

Lime Down Solar Park

IGP's failure properly to consult the public

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1. Summary

This report was prepared by Stop Lime Down. The findings are based on a detailed review of Island Green Power's (IGP) statutory consultation exercise conducted during the first quarter of 2025. The report is written from the perspective of the local community and describes the public reaction to IGP's consultation programme, including its published materials, exhibition content and direct face-to-face conversations with visitors to IGP's events.

The individuals who gave their views were all concerned about one or more aspects of the consultation process. These concerns related to content, clarity and adequacy. Many people found it difficult to engage and some did not believe IGP was being entirely open and honest about the impact of Lime Down. The findings are supported by documentary evidence and contemporaneous recordings of public feedback, referenced by location and date. The data is held by SLD and available for verification.

SLD believes that there is sufficient evidence:

- **to support Wiltshire Council's request for a second consultation relating to the lack of many details and the underground cable.**
- **for Wiltshire Council to challenge the adequacy of the statutory consultation exercise when it gives its opinion to the Planning Inspectorate.**
- **for the Planning Inspectorate to require IGP to undertake a further round of consultation (putting right the shortcomings described in this paper).**

Copies of this report have been sent to IGP, Wiltshire Council and the Planning Inspectorate.

2. The duty to consult

Planning Inspectorate guidance:

‘When dealing with a Nationally Significant Infrastructure Project (NSIP), the applicant has a statutory duty to consult the public extensively before submitting an application, meaning they must engage with local communities and relevant stakeholders to gather feedback on their proposed development, as outlined in the Planning Act 2008. This is considered a crucial part of the pre-application process for NSIPs.’

‘The Planning Inspectorate oversees the NSIP process and ensures that the applicant has adequately consulted with the public. In order to comply with Planning Inspectorate advice, it is necessary for the communication with the general public (in the form of plans, pictures, written and verbal explanations) to be readily understandable and honestly presented.’

Stop Lime Down (SLD), statutory consultees and people surveyed by SLD believe that IGP has failed to fulfil its legal obligations and to comply with Planning Inspectorate advice

3. Alternatives to Lime Down

From the start, it has been apparent that IGP’s selection of the location of Lime Down paid insufficient attention to the planning harms of the scheme. Landscape, heritage, environmental and a whole host of other impacts seem to have been set aside. Instead, undue focus has been on the willingness of a handful of landowners to enter into secret and lucrative agreements. This is key as planning harms have not been sufficiently avoided or mitigated. Moreover, In SLD’s opinion, parts of the IGP’s SSA are skewed in order to support the IGP’s preferred approach.

SLD’s letter to IGP (dated 26 November 2024) is contained in the appendix to this paper. SLD is surprised and disappointed not to have received a reply to this letter. It demonstrates a failure ‘to engage with local communities and relevant stakeholders’.

IGP’s Preliminary Environmental Information Report (PEIR) contains a Site Selection Assessment (SSA) Volume 3, Appendix 4-2. This document was made available (without notification) via the IGP website *after* the consultation period had already started. Members of the public were not notified of this late addition to the PEIR which was buried within many thousands of pages of technical documentation.

In addition, IGP's public consultation material and events failed to draw attention to the existence of alternatives, leaving the public in the dark and with an impression that Lime Down is the only possible location for the solar park. This is not the case. In SLD's view, there are locations superior to Lime Down. SLD is carrying out further analysis of the SSA and will, in due course, provide details of where the contents and conclusions are misleading and incorrect. We will be offering proper and reasonable alternatives at an early stage so they can be properly considered and consulted upon before Examination, as the NPS requires.

4. Proposals for an underground cable

IGP is proposing the construction of a major 400kV underground cable from Whitley (near Melksham) to the proposed solar installation. The cable alone (excluding the Lime Down Solar Park) would need planning approval and be a massive civil engineering project involving tunnelling under the M4 motorway and two national railway lines.

The proposed location of the cable has not been published. The consultation plan distributed to households outlined a 20km-long 'search corridor' but lacked a scale and presented multiple alternative alignments. The corridor's width varied significantly, ranging from approximately 0.5 km to 3 km, and passing close to multiple rural villages and settlements. This lack of clarity made it impossible for the public to understand the implications of the project.

IGP staff provided conflicting information at public events. According to guidance from the National Grid, the construction formation width for a 400kV cable typically ranges between 40-65m. The construction would require:

- The creation of a temporary parallel road capable of supporting heavy goods vehicles.
- The excavation of four trenches, containing three large power cables and a control cable.
- Storage areas for soil and construction materials.

The construction phase is projected to last two years, bringing considerable disruption, noise, dust and intrusive activities. Significant volumes of materials would need to be transported by road, affecting not only the immediate vicinity but also the wider road network. To date, IGP has not provided traffic impact assessments or details regarding heavy goods vehicle and worker commuting routes relating to the cable.

Beyond the construction phase, the project will have lasting consequences:

- Between 20 and 40 large, permanent visible concrete chambers will be required for maintenance and access to cable joints. No plans, illustrations or mention of these chambers was made during the consultation exercise..
- Land covering the cables will be subject to restrictions for the entire operational lifespan of the solar park, limiting its future use.

5. The Project Information Booklet and Leaflet

The Booklet and Leaflets were main sources of information available to the public. IGP deliberately downplayed and diminished the adverse impact of Lime Down. The Booklet and Leaflet were neither readily understandable nor honestly presented:

- Plans lacked an Ordnance Survey base and excluded existing development. Roads were only just visible against the pastel shading and it was impossible to judge the proximity of homes to the proposed solar infrastructure.
- Why didn't IGP use an Ordnance Survey background to help the public understand and interpret this vital information? Key villages such as Alderton, Easton Grey, Grittleton and Malmesbury were not named.
- Careful scaling incorrectly suggested hedges would be some 10m wide and distance between hedges and adjoining footpaths would be some 30m apart. The overall effect of plans was to visually shrink the proposed area of solar panels and other infrastructure.
- The image of the BESS was entirely misleading and appeared to be CGI generated. It gave no idea of the scale of what was proposed nor of the risks associated with BESS.
- Of great importance, no serious attempt was made to include meaningful photographs or accurate cross-sections that would illustrate the size and visual impact of the solar panels, inverters, substations and battery storage.

6. IGP's Events - The exclusion of Malmesbury

Ten events took place in various villages affected by Lime Down but Malmesbury was excluded from IGP's Care Consultation Zone and from the circulation to households of 4xA4 foldout plans. There are important reasons why the town should have been included:

- The area to the south and west of Malmesbury is frequently visited by Malmesbury residents for recreational purposes and Lime Down would spoil such outings.
- Malmesbury experiences frequent and serious flooding. This would be exacerbated by IGP's proposals.

- The prevailing wind is towards Malmesbury. Based on experiences elsewhere, a runaway BESS chemical fire at either of the proposed BESS locations would create highly poisonous fumes and the potential need for a mass evacuation of the population.

As a major destination and the principal town serving this part of the Cotswolds, the omission of Malmesbury inhibited engagement with the public.

Appendix (1) - Samples of public quotes

Relating to IGP's exhibition Materials

"I couldn't understand the plans, couldn't visualise and they couldn't answer my enquiries or didn't get a clear answer or someone gave a different answer – it was not a satisfactory consultation process" (12.2.25 Grittleton)

"Visited Corsham Library to look for the consultation documents as they were advertised as being available to the public - they were piled in 8 boxes non accessible at the back of a cupboard" (05.02'25 Corsham)

"I didn't see a visualisation at the Sherston IGP event that I attended, so I think we can take it that there isn't one or it looks too embarrassing." (21.02.25 Email)

"It would just be nice to know what route they plan across our land. We are farming and the junction boxes will be every 400 metre they say so it will affect land use, but if we don't know where they will be we can't plan. They seem to have no idea. Our land agent has been writing but no information back" (Property owner at Whitley 26.02.25)

"They have no idea, no layouts for the cable route or for the BESS, nothing, just nothing. This is not a consultation as there is no information on what they are Proposing" (Resident of Atworth near Whitney 26.02.25)

"This bridge down here (pointing at maps) it's the wrong bridge. This is the Littleton Drew bridge . They have the bridges the wrong way round . On any map it will (therefore) be showing the wrong route" (12.2.25 Grittleton)

"We asked a number of questions at the meeting and by the time we had been handed to the 5th member of staff, we were still not getting concrete answers. (26.02.25 Seagry)

Relating to advice given by IGP's staff

"I came here to ask questions but its not a consultation, not an opportunity to ask questions. People just standing around. Quite intimidating. I got here just before 5.30 and they said not open until 5.30 yet they were all there standing, I went back in but no one made a move to talk to me". (26.02.25 Shaw)

"I was really depressed and I think they are probably trying to pull the wool over our eyes" (12.02.25 Grittleton)

"Nick P had asked someone about flooding and was given an answer, he then came over to where I was standing and (with the same enquiry) was given a completely opposing opinion. That was responded to with "Oh well he's the expert, I'm not" (12.02.25 Grittleton)

On panel sourcing: "I spoke to one person who told me there are lots of rules and regulations about where they come from, and lots of checks...I then spoke to the CEO (of IGP) who said that nothing was secure and that any Chinese operator could just swap the panels and that there was no way they could be sure" (12.2.25 17.29)

"A waste of time attending as no concrete responses or actual information" PF Email (26.02.25 Goss Croft)

"One of the reps said they (the junction boxes) could go under the high tensile wire, the other said they couldn't" Property owner at Whitley (26.02.25 Shaw)

"They said they would build a moat around the BESS sites...quite vague as to the sizing of it..he said "a few good metres", I think it was a fire thing and would help with sound" (12.2.25 Grittleton)

On noise of traffic movements 508 staff a day(SLD stat) They say that 50% will travel in mini-buses (the rest in cars). The IGP reps said, "they would come after 9am after school hours. All sounds like rubbish to me as I don't see how they can fulfil the working day" (13.02.25 Corsham)

"I have to say it was a pretty frustrating webinar. It feels like one big fob off with very few real finite answers. I asked about how far the solar farm could be viewed from and got some long-winded answers that made me none the wiser" RH Email (28.02.25 Webinar)

Relating to correspondence with IGP

“I have asked Will Threlfall a series of pertinent questions for the purposes of informing my contribution to the consultation but received no response. I e-mailed him on 16 and 29 January in advance of a meeting which took place on 13 February.

I received no written response and my questions were not adequately dealt with at the meeting. Mostly, WT said he didn't know the answers and would have to make enquiries.

I made further substantive points by e-mail on 27 February. I have received no response.” (17.04.25 Resident very directly affected by Lime Down)

Appendix (2) - Letter dated 24 November 2024

Dear Will Threlfall,

26 November 2024

Lime Down Solar Park - Alternatives

Island Green Power (IGP) has notified the local community that it is planning to consult on its proposal for Lime Down in Q1 2025. Up until now, IGP has published a plan for only one option although IGP has made it clear that it has also considered alternatives south of the M4 Motorway.

IGP will be aware of its obligations under the Infrastructure Planning (EIA) Regulations 2017 reg.14(2)(d) to include in its environmental statement a description of reasonable alternatives. IGP will also be aware of para 4.3.29 of NPS EN-1 which states:

'It is intended that potential alternatives to a proposed development should, where possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable base in relation to any alternatives which are particularly relevant).

We consider that 'appropriate consultation' requires that the statutory consultation properly sets out the alternatives available to IGP so that proper responses can be provided. This is desirable as it both gives those affected by the scheme a voice, and also allows IGP to improve its proposals and present a scheme which mitigates harm. Considering that an assessment of alternatives should be 'proportionate' (NPS EN-1 para 4.3.2), we consider a proportionate approach would consult on this issue at an early stage to minimise the ongoing work required (and minimise difficulties at the examination stage). Given that IGP has already considered alternatives, it is particularly appropriate to now put those alternatives before the community, in an approach which is proportionate and allows appropriate consultation so that a suitable evidence base in relation to alternatives is built up.

We also note in para 4.3.29 of NPS EN-1 that, once an application is made, the onus in respect of any new alternative put forward falls on the person proposing that alternative. The corollary of this is that, prior to such an application, it is necessary for the applicant to assess alternatives put forward. This is, among other things, to make sure that the reasonable alternatives which must be included in the ES are in fact considered and appropriately presented (see, inter alia, NPS EN-1 Para 4.3.15).

Stop Lime Down (SLD) and its consultants will thoroughly evaluate IGP's application for Lime Down once further details become available. An initial assessment is summarised in the appendix to this letter. It is already apparent that Lime Down, if approved, would cause severe environmental damage, adversely affect the quality of life of many people and not be the best option as required by NPS EN-1, para 4.3.9. In SLD's opinion, Lime Down appears to be the most damaging of all solar NSIPs proposed anywhere in the country.

SLD believes that at least two alternatives should be consulted upon by IGP:

1. An analysis of all of the sites rejected by IGP

IGP's Lime Down proposal involves the location of solar panels up to 20 kms from the National Grid connection at Whitley. Given IGP's willingness to operate over that distance, it is assumed that IGP's search for suitable locations would have at least included the area

within a radius of Whitley of 20 kms. The public should be informed of and consulted on the reasons why all other sites in this area have been rejected.

2. Making applications under the Planning Act 1990

Net Zero and the delivery of solar power is a Government priority and the deployment of solar projects in the right place is to be welcomed. Currently, there are 32 solar NSIPs published on the Planning Inspectorate's website. The number is growing rapidly and, combined with various other sources of power at the planning, design and delivery stages, the Government's targets are achievable. However, owing to their massive scale and impact, NSIPs are not always the best solution as demonstrated by Lime Down.

Wiltshire has the second highest number of approved solar parks compared with all other counties and has already made a major contribution towards achieving Government targets. These sites have been approved by Wiltshire Council using powers contained in the Planning Act 1990. The Government has expanded the role of local government and the Council is now responsible for dealing with all solar park applications up to 150 MW.

Wiltshire Council has demonstrated how, with the use of local knowledge and expertise, numerous solar schemes can be nestled into the landscape with the minimum of adverse environmental impact. In this part of Wiltshire the geography and development patterns make NSIPs difficult, if not impossible, to justify. The use of the Planning Act 2008 is a 'sledgehammer to crack a walnut'.

Statutory Consultation

In view of the requirements set out in EIA Regulations and the shortcomings of IGP's current proposal for Lime Down, IGP must ensure the public are offered choices in order to be able to assess whether Lime Down is indeed an appropriate option for a solar park to be linked to Whitley. Should IGP go ahead without genuine alternative options, the Planning Inspectorate will be formally requested:

- 1). to ask for a second round of Statutory Consultation including detailed presentation of IGP alternatives and/or
- 2). to delay acceptance of IGP's application until such time as the absence of alternatives and their evaluation is resolved.

Yours,

Sir Mike Pitt

On behalf of Stop Lime Down Steering Committee

With copies to Planning Inspectorate and Statutory Consultees

Appendix to letter addressed to Will Threlfall

Initial concerns relating to proposals for Lime Down

- 1). **The Cotswolds** rank with the Lake District and Yorkshire Moors as the most beautiful landscapes in England. Lime Down would be the first and only NSIP solar park in the Cotswolds (as defined by Natural England). The Cotswolds are of national importance, admired throughout the world and valued by tourists and locals alike for their unspoilt countryside and Cotswold stone villages.
- 2). Historic England has designated **The Fosse Way** as an ancient monument. It would become engulfed by solar infrastructure if Lime Down were approved. As an up to date footpath and bridleway, the Fosse Way contributes to a network of local and regional communications, including the Palladian Way, Whitewalls Way, North Wessex Way and the Athelstan Pilgrim Way.
- 3). The proposal for Lime Down impinges directly on **Bradfield Manor**, designated by Historic England as a Grade One listed property.
- 4). Lime Down would be too highly dispersed, involving the shoehorning of solar infrastructure in between **nine Cotswold villages** and the despoiling of approximately 50 sq km of Cotswolds landscape.
- 5). **Norton village** would be surrounded by solar infrastructure and life in Norton would be intolerable. Lime Down would impact recreational and travel routes between Norton and other locations, significantly harming residents' recreational amenity. It would also cause substantial harm to the landscape and views, and entirely deprive residents of the rural feeling and setting of their lives. The landscape would become industrialised and the setting and enjoyment of this village would be fundamentally harmed.
- 6). Solar infrastructure would be too close to and visible from the adjacent **Cotswold AONB**.
- 7). The local area is susceptible to serious **flooding** and there are concerns relating to the risk of **aquifer and groundwater pollution**.
- 8). The chosen location of Lime Down is highly exposed and **fails to take advantage of existing barriers** such as major roads, railway lines and landscape features.
- 9). Access for HGVs and other **construction traffic** to major roads and J17 of the M4 would be poor and involve the use of narrow unsuitable country lanes, damage to verges and heavy lorry traffic passing through rural settlements. The need for substantial road improvements would cause additional environmental damage.
- 10). The location of Lime Down would involve the construction of 20 km length of disruptive and very expensive 400V **underground cabling**, including tunnelling under the M4 motorway. Proposing the solar park at this northerly location reduces the cost effectiveness and efficiency of solar panels.