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable. An extra paragraph on the local soundscape and context has been added to Section 14.10 of the ES chapter.	**Agreed**
3.10.3	Baseline	Wiltshire Council provided no comment on the baseline used for assessment.	The baseline conditions which are detailed in **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]** are representative of the baseline sound environment in the study area.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.10.4	Assessment Results	Wiltshire Council notes that Table 8 of Appendix 14-4 Noise Modelling [APP-237] shows that there is one receptor (R10) that has been classed as SOAEL* (+5dB above the background LA90) for daytime operational noise. BS 4142:2014 states that a difference of +5 dB is likely to be an indication of an adverse impact. However, Table 14-23 Operational Noise Results Summary states that no daytime receptors are above SOAEL. This is a significant discrepancy and as a result, the council requires the following for R10: A breakdown of each operational noise source i.e. conversion units, solar PV panels (tracking structures), transformers and battery inverters that contributes towards daytime noise levels; A BS4142 rating calculation; and Additional analysis setting out proposed mitigation in order to ensure daytime levels fall <5dB.	Calculated levels at R10 are less than 5 dB above the background and not above SOAEL. However, when rounded to the nearest decibel, they are 5 dB above background and at the SOAEL, as reported in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [REP5-063]**. The Applicant accepts that this could appear as a discrepancy and has provided a breakdown of the daytime operational noise sources at R10 in their response to the relevant representation. This demonstrates that the central BESS area is the dominant noise source at R10. Additional analysis indicates that a level below SOAEL, even when rounded, could be achieved with 85% of the BESS containers being fitted with air-cooled heat exchangers (as opposed to the 75% reported in the ES). This would bring the contribution of the BESS containers in the table below to less than 27 dB and the rating level in the right-hand column down to 34 dB.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			While the Applicant is not committing to this mitigation explicitly, to maintain design flexibility, the **Outline OEMP [REP7-075]** has been amended to clarify that levels at all receptors from the final design would be below SOAEL. Following the submission of a revision of **ES Volume 3, Appendix 14-4 Noise Modelling [REP5-063]**, to correctly reflect the baseline levels derived in **ES Volume 3, Appendix 14-3: Baseline Noise Survey [REP6-016]**, levels at R10 are only 1 dB above background (4 dB below SOAEL). The commitment to the rating level in the **Outline OEMP [REP7-075]** at R10 remains the same.	
3.10.5	Mitigation / Management Plans – communication strategy	Wiltshire Council request that as part of the communication strategy, residential dwellings on Silver Street must be informed of dates, times and duration of any construction activities taking place in the vicinity of their residence. Table 8 [APP-277] should therefore be	The **Outline CEMP [REP7-073]** has been updated to clarify that: *"The detailed CEMP(s) will also set out a scheme for the provision of monthly reporting information to and from local residents to advise of potential noisy works that are due to take place and for monitoring of noise complaints and*	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		amended to include this as a specific measure.	*reporting to the Applicant for immediate investigation and action. Such a scheme would include informing residents in locations identified in Chapter 14: Noise and Vibration of the ES, such as those on Silver Street, of the dates, times and duration of construction activities in their vicinity."*	
3.10.6	Mitigation / Management Plans – Temporary Acoustic fencing	Table 8 of the oCEMP [APP-277] states that "depending on the location, plant and timing of works, temporary acoustic fencing will be installed around the HDD site boundary to screen receptors from noise emission". This negatively worded commitment should be amended to one that is positively worded, for example - 'Temporary acoustic fencing provides up to 10dB of attenuation. Temporary acoustic fencing will be installed around the HDD boundary to screen those receptors identified as having an 'above SOAEL' effect level as set out in Table 14-20 HDD Locations and Receptors of the Noise and Vibration Assessment (Chapter 14 of the ES)'.	The **Outline CEMP [REP7-073]** has been updated to adopt this approach: "Temporary acoustic fencing will be installed around the HDD boundary to screen those receptors identified as having an 'above SOAEL' effect level as set out in Table 14-20 of **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]**."	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.10.7	Mitigation / Management Plans -BESS	Table 8 of the oOEMP [APP-278] does not provide the required level of precision necessary to ensure that the required level of mitigation is secured via Requirement 14 of the draft Order because it does not specify the % or number of silencer units for BESS containers, BESS inverters or Conversion units, nor does it specify that all 132kv and 400kv substation transformers will be housed in enclosures. As such, no firm commitments are given in relation to minimum mitigation requirements. By not committing to specific mitigation and actions, it will not be possible for the council to identify whether the necessary mitigation required to protect amenity has been installed. The council accepts the Applicant's addition to the Outline CEMP and considers that this will resolve the concern.	The Applicant is purposefully not committing to specific plant mitigation to provide flexibility in the final design. As discussed with Wiltshire Council on the 20 February 2026, the **Outline CEMP [REP7-073]** has been updated to clarify this point and provide assurance that updated calculations will be provided to the council: *"The Applicant commits that noise at sensitive receptors will be no higher than the levels presented in Section 14.10 of Chapter 14: Noise and Vibration of the ES [EN010168/APP/6.1] and these levels will be set out in the detailed OEMP. The Applicant will remodel operational noise from the Scheme with respect to the final design, including required plant mitigation, to demonstrate that there would be no significant operational noise effects arising from the Scheme as built. The results of this remodelling, including details of the final plant mitigation measures, will be submitted to the relevant local authority."*	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.10.8	Mitigation / Management Plans	The council considers that the commitment to submit noise monitoring results does not go far enough. No details are provided concerning: a) where the monitoring will be undertaken b) timescales concerning the location and frequency of monitoring c) how frequently the monitoring data will be submitted to the local authority d) the timescales the developer will undertake further maintenance or mitigation when the review indicates plant noise levels have exceeded acceptable levels as identified in the ES. The OEMP will need to include a map/plan showing precise locations of the proposed monitoring locations close to the BESS units. Each monitoring location must have a maximum noise threshold (in accordance with noise levels predicted by the noise modelling software used in	The **Outline CEMP [REP7-073]** has been updated to address these concerns and provide some further detail as follows: *"Site staff will carry out annual monitoring and maintenance of equipment as close as practicable to the BESS units, inverters, conversion units and transformers.* *The monitoring, which will take place during the summer when cooling fans are likely to be at their loudest, will include identifying any changes in sound pitches or volume early and carrying out the relevant maintenance. This ensures that plant noise at sensitive receptors throughout the operational lifetime of the Scheme is not materially worse than the levels presented in the ES.* *The results of such monitoring will be submitted to the relevant planning authority for review within 4 weeks of the survey. Where this review indicates plant noise levels generated by the Scheme have materially increased, the report to the local authority will include*	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the ES) which, if exceeded, will trigger corrective actions to resolve the issue. The council accepts the Applicant's addition to the Outline CEMP and OEMP and considers that this will resolve the concern.	*an action plan and appropriate timescales for resolving the issue. The undertaker and relevant planning authority will then liaise in respect of any further maintenance or mitigation required to reduce levels at receptors back to those presented in the ES.* *In the case of third-party complaints about noise correction actions will be taken by the Environment Manager and recorded as outlined in Section 6.2.* *Further details are to be confirmed in the detailed OEMP(s)."* The detailed OEMP will include a plan showing the locations of the monitoring around the central BESS area together with maximum noise thresholds, to be determined at the detailed design stage, once the remodelling, described in response to 3.10.7 above, has been completed. Such monitoring is likely to take place to the north, east and west of the central BESS area to capture to noise in the direction of the closest residential properties, and the noise thresholds will be designed to avoid	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			significant effects at residential receptors, as discussed in 3.10.4.	

3.11 Air Quality

Table 3-11: Air Quality

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.11.1	Legislation and Policy	Wiltshire Council provided no comment on legislation and policy.	The Applicant considers that **ES Volume 1, Chapter 15: Air Quality [REP2-008]** has identified and appropriately considered all applicable legislation and policy.	**Agreed**
3.11.2	Methodology	Wiltshire Council provided no comment on the methodology used for the assessment.	The methodology adopted within **ES Volume 1, Chapter 15: Air Quality [REP2-008]** has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable.	**Agreed**
3.11.3	Baseline	Wiltshire Council provided no comment on the baseline presented.	The baseline conditions which are detailed in **ES Volume 1, Chapter 15: Air Quality [REP2-008]** are representative of the baseline site conditions.	**Agreed**
3.11.4	Assessment Results	The ES Chapter 15 Air Quality [APP-067] report confirms that with the oCEMP in place, the effects arising from the operation and maintenance of	The assessment results set out within **ES Volume 1, Chapter 15: Air Quality [REP2-008]**, including likely significant effects anticipated, are acceptable.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the Scheme are likely to be not significant.		
3.11.5	Mitigation / Management Plans	The council consider that the mitigation set out in the oCEMP, is broadly satisfactory for the purposes of controlling unacceptable air quality impacts associated with the construction and demolition phases of the development.	The proposed mitigation measures set out within **ES Volume 1, Chapter 15: Air Quality [REP2-008]**, and secured within Section 3.10 of the **Outline CEMP [REP7-073] , Outline CTMP [REP7-087], Outline BSMP [REP7-085], Outline OEMP [REP7-075] and Outline Decommissioning Strategy REP7-077]** referenced in Schedule 2 of the **Draft DCO [REP7-007]** are considered acceptable.	**Agreed**

3.12 Socio-Economic Tourism Recreation

Table 3-12: Socio-Economic Tourism Recreation

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.12.1	Legislation and Policy	Wiltshire Council considers that relevant planning policy has been adequately considered as part of the application.	The Applicant considers that **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [REP7-017] (Revision 2)** and its supporting **Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [REP7-062] (Revision 2)** has identified and appropriately considered all applicable legislation and policy.	**Agreed**
3.12.2	Methodology	The Council agree with the methodology used to predict employment numbers during the construction phase and are pleased to note the comprehensive Outline Skills, Supply Chain and Employment Plan (7.20) [APP-285] which if implemented in full, will help to achieve the local employment figures stated. We have some concerns over the number of jobs that will be taken by local	The methodology adopted within **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [REP7-017] (Revision 2)** has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable. The Applicant confirms that the **Outline SSCEP [REP3-104]** is secured by	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		residents will not be as many as indicated by the applicant due to the low level of unemployment locally.	Requirement 18 of Schedule 2 to the **Draft DCO [REP7-007]**. This includes the requirement for a detailed plan to be submitted to and approved by Wiltshire Council, ensuring that measures to support local employment can be considered and approved in detail ahead of construction commencing.	
3.12.3	Baseline	Wiltshire Council provided no comment on the baseline presented.	The baseline conditions which are detailed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [REP7-017] (Revision 2)** and its supporting **ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [REP7-062] (Revision 2)** are representative of the baseline site conditions.	**Agreed**
3.12.4	Assessment Results	The Council consider that the main positive economic impact of the scheme will be during the two-year construction of the solar park, followed approximately thirty years later by the	The assessment results set out within **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [REP7-017] (Revision 2)**, and the supporting **Volume 3, Appendix 16-2 Tourism and Recreation Receptor**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		decommissioning of the original solar panels and the installation of new ones. Wilshire Council confirm the Applicant's assessment on the impact on tourism in the area is comprehensive and identifies all the tourist sites, rights of way, recreational areas and conservation areas that could be impacted.	**Tables [APP-241]** comprehensively set out the likely impacts to identified receptors likely to be affected by the Scheme.	
3.12.5	Mitigation / Management Plans	Wiltshire Council is concerned that whilst the scheme's construction phase offers short-term GVA uplift and jobs, it will result in the loss of up to 20 FTE agricultural jobs and 50 FTE tourism jobs. There will be a reduction in tourism spending of at least £1.76m per year during construction. The long-term adverse impact on leisure and tourism businesses is contrary to Wiltshire's economic strategy. A mitigation plan is required for local businesses as well as clarity on tenanted farm viability. Following further representations from businesses and Stop Lime Down Wiltshire Council has significant	The proposed mitigation measures set out within **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [REP7-017] (Revision 2)**, are considered acceptable, and secured within: • Section 3.11 of the **Outline CEMP (OCEMP) [REP7-073]**; • Section 3.11 of the **Outline OEMP (OEMP) [REP7-075REP7-075]**; • Section 3.11 of the **Outline Decommissioning Statement [REP7-077]**; • The **Outline PRoWPPMP [REP1-104]**;	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		concerns on the potential negative economic consequences to businesses within 5km of the scheme, particularly in the hospitality and equine sector, despite the mitigation measures the Applicant is proposing to put in place. We do not feel that the projected job losses identified by the applicant for tourism take into account potential job losses in the equine sector.	• The **Outline LEMP [REP7-081]**; • The **Outline SSCEP [REP3-104]**; and • The **Outline CTMP [REP7-087]**. These measures are secured by Requirements 13, 14, 20, 16, 7, 18, and 15 respectively in Schedule 2 to the **Draft DCO [REP7-007]**. Where losses to agriculture and tourism employment have been identified, these are worst-case estimates based on likely significant effects from the Scheme, and do not include for additional mitigation measures being applied. The Applicant does not however agree that this effect on tourism employment is significant, accounting for approximately 0.17% of tourism employment and less than 0.15% of the value of the combined tourism industry in Wiltshire (29,000 jobs, £1.2 billion estimated from Visit Wiltshire, 2021). This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			as soon as construction works are complete. Additional mitigation measures through the **Outline SSCEP [REP3-104]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in agriculture or tourism-dependent industries. The Applicant seeks to clarify that the measures in the **Outline SSCEP [REP3-104]** are intended to be implemented throughout construction and the operational lifetime of the Scheme to support ongoing skills and employment opportunities. The Applicant understands Wiltshire Council's position that adverse effects to local business operating within the agriculture, equine and tourism are significant is based on the perceived effect to individual businesses. The Applicant's position is based on looking at employment and economic impacts to business sectors over an assessment area. The Applicant does not therefore believe a further	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			mitigation plan is required for local businesses, as it considers the mitigation measures set out in the **Outline SSCEP [REP3-104]** are applicable to all affected businesses. The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re employment as supported by the measures secured in the **Outline SSCEP [REP3-104]**. The Applicant has been in discussions with landowners and these discussions have included arrangements regarding existing tenancies, excluding any subletting arrangements. Whilst a worst case could involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent be granted. These will be secured either by direct voluntary arrangement between the respective	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			parties and the Applicant, or through the measures secured in the **Outline SSCEP [REP3-104]** by Requirement 18 in Schedule 2 to the **Draft DCO [REP7-007]**. The Applicant has submitted the **Equine Business Report (Revision 2) [REP7-111]** which has identified the size and likely impacts to the equine sector, both in respect of direct impacts to equine businesses, and indirectly to the wider supporting service industry. This report has also set out the mitigation measures that the Applicant has committed to. The Applicant furthermore confirms it has submitted the **Technical Note on Impacts to Non-Equine Businesses [REP5-111]** which identifies the sizes of business sectors with 5 km of the Scheme, the mitigation measures that the Applicant has committed to so that impacts on businesses (including equine businesses) are minimised (including the role and extent of the Community Liaison Group), and demonstrates what additional measures have been secured during the examination	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			process to address concerns raised by Wiltshire Council and Interested Parties on business and economic effects.	
3.12.6a	Mitigation – Public Rights of Way and access	Wiltshire Council request that the Project should: Sign and waymark all Public Rights of Way through the development. Provide a point of contact for Wiltshire's Countryside Access Team, updating details within 14 days if changes occur. Consider holding biannual meetings to discuss access and monitor permissive paths, potentially including user groups and Parish Councillors, particularly during construction and the early years of the scheme.	The Applicant is able to commit to improvements or enhancements to PRoWs inside the Order Limits, where those improvements or enhancements would help to mitigate or offset adverse effects on PRoW use as a result of the Scheme. Any financial contribution to PRoW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process. Provision of signage and waymarkers for PRoWs can be secured through the detailed design stage by Requirement 5 in Schedule 2 to the **Draft DCO [REP7-007]**. General issues and interactions with the Scheme will be headed by the community liaison group, as secured by Requirement 4 in Schedule 2 to the **Draft DCO [REP7-007]**. Key contact details for leading group members, or	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			specifically the Community Liaison Manager during construction, peak replacement works, and decommissioning, can be shared with Wiltshire's Countryside Access Team. These details would also be available to Parish Council's and key local stakeholder groups.	
3.12.6b	Mitigation – Public Rights of Way and access	Upgrade existing ditch crossings to a minimum width of 1.2 m, using culverts where possible to improve safety, accessibility, and reduce failures of bridges.	Where Wiltshire Council PRoW team have recommended improvements to ditch crossings that would require widening of existing crossings, or providing new culverts, these would be undertaken only where there are safety concerns, and where improvement measures align with the Applicant's approach to watercourses, the Scheme's drainage strategy and ecological mitigation. The Applicant is however happy for further improvements to be undertaken by Wiltshire Council's PRoW team and contractors, and is able to commit to funding this through the proposed 'ringfenced' financial contribution in the Community Benefit Fund.	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.12.7a	Mitigation - Public Rights of Way	Wiltshire Council is concerned that the development will increase pressure on existing Public Rights of Way (PRoW) as the public seeks to avoid walking among panels. To mitigate this, the Council requests an annual, index-linked (Retail Price Index) contribution of £20,000 for PRoW improvement and enhancement.	The Applicant is able to commit to an annual, index-linked contribution of £20,000 for PRoW improvement and enhancement	**Agreed**
3.12.7b	Mitigation - Public Rights of Way	Wiltshire Council's position is that an annual, index-linked (Retail Price Index) contribution of £20,000 for PRoW improvement and enhancement should be secured via a section 111 agreement.	The Applicant agrees that PRoW improvement and enhancement funding through a section 111 agreement, and has noted to Wiltshire Council that this come out of the total amount proposed for the Community Benefit Fund.	**Agreed**
3.12.8	Mitigation - PRoW General Principles	Wiltshire Council request that all stiles should be removed from within the red line boundary. Any structures that are required for the control of livestock should be the least restrictive option for all structures and gaps will need to comply with BS 5709:2018. Maintenance will need to be planned to make sure that the structures remain compliant with BS 5709:2018.	The Applicant is able to commit to the removal of stiles within the Order Limits to enhance network connectivity. Features on the boundaries of the Order Limits, or on the boundaries of land under freehold acquisition by the Applicant may require gates compliant with BS 5709:2018 ,as neighbouring land may be reserved for grazing.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		All structures (both existing and new) within the red line will need to be authorised by the highway authority. They will need to be either included within the definitive statement for the path, or they will need to have a 147 authorisation under the Highways Act 1980. If the structure is required to safeguard the public, then these will need to be authorised under section 66 of the Highways Act 1980.	Maintenance of PRoW furniture and water crossings within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **Outline PRoWPPMP [REP1-104]** by Requirement 16 in Schedule 2 to the **Draft DCO [REP7-007]**. All additional or altered structures along PRoW will be set out at the detailed design stage to be approved by the highway authority, in compliance with the relevant section of the Highways Act 1980.	
3.12.9	PRoW Network Improvements	Following a survey of all the Public Rights of Way within 4 kilometres of Lime Down Sites A, B, C, D and E, the Council will suggest improvements and funding applications will be submitted to the scheme's Community Benefit Fund in addition to the requested index linked £20,000 per annum. The council considers that priority should be given towards funding improvements to the Public Rights of Way network which are in close proximity to the site.	The Applicant is able to commit to improvements or enhancements to PRoWs inside the Order Limits, where those improvements or enhancements would help to mitigate or offset adverse effects on PRoW use as a result of the Scheme. The Applicant will continue engagement with WC's PRoW team to agree the full list of locations that the Applicant can commit to through the	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			DCO process or under the requested index linked £20,000 per annum. Any financial contribution to PRoW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.	
3.12.10	Affected PRoW and impacts on recreational use	The Council considers that a considerable amount of work is needed particularly with the PRoW's affected within the solar park, to ensure that the ability of local residents and other uses of these PRoW's to enjoy the full benefits that are currently available continue if this project is consented. The council considers that the mitigation measures included within the management plans are sufficient to ensure access throughout the various phases of the scheme.	The Applicant has assessed the likely effects on the PRoW network as a result of the Scheme in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [REP7-017] (Revision 2)**, with individual PRoWs assessed in the supporting **ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. This has included all PRoWs likely to be affected by the Scheme from the Solar PV Array Sites to those along the Cable Connection Corridor. Although the final Grid Connection Cable route is yet to be finalised, the Applicant has assessed a worst-case scenario where all PRoWs within the Cable Route Corridor are assessed as if the cable may cross them. This has	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			been done to ensure the assessment findings are as robust as feasible. The Applicant understands that maintaining functional and beneficial access to PRoWs is extremely important to local people, and has committed to the mitigation measures in the **Outline CEMP [REP7-073]**, **Outline OEMP [REP7-075]**, **Outline CTMP [REP7-087]**, and **Outline PRoWPPMP [REP1-104]** (each secured by requirement in Schedule 2 to the **Draft DCO [REP7-007]**) to ensure PRoW access and use is maintained as much as possible during construction, and consistently throughout the operational phase of the Scheme.	
3.12.11	Draft DCO and Control Document Considerations	The Applicant should commit to engagement with Wiltshire Council's Economic Development Team to develop a plan to mitigate the impact on local business, focused on tourism, leisure, hospitality, equine and retail sectors. Venues that provide a community service, for example village halls, should also be included in this	The Applicant is committed to engagement with the Economic Development Team through the process of agreeing a Statement of Common Ground with Wiltshire Council. The Applicant is happy to use this process to discuss proposed	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		scheme. This will include a requirement that the applicant should pay compensation to businesses that are able to demonstrate a reduction in income of greater than 30% in a three month period compared to a base year – the year prior to the works taking place - during the construction and decommissioning periods and one following year once these works have been completed. The Applicant should also be required to conduct research on any tenanted farms that will lose land to see if these businesses will be able to continue. The applicant should be required to install a visitor centre on the site explaining the benefits of all forms of renewable energy for the benefit of the community, visitors to the area and for educational purposes.	mitigation measures for local businesses. The DCO contains means by which compensation may be available to persons directly impacted by the exercising of powers in the DCO. However, the Applicant does not consider the requirement for compensation to be paid to businesses indirectly affected by the Scheme to be proportionate or directly measurable, particularly in the presence of other non-controllable or macro-economic factors which may influence year-on-year income to tourism, leisure and retail businesses. The Applicant will continue to discuss if additional mitigation measures to protect local businesses can be secured through the DCO, or if there is sufficient precedence for such a compensation scheme for business based on other DCOs being granted. Estimates for losses to agricultural employment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [REP7-017] (Revision 2)** were based on a reasonable worst-case scenario	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			that the nine affected farm businesses covered by the Solar PV and BESS Sites (Lime Down A-E) would each lose 1.5 full-time equivalent workers, while a further 1.5 times multiplier was used to estimate indirect employment impacts to suppliers or downstream processors. The Applicant is confident that this assumption covers where owner-occupier farm businesses are diversifying intentionally and where tenant farm businesses would be required to cease or relocate. A separate report was not published at the discretion of the Applicant at DCO submission to protect farm business owner interests. The Applicant has been in discussions with landowners covering arrangements regarding existing tenancies, excluding any subletting arrangements. Whilst a worst case could involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent be granted. These will be secured either by direct voluntary	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			arrangement between the respective parties and the Applicant, or through the measures secured in the **Outline SSCEP [REP3-104]** by Requirement 18 in Schedule 2 to the **Draft DCO [REP7-007]**. The Applicant considers engagement between local people, visitors, and the benefits of renewable energy production may be worth exploring with Wiltshire Council, based on where there is local stakeholder enthusiasm to do so. However, the Applicant does not agree that DCO Requirements is an appropriate means to do so, and instead would look to delivery through the Community Benefit Fund (if more widely requested by local stakeholders). For the avoidance of doubt, the Applicant would not be seeking to build a premises or "centre", but would seek the use of local facilities where required. The Applicant is able to discuss these matters further through dialogue with Wiltshire Council.	
3.12.12a	Potential impact of the Scheme	Wiltshire Council requests that the Applicant should facilitate feedback	The Applicant has committed to engagement with external stakeholders	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
	on local businesses	from local business groups such as the Federation of Small Business and the Chambers of Commerce on the impact of the scheme on local businesses. To clarify, this should take the form of an annual survey for a pre-determined number of years once construction has started to determine the economic impact of the scheme, to help inform future projects of this nature. The applicant should be required to do an economic impact report on the equine sector which is a significant contributor to the local economy. Whilst we appreciate the mitigation measures that are being implemented by the applicant, following further written and oral submissions we do not feel the applicant has understood the consequences of a likely loss of confidence in horse owners that place their horses in stud or livery facilities within the area surveyed by the applicant, potentially with severe consequences for the economic viability of these businesses. We are	through the **Outline SSCEP [REP3-104]**, which may include local business groups such as the Federation of Small Business, the Chambers of Commerce, and Swindon and Wiltshire Business and Growth Unit, recognising that this is not an exhaustive list. The Applicant has therefore committed to engagement with Wiltshire ERT and Swindon and Wiltshire Business and Growth Unit during the production of the final SSCEP, as required by Requirement 18 in Schedule 2 to the **Draft DCO [REP7-007]**. The Applicant confirms that local business owners and operators would be eligible to join the Community Liaison Group (the **Outline Terms of Reference [REP7-133]** for which were submitted at Deadline 7), and would be recipients of correspondence under the proposed Stakeholder Communication Plan. The Applicant does not consider that a requirement for it to undertake further annual survey during construction to determine the economic impact of the Scheme is proportionate, nor required to mitigate the effects of the Scheme.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		also concerned that during the construction phase business insurance will either cost substantially more or possibly not be available.	In response to Wiltshire Council's request, and by the Examining Authority within their **First Written Questions [PD-010]**, the Applicant has submitted its **Equine Business Report [REP7-111]** at Deadline 5, and updated at Deadline 7.This has provided a specific equine health and economic assessment of the local equine business sector, to supplement **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [REP7-017] (Revision 2)** which has assessed the economic and recreational impacts of the Scheme on equestrian receptors. The Applicant is committed to ensuring impacts on equestrian facilities can be mitigated wherever practicable, as secured through the measures in the **Outline CEMP [REP7-073]**, **Outline OEMP [REP7-075]**, **Outline CTMP [REP7-087]**, and **Outline PRoWPPMP [REP1-104]**, each secured by requirement in Schedule 2 to the **Draft DCO [REP7-007]**. Through these mitigation measures, the Applicant is confident that environmental effects	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			and suitable communication with equine business owners ahead of and throughout construction. The Applicant therefore considers this will allow equine business operators to be confident that impacts to the environment that horses under their care are kept within can be minimised, and that this is suitable to allow for onward confidence to be shared with their clientele.	
3.12.12b	Potential impact of the Scheme on local businesses	We have taken into account the measures the applicant has put in place to try to reduce accidents between horse riders and other members of the public using the highways network and PRoW's. In an effort to ensure events are correctly recalled in the event of an accident between any vehicle associated with the project and a member of the public cameras are installed and used within 5km of the scheme, along with speed tracking devices. This should also help prevent vexatious claims.	The Applicant confirms that following Issue Specific Hearing 8, the **Outline CTMP [REP7-087]** has been updated to set out that HGV operators servicing the construction works will be required, where practicable and appropriate to the contract, to operate in accordance with the Fleet Operator Recognition Scheme (FORS) and the Construction Logistics and Community Safety (CLOCS) Standard.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.12.13	Setup of an Innovation Forum	In order to adhere to good practice and guidance throughout the time of operation, it is suggested that an Innovation Forum is set up, with an opportunity to enable flexibility over the scheme's lifetime and the ability to evolve with new innovations and best practice. It is also suggested that recycling is a topic that an Innovation Forum could cover. **[REP2-048]** The council are looking for some kind of reassurance of how innovations (if applicable) will flow into the Lime Down Solar Park scheme, especially where new innovations will help to mitigate the identified impacts on the community and the environment, and also to monitor the impacts and whether the mitigation and DCO Requirements are having the desired effect. An Innovation Forum could consist of meetings between the developer / manager of the Scheme and a community and council representative. The Innovation Forum should have a Terms of Reference detailing for	The Applicant recognises the Council's overarching point that, over a 60-year operational period, relevant technologies, industry standards, recycling practices, monitoring systems and operational approaches may evolve. The Applicant has committed to ensuring the Scheme keeps up to date with relevant regulatory controls and industry standards, as secured through the **Outline OEMP [REP7-075]** and **Outline Decommissioning Statement [REP7-077]** by Requirements 14 and 20 respectively in Schedule 2 to the **Draft DCO [REP7-007]**. That notwithstanding, the Applicant also recognises the potential value in having an appropriate mechanism through which such advancements can be discussed, particularly where they may support improvement. The setup of the Innovation Forum would be included in the terms of reference for the community liaison group, with its ongoing provision secured through the **Outline OEMP [REP7-075]** and **Outline**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		example how often it meets, who its members are, what its powers are, what kind of monitoring or reporting is carried out. It is suggested that Wiltshire Council is the main point of contact / liaison. **[REP3-142]** It is suggested that the Innovation Forum would have a link to the Community Liaison Group, although it would be a separate group. Furthermore, the council is seeking for the OEMP, Decommissioning Strategy and Battery Safety Management Plan to be updated to reflect the Innovation Forum's role in replacement activities and decommissioning. The council is satisfied that the Innovation Forum is referenced within the relevant management plans, and is a sub-group under the Outline Terms of Reference for the Community Liaison Group. However, acknowledges and accepts that the role and operation of the Innovation Forum will be further developed in the detailed Terms of Reference to be submitted to and approved by the LPA under the dDCO.	**Decommissioning Statement [REP7-077]** by Requirements 4, 14 and 20 respectively in Schedule 2 to the **Draft DCO [REP7-007].** Discussions with Wiltshire Council and other relevant stakeholders such as Parish Councils will continue after consent to agree suitable engagement arrangements, and to ensure the terms of reference are designed to increase the burden on stakeholders**.**	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.12.14	Potential impact of the Scheme to Grittleton House	The Council are concerned around potential temporary construction impacts to Grittleton House and any subsequent impacts this may have on the current business present at the property. The council considers that the Applicant should work with Grittleton House's owners to identify additional and more robust and effective management proposals which could assist in mitigating the impact from the scheme on the business and hence on the future viability and conservation of the asset. The council's preferred option would be the re-location of the compound. Failing that, then a comprehensive compensation scheme should be agreed with relevant stakeholders.	The Applicant acknowledges the Council's concern and firstly notes that any effects during the construction period will be temporary in nature, and identified that there will be no effect on how the asset is experienced. Furthermore, the Applicant identifies that direct impacts to Grittleton House are managed through measures in the Outline Management Plans but discussion would identify further measures that could be considered when construction is taking place. The Applicant confirms it liaising directly with the owners of Grittleton House regarding construction impacts and any potential mitigation. The Applicant considers that any effects can be mitigated through suitable programming of construction works through the Community Liaison Group (CLG). Relevant businesses (including Grittleton House) would be invited to join the CLG. The Applicant identifies that impacts could likely be avoided in the first instance through engagement in the Community Liaison Group, giving	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			advance notice, agreeing suitable programming of works, and compensatory options should this not be possible. Works in proximity to businesses would be clearly communicated, and relevant mitigation measures (e.g. deliveries) are controlled via relevant management plans already.	

3.13 Soils and Agriculture

Table 3-13: Soils and Agriculture

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.13.1	Legislation and Policy	Wiltshire Council is of the opinion that the relevant policies have been considered.	The Applicant considers that **ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021]** has identified and appropriately considered all applicable legislation and policy.	**Agreed**
3.13.2	Methodology	Wiltshire Council has not provided comments on the methodology used for the assessment.	The methodology adopted within **ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021]** has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies. and is considered acceptable.	**Agreed**
3.13.3	Baseline	Wiltshire Council has not provided comments on the baseline applied in the assessment.	The baseline conditions which are detailed in **ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021]** are representative of the baseline site conditions. The baseline soil and agricultural land conditions of the cable route corridor were established through targeted survey.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.13.4	Assessment - BMV and site selection	Wiltshire Council request evidence that a full and comprehensive assessment of availability of land, at lower level than BMV, has been conducted.	An appraisal of alternative sites is presented in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Furthermore, the **Planning Statement [REP7-064]** provides justification for the use of BMV agricultural land in terms of policy, land use and other sustainability considerations.	**Agreed**
3.13.5	Mitigation / Management Plans – pollution control	Wiltshire Council request the Applicant to prepare plans to address pollution incidents for the construction / decommissioning phases and for any contamination during lifetime of project, which are agreed by the council.	Measures to manage and respond to pollution incidents will be set out in the detailed Construction Environmental Management Plan (CEMP) and the detailed Decommissioning Strategy. These documents will be prepared substantially in accordance with the **Outline CEMP [REP7-073]** and **Outline Decommissioning Strategy [REP7-077]**. The preparation and implementation of these management plans are secured through Requirements within Schedule 2 of the **Draft DCO [REP7-007].**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.13.6	Mitigation / Management Plans – soil remediation	Wiltshire Council are concerned that while the outline Soil Resources Management Plan (7.15) [APP-280] states that the measures outlined will also be relevant to works during the decommissioning phase, subject to relevant good practices at the time, there is no further reference to what these might be. The council would recommend a comprehensive soil survey with test holes dug to look for signs of soil compaction following decommissioning of the site, with remedial actions like sub-soiling to address any compaction prior to the return to agricultural use. The council is satisfied that the amendments made to the SRMP by the Applicant have suitably addressed this concern.	The **Outline Soil Resources Management Plan (SRMP) [REP7-079]** was updated at Deadline 3 to include more detail on soil inspections including specifying that inspection of soil boreholes and pits will be undertaken by a suitably qualified soil specialist in order to identify compaction or other defects in the soil that would require remedial action at decommissioning, prior to agricultural operations being resumed. A detailed SRMP will be prepared post consent and will be required to be in substantial accordance with the **Outline SRMP [REP7-079]** and is secured through Requirement 17 in Schedule 2 of the **Draft DCO [REP7-007]**.	**Agreed**
3.13.7	Sheep Grazing Reduced output from grassland	Wiltshire Council sought clarification on whether livestock grazing would be feasible within the solar park, including responsibility for and costs of any fencing, guards, or other protective	The Applicant confirms that sheep grazing beneath the solar panels may be possible, but it has not been relied upon as a mitigation measure in the assessment of effects on soils,	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		measures required. The Council also requested information on whether future grazing opportunities could help offset reductions in grassland productivity and whether the Applicant would undertake further assessment of the potential loss of agricultural production from land currently used for livestock grazing. The council accepts the Applicant's clarification in this regard.	agriculture, or agricultural output. Therefore, no detailed grazing strategy, grassland productivity assessment, or grazing-related mitigation has been undertaken. If grazing occurs, no additional protective measures would be required because the solar fields will be enclosed by stock-proof fencing. The Applicant does not intend to undertake further livestock surveys or assessments of agricultural productivity losses related to livestock. Effects on farm holdings, including impacts from the loss of productive farmland, are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [REP7-017] (Revision 2)**.	

3.14 Human Health

Table 3-14: Human Health

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.14.1	Legislation and Policy	Wiltshire Council considers that relevant planning policy has been adequately considered as part of the application.	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.	**Agreed**
3.14.2a	Methodology	Wiltshire Council is satisfied with the public health assessment methodology. 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 needed, and future submissions should reference the updated Wiltshire JSNA 2025 and the 2025 English Indices of Deprivation.	The methodology adopted within **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. 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.	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.14.2b	Methodology for CLG Terms of Reference	Wiltshire Council notes that while the draft DCO requires a Community Liaison Group, it considers this insufficient on its own. The council recommends a comprehensive Community Liaison Strategy (not just Terms of Reference) is produced and secured through the DCO, which includes setting out practical engagement measures, KPIs for engagement and wellbeing safeguards, and implementation arrangements. A draft Outline ToR for the CLG was shared with the council, and feedback was provided to the Applicant on 29 September. A revised Outline ToR for the CLG was shared on 1 October. Wiltshire Council consider the Outline ToR allows for future conversations to be developed, and detailed final agreement of the ToR and provision of a Community Liaison Strategy can be undertaken post-consent (or without prejudice to consent being given) and in coordination with the prospective members of the Community Liaison Group.	Following feedback from Wiltshire Council and Stop Lime Down, the **Outline Terms of Reference to the Community Liaison Group [REP7-133]** were submitted to the examination at Deadline 7. The Applicant confirms that the **Outline Terms of Reference to the Community Liaison Group [REP7-133]** have been drafted in accordance with the principles of the aforementioned Suffolk County Council guidance as appropriate. The production of a Stakeholder Communications Plan, or Communication Strategy would thereafter be prepared in consultation with the Community Liaison Group following its establishment, and ahead of any construction works on the Scheme commencing. 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. The Applicant has explored	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		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.	how additional community outreach can be undertaken – predominantly through the project website..	
3.14.2c	DCO wording and Outline Terms of Reference for Community Liaison Group	The Council has provided its further recommendations for wording to be included in the Outline ToR, where not included by the Applicant, and its recommended wording for Requirement 4 in the Draft DCO in its **Responses to Action Points Arising from the Hearings [REP7-135]** and Closing Statement.	Following feedback from Wiltshire Council and Stop Lime Down, the **Outline Terms of Reference to the Community Liaison Group [REP7-133]** were submitted to the examination at Deadline 7. The Applicant considers that the wording of Requirement 4 in Schedule 2 to the **Draft DCO [REP7-007]**, the **Outline Terms of Reference to the Community Liaison Group [REP7-133]**, and the wording of the **Outline CEMP [REP7-073]** to identify a Community Liaison Manager and provide a Stakeholder Communications Plan (as secured through Requirement	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			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 (4 and 13), and as such will be able to determine if sufficient detail has been included across these two requirements for them to be approved.	
3.14.3	Baseline	Wiltshire Council provided no comments on the baseline used for assessment.	The baseline conditions which are detailed in **ES Volume 1, Chapter 18: Human Health [APP-070]** are representative of the baseline site conditions.	**Agreed**
3.14.4	Assessment Results	Wiltshire Council provided no comments on the assessment results presented within the ES.	The assessment results set out within **ES Volume 1, Chapter 18: Human Health [APP-070]**, including likely significant effects anticipated, are acceptable.	**Agreed**
3.14.5a	Mitigation / Management Plans	Wiltshire Council provisionally agree the proposed mitigation measures as secured within the management plans signposted within the ES Chapter	The proposed mitigation measures set out within **ES Volume 1, Chapter 18: Human Health [APP-070]**, are considered acceptable, and secured within:	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		[APP-070] where they directly relate to public health. 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. Therefore, agreement of wider mitigation measures is subject to the position as relevant to each technical discipline in Sections 3.3-3.15 of this finalised Statement of Common Ground with Wiltshire Council. This row simply relates to the council's position from a public health perspective.	• Section 3.13 of the **Outline CEMP [REP7-073]**; • Section 3.13 of the **Outline OEMP [REP7-075]**; • Section 3.13 of the **Outline Decommissioning Strategy [REP7-077]**; • The **Outline PRoWPPMP [REP1-104]**; • The **Outline LEMP [REP7-081]**; • The **Outline SSCEP [REP1-108]**; • The **Outline BSMP [REP7-085]**; and • The **Outline CMTP [REP7-087]**. These measures are secured by Requirements 13, 14, 20, 16, 7, 18, and 15 respectively in Schedule 2 to the **Draft DCO [REP7-007]**.	
3.14.5b	Mitigation / Management Plans	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	The Applicant has committed to engagement with communities ahead of construction through the implementation of a Community Liaison Group, as secured through	**Not Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		effectively across the wide area and multiple communities affected by the project. The council considers that the CLG should operate during pre-construction, construction, and during peak replacement activities. It should also be re-established for the decommissioning stage.	Requirement 4 in Schedule 2 to the **Draft DCO [REP7-007]**. 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 OEMP [REP7-075]** and **Outline Decommissioning Strategy [REP7-077]** by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [REP7-007]**. The Applicant is required to submit a detailed CEMP substantially in accordance with the **Outline CEMP [REP7-075]** as part of the discharge of Requirement 13 in Schedule 2 to the **Draft DCO [REP7-007]**. The Applicant will at that point provide Wiltshire Council with details of the implementation of role of Community Liaison Manager, and of a Stakeholder	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			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 CEMP [REP7-073**and **Outline Decommissioning Strategy [REP7-077]** have 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.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Following feedback from Wiltshire Council and Stop Lime Down, the **Outline Terms of Reference to the Community Liaison Group [REP7-133]** were submitted to the examination by the Applicant at Deadline 7. The Applicant confirms that the **Outline Terms of Reference to the Community Liaison Group [REP7-133]** have been drafted in accordance with the principles of the aforementioned Suffolk County Council guidance as appropriate.	
3.14.5c	CLG Operational Timeframes	The council also considers that the CLG should operate for 5-years following final commissioning of the scheme (subject to any resolution from the CLG to curtail its operation).	The Applicant has committed to the Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the **Draft DCO [REP7-007]** operating for one year following final commissioning with the option to extend if required or agreed with the relevant planning authority.	**Not Agreed**

3.15 Other Environmental Matters

Table 3-15: Other Environmental Matters

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.15.1	Glint and Glare mitigation	In order to consider the sufficiency of the proposed glint and glare mitigation, Wiltshire Council required clarity on the following points: How the Applicant has calculated that the height of natural vegetation will reach 3.2m and what assumptions is this figure based on. How the impact of natural vegetation being 3.2m in height affects the significance thresholds as set out in the flow chart on page 114 of Appendix 20-4 Solar Photovoltaic Glint and Glare Study [APP-261]. The council accepts the Applicant's clarification in this regard.	The Applicant confirms that assumptions utilised for vegetation reaching a height of 3.2m are based on the current height of vegetation (2m in 2025) and annual growth of 0.4m per year, from now until the operational phase (2028). 3 years of growth of 0.4m per year results in 1.2m of growth to the current height of vegetation (2m in 2025) resulting in vegetation reaching 3.2m in height. This methodology is set out within the future baseline section, specifically paragraph 20.5.31) of **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]**. Vegetation will then be maintained at a height sufficient to screen views from the primary living space of dwelling receptor 24 throughout the operational phase. Once the vegetation reaches 3.2m in height, solar reflections would no longer be both geometrically possible	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			and visible and therefore no significant impact would be predicted.	
3.15.2	BESS fire suppression	The council was confused by the apparent insertion of the word "optional" placed in brackets after Fire Suppression System as it is listed in paragraph 1.2.1 to Appendix 3-1 to the submitted Environmental Statement [APP-182]. The council considered that the DCO should contain a Requirement to ensure that fire suppression systems are installed and operational in battery storage facilities. However, the council is satisfied with the amendments made to the Outline BSMP during the course of the examination in this regard.	The **Outline BSMP [REP7-085]** stipulates that the final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any FRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. The **Outline BSMP [REP7-085]** sets out the mitigation measures which will be secured through Requirement 6 ('Battery Safety Management') of the **Draft DCO [REP7-007].** As a minimum, a BESS Combustible Concentration Reduction (CCR) system will comply with NFPA 855 (2026) NFPA 69 (Ref 1) guidelines which require activation at no more than 10% of the Lower Explosive Limit (LEL) of the explosive gas(es). The	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			CCR must ensure the prevention of a dangerous build-up of explosive gases (on average 25% LEL within the BESS). An optional BESS water based fixed suppression system (automatic or dry pipe) or Thermal Runaway Propagation Prevention system (engineered to directly access cells within battery modules) may also be utilised following the results of the LSFT test.	
3.15.3	Minerals	Wiltshire Council considers that mineral resources have been adequately considered as part of the application.	The Applicant considers that the assessment of the likely effects on Mineral Resources presented in Section 20.2 in **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]**, including likely significant effects anticipated, are acceptable	**Agreed**
3.15.4	Waste	Wiltshire Council considers that waste has been adequately considered as part of the application.	The Applicant considers that the assessment of the likely effects on Materials and Waste presented in Section 20.3 in **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]**, and supporting document **ES Volume 3, Appendix 20-3 Materials and Waste Methodology**	**Agreed**

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			and Baseline [APP-260], including likely significant effects anticipated, are acceptable.	