

Lime Down Solar Park (LDSP)

Adequacy of Consultation Report by Stop Lime Down (SLD)

Report to Wiltshire Council - 19 September 2025

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1. Summary

This report is provided to Wiltshire Council to set out SLD's¹ position on the adequacy of the consultation process undertaken by Island Green Power ('IGP') in respect of Lime Down Solar Park ('LDSP'). Wiltshire Council are invited to append this report to any Adequacy of Consultation Representation that it makes to the Planning Inspectorate ('PINS') pursuant to the Planning Act 2008 ('PA 2008'). SLD considers that, at this stage, any application under PA 2008 for examination of this scheme should be rejected and further consultation required before the matter proceeds.

In short, SLD are of the view that the consultation process undertaken by IGP has been materially substandard in a number of respects. SLD considers that there were both defects procedurally in the consultation, and defects substantively in the documents and information put forward for consultation which rendered the process not to be '*readily understandable and honestly presented*'. It is well known that a consultation must '*include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response*'.

Consultation has a number of benefits for both the applicant and for interested parties. It provides for the collation of information and the putting forward of the best application, both for the applicant but also for local people who would ultimately host the scheme. Thus, it is critical that organisations and the general public that would

¹ Stop Lime Down comprises a group of local residents who have come together to object to the proposal to construct Lime Down Solar Park.

host the scheme are given a voice, and their views on the adequacy of the consultation and the processes adopted by IGP are key.

2. The duty to consult

The Planning Inspectorate's (PINS) guidance states:

'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.' (our emphasis)

This guidance reflects the position at law. The commonly cited approach to consultation is that approved in *R v North and East Devon HA, ex parte Coughlan* [2001] QB 213, at [108].

'To be proper, consultation must be undertaken at a time when proposals are still at a formative stage; it must include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response; adequate time must be given for this purpose; and the product of consultation must be conscientiously taken into account when the ultimate decision is taken: R v Brent London Borough Council, Ex p Gunning (1985) 84 LGR 168.'

There are significant benefits to be derived from consultation, and indeed an applicant (and the host community) will lose out on those benefits when a consultation is improperly conducted. Guidance explains:

'Early involvement of local communities, local authorities and statutory consultees during the pre-application stage, both through consultation and other forms of engagement, can bring about significant benefits for all parties, by:

- *helping the applicant identify and resolve issues at the earliest stage, which can reduce the overall risk to the project further down the line as it becomes much more difficult to make changes once an application*

has been submitted and accepted for examination;

- *enabling interested parties to understand and influence proposed projects, providing feedback on potential options, and encouraging the community to help shape the proposal to maximise local benefits and minimise any disbenefits;*
- *enabling applicants to obtain important information about the economic, social, community and environmental effects of a scheme from consultees, which can help rule out unsuitable options; and*
- *enabling appropriate mitigation measures to be identified at the outset; considered and, if appropriate, embedded into the proposed NSIP before an application is submitted.'*

3. Statutory Consultation - 29 January until 19 March 2025

The next sections are written from the perspective of the local community and describe reactions to IGP's consultation process, including IGP's published materials, exhibition content and direct face-to-face conversations at IGP's events.

SLD has catalogued what the community told us, including correspondence and spoken word recordings made immediately following IGP's events. These public views can be made available if needed.

Cable Route

During consultation, there was a distinct shortage of detail about the cable route. In this regard, SLD relies upon the comments of Wiltshire Council itself which has recognised that there '*was [a] lack of detailed assessment information relating to the cable connection route, meaning that the consultees had insufficient information to understand the full likely local impacts of the development*'.

SLD agrees with this assessment from the Council (in its letter to IGP dated 6 June 2025). Indeed, SLD has records of individuals who have expressed precisely this concern in trying to interact with and provide consultation responses. This is very troubling, particularly for farmers and other agricultural workers in the area for whom the cable route poses a significant threat to one (and possibly more) harvests. For example, one consultee has reported to us that:

'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.'

Underground cables will affect at least 40 farms. SLD agrees with the Council that a proper approach would be to conduct further consultation with sufficient detail to permit proper and '*intelligent consideration and an intelligent response*'.

Project information leaflets and booklet

These were the main source of information made available to the wider community. It is unclear to SLD why IGP chose to use materials which did not accurately reflect LDSP or its impact. A proper approach would be to present the impacts of the scheme as currently assessed openly and fairly, so that '*intelligent consideration and an intelligent response*' could be provided.

SLD has concerns about the indicative layout plan provided with the **Public Consultation Leaflet**. Several communities (as listed) would be significantly affected by the scheme but are not marked, which negatively impacts intelligibility of the map and makes it harder to identify receptors for impact:

:

- Alderton, which is immediately to the west of the scheme,
- Grittleton, which is adjacent to the preferred route of the cable,
- Other villages, and Malmesbury.

In addition:

- There was neither an indication of HGV routes nor extent of the use of those routes. This negatively impacts intelligibility, as it is difficult for the reader to identify whether they will suffer an impact from the construction phase of the scheme.
- For a proper understanding of cumulative effects and impacts, the map should have also shown other solar development (or consented development). This is pertinent, for example, to Hullavington with an existing solar farm which places solar development closer to this village than the map would suggest.

SLD also has concerns about the **Project Information Booklet** which again fails properly to present the scheme and provide for a properly intelligible presentation of its impacts.

- The statement in the introduction that the energy produced by the scheme ‘is enough clean, affordable electricity to power 115,000 homes’ suggests to the lay reader that this power would be produced consistently and avoid the need for non-renewable sources for those homes. This fails to draw attention to the utilisation of solar which in the UK is typically below 20% over a year, and thus negatively impacts the intelligibility of the consultation documents, and overestimates the benefits of the scheme.
- The booklet states that the design ‘will make sure the risk of flooding is not increased anywhere else’. It is unclear on what basis that such assured comments can be included in consultation documents (especially when this area is already prone to serious flooding).
- On a number of occasions, the booklet uses images of infrastructure which are not accurate or reflective of what will be installed if LDSP is consented. Of note is the photograph of solar panels at page 11 which appear substantially lower than those proposed by IGP. Also of note is the omission from this document (but the inclusion in other IGP schemes, such as East Pye) of additional images of the solar panels which will be installed. Further, a photograph on page 27 is used which again appears to minimise visual impact. Such an approach reduces the value of consultation documents and the likelihood of properly informed consultation responses.
- There is a sketch on page 11 which suggests that the panels will be lower than the fencing. Given the height of the solar panels currently proposed, this does not permit consultees to properly understand the height and impact above the fence line of any of the solar installations.
- There has been a consistent avoidance of the use of Ordnance Survey base maps. This is compounded by the difficulty in seeing roads in the plans. This is critical as it makes it both difficult to understand when villages, but also parts of villages and residential development, will be impacted by the scheme. It impedes intelligibility, and in particular makes it difficult for those who will be affected by the scheme to identify those affected and provide intelligent and relevant consultation responses.
- Careful scaling of the plan suggested, incorrectly, that hedges would be some 10m wide and the distance between hedges and adjoining footpaths would be some 30m. The overall effect of the plans is to visually ‘shrink’ the proposed area of solar panels and other infrastructure. This again impedes understanding of the impacts and makes it harder for individuals to provide intelligent consultation responses which will assist in mitigating harms.

- The image of the BESS, said to be illustrative, is CGI generated and does not appear to accurately reflect the development which will be built out. This is important; many people will not have experienced the appearance of BESS. It gave no idea of the scale of what is proposed nor of the risks associated with BESS. Such information is needed for an intelligent response from consultees.
- Of great importance, no serious attempt was made to include meaningful diagrams or accurate cross-sections that would illustrate the size and visual impact of the solar panels, inverters, substations and battery storage. This again impedes understanding of the impacts and makes it harder for individuals to provide intelligent consultation responses which will assist in mitigating harms.
- It is unclear the extent to which any of the villages and road users who would be affected by the traffic generated during the construction of Lime Down and/or cable route were sent the Public Consultation Leaflet.

4. Targeted Consultation - 3 June until 11 July

The manner in which the Targeted Consultation was publicised and its relatively low profile led to an impression that it was '*open to relevant stakeholders*' but not open to the general public. There were no exhibitions attended by IGP representatives and correspondence received by SLD at the time suggested that the public at large believed they were excluded.

While SLD recognises that IGP must adopt an iterative process, that iterative process must provide a fair and open opportunity for consultation. This is particularly so given the changes involved, which include abnormal loads, HGVs and site traffic which would cause a notable traffic impact and safety concerns in the local community. Indeed, it remains unclear how IGP intends to manage this traffic on such narrow and unsatisfactory roads.

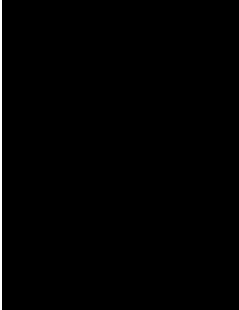
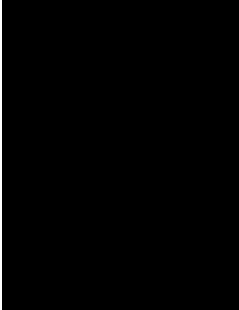
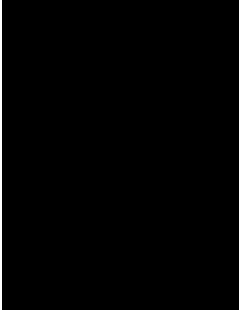
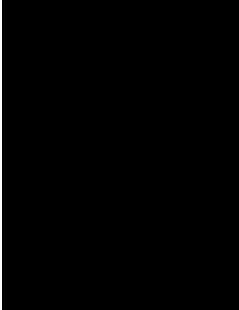
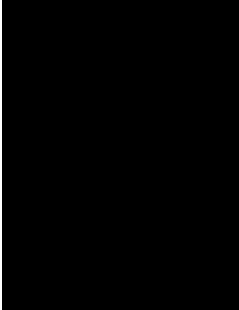
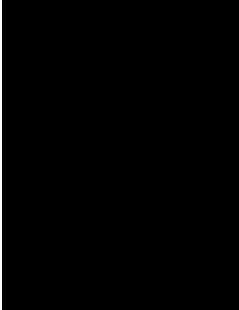
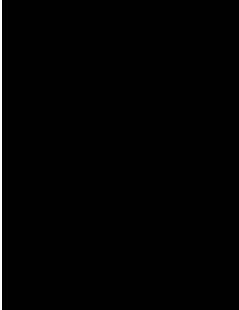
IGP has suggested that the additional land take comprises '*small increases to the development area*'. However, a landtake of 3.24ha is significant. It is, for example, in excess of 4.5 football pitches (or could accommodate, if combined, 360 dwellings and their gardens).

Of particular concern is the proposed amendment 02 in the targeted consultation which relates to a substantial area of the Fosse Way, an unmade byway much used by walkers, cyclists and horse riders. The document prepared suggests it would be needed only for one Abnormal Indivisible Load but when questioned it appears it is

also to be used by HGVs. On either basis, this concerns an important asset of heritage value being used within the scheme. Such assets are of wider public interest, and a proper approach would be one which allows those wider public interests to be expressed.

5. Wiltshire Councillors for the wards most affected

The Councillors listed below represent the 7 electoral wards most affected by Lime Down. All of them voted in favour of a Council motion highlighting the shortcomings in IGP's statutory and targeted consultation, and called for a further and improved period of consultation open to the general public:

-  Sherston Ward
-  By Brook Ward
-  Corsham Pickwick
-  Corsham Without
-  Malmesbury
-  Melksham Without North and Shurnhold Ward
-  Malmesbury Ward

6. Town and Parish Councils directly affected

The following 14 Parish Councils have already contacted SLD, all agreeing that consultation should be repeated:

- Atworth,
- Broughton Gifford
- Chippenham Without,
- Easton Grey,
- Grittleton,
- Hullavington,
- Kington Langley,
- Luckington,
- Melksham Without,
- Malmesbury Without
- Norton and Foxley,
- Sherston,
- Stanton St Quinton.
- Yatton Keynell.

Community Action Whitley and Shaw (CAWS) represents 1600 residents and also agrees that consultation should be repeated.

We are awaiting further replies from other Town and Parish Councils following their individual formal Council meetings.

7. Wiltshire Council

As will be known to the Council, it is a unitary authority serving a population of over 500,000 people. It is LDSP's host authority, local planning authority, highways authority and lead local flood authority.

The elected members and qualified professional officers of the Council have a reputation for thoroughly evaluating complex planning applications and coming to a balanced view. The application for LDSP has been given careful consideration, debated at length and discussed by the Cabinet and full Council on two separate occasions. Minutes of the meetings are available on the Council website. It should be noted that Wiltshire Council expressed dissatisfaction with both IGP's statutory and targeted consultation exercises and requested that they be repeated and open to the general public.

On 4 March 2025 there was a unanimous resolution of the Cabinet which noted that IGP turned down an invitation to engage and meet with Elected Members. The wording of the resolution included:

- *'The Leader reported his and other Cabinet Member disappointment that following an invitation to attend this meeting to respond to comments and clarify elements of their scheme proposals, Island Green Power were not present'*
- *'The Cabinet and other members of the Council expressed disappointment and frustration that the applicant had not responded to the invitation to attend this meeting, indicating a level of disrespect to the Council and residents'*

On 22 July 2025 there was a resolution of the Full Council with 85 members in favour, 5 abstentions, and none against. It included:

- *'To note that the Council has previously requested that IGP's statutory consultation exercise should be repeated.'*
- *'To ask the Leader to formally write to IGP and the Planning Inspectorate (PINS) drawing attention to the serious inadequacies of IGP's statutory and 'targeted' consultation exercises, calling for them to be repeated with all consultation open to the general public.'*

SLD considers these resolutions particularly pertinent given the representative role of the Council for the local community which will host the scheme if consent is granted.

8. Member of Parliament for the South Cotswolds

LDSP would be located within the South Cotswolds Parliamentary constituency. The sitting Member of Parliament is Dr Rosalind Savage MBE.

On 7 July 2025 Dr Savage MP wrote to IGP (see Appendix 1) to express her significant concerns about the approach of IGP in its statutory and targeted consultations. SLD agrees and commends the points she makes therein and would invite IGP to respond to them appropriately. In particular, she formally invites a further consultation 'to allow meaningful public engagement on these newly disclosed proposals'.

9. IGP's Site Selection Assessment Report (SSAR)

SLD has had longstanding concerns about IGP's approach to the evaluation of alternatives. For example, the matter was raised by SLD at a meeting with IGP and in a letter dated 26 November 2024 (See Appendix 2).

The SSAR forms an important part of IGP's Preliminary Environmental Information Report (Vol 3, Appendix 4-2) and comprises 55 pages of text, charts and plans.

The report concludes that '*there are no obviously more suitable locations within the search area than the proposed scheme*'. This opinion was relied upon on numerous occasions by IGP and its consultants during the statutory consultation period and thereafter. Members of the public were perplexed by the decision to locate Lime Down in the Cotswolds, so remote from the Point Of Connection (POC) to the National Grid. Why would such a difficult and remote site be selected? When questioned at events or at meetings, the stock response was '*there are no other suitable sites*' or the equivalent.

For the purposes of consultation, SLD considers that key context to such an answer is the criteria applied to reach this conclusion on suitability, and whether they reflect a standard or non-standard approach to selection. To present criteria without their

rationale does not provide sufficient reasoning for ‘*intelligent response*’. In this respect, given IGP’s pedigree in this area of development, IGP’s approach to other developments is relevant and important.

Topography

IGP’s SSAR starts by considering possible locations for the solar park in the area within a radius of 20km from the POC. It addresses a range of technical and planning considerations and progressively narrows down the number of potential sites.

In the SSAR, considerable weight is attached to topography and this factor alone eliminates from consideration vast areas of land closer to the POC. The SSAR states in paragraphs 2.4.13 and 2.4.14:

‘The development of large scale solar development requires flat land as this is ideal for construction and helps reduce visual intrusion. As mentioned earlier in this SSAR, flat land also limits the shading between Solar PV Panels and enables the Solar PV Panels to be optimally configured for best production levels.

Topographical constraints within the unconstrained areas identified at Stage 2 have also been identified and mapped (as shown on Figure 5, Annex C). All land with a 3% or less gradient which is considered to be very flat and optimal for solar generation has been considered potentially suitable to meet the Scheme’s requirements of maximising energy generation and avoiding visual intrusion. This land has been taken forward to the Stage 4 assessment therefore identifying the flattest areas of land within the unconstrained area.’

It is relevant to consider another one of IGP’s developments, Green Hill in Northamptonshire and Buckinghamshire. Notably, the above paragraphs are repeated in the SSAR, word for word, with one notable change: **the figure of 3% is replaced by 5%**. Correspondence with IGP has given no proper explanation for the difference of approach. This is particularly important for consultation, as it is necessary for an informed response to know the reasoning behind key features of the scheme. This is a key feature; indeed, it is critical when one notes the significant constraints in the area.

This is a serious question for IGP and the SSAR, and one which requires explanation for proper consultation responses to be given. SLD notes that this is a clear, but not the only, example of where an issue with the site selection has arisen which is relevant to consultation.

10. A new consultation

Clearly, SLD and numerous individuals and organisations believe there should be a further period of consultation open to the general public. It would be an ideal opportunity for IGP to improve the clarity of its published material and at its events, providing the public with a genuine opportunity to engage and giving IGP the information it needs to develop and promote the best possible scheme.

In the context of a 64 year scheme (including commissioning and decommissioning), the short additional period for consultation is minimal. Given the significant defects in IGP's consultation exercise and the benefits to be derived from proper consultation, SLD considers further statutory consultation is needed before this scheme is put to examination.

---- End ----

Appendix 1

Dr Roz Savage MP
Houses of Parliament
Westminster
London
SW1A 0AA

Will Threlfall, Island Green Power



7th July 2025

Dear Will,

Lime Down Solar Park: Concerns Regarding Abnormal Load and Construction Vehicle Routes

I am writing to raise serious concerns about the recently disclosed construction access routes and Abnormal Indivisible Load (AIL) transport plans for the Lime Down Solar Park. It is deeply troubling that these critical details were not included in the original consultation materials, despite the significant implications for local communities.

This omission has seriously undermined public trust in the consultation process. Many residents now believe that this information was deliberately withheld, given the scale of the logistical, environmental, and social challenges these routes pose.

Among the most pressing issues raised are:

- The proposed use of all three roads north of M4 Junction 17, impacting communities in Swindon, Cirencester, and Chippenham - with no evidence of cumulative impacts being considered.
- Plans to route AILs and heavy construction traffic along unsuitable rural lanes near Sherston, Grittleton, and Rodbourne. These narrow routes would require road widening, vegetation clearance, and significant temporary works, causing major and prolonged disruption.
- Extensive works on the A429, including the construction of a new link road to accommodate wide loads.
- The apparent exclusion of the A429/B4014 junction, an existing and logical heavy vehicle route, from the current plans - raising serious questions about the overall coherence of your transport strategy.

Understandably, Island Green Power now faces strong opposition from residents across a



wide area who were not properly consulted during the statutory process. Given the scale of anticipated disruption - particularly with 13 AIL movements involving 16-axle vehicles - there must be full transparency and public accountability going forward.

I am also concerned to note that:

- New land acquisitions are being sought in locations including north of Norton, near Pig Lane, and alongside the A429, with little prior disclosure.
- Significant road closures and temporary works are being planned at key junctions, including A46/B4040 and A350/Corsham Road, which will affect local businesses, residents, and emergency services.
- Feedback from earlier consultations has still not been adequately addressed, despite prior commitments.

Given the seriousness of these developments, I formally request the following actions:

1. A clear explanation of why the construction and access routes were omitted from previous consultation documents.
2. Immediate publication of full details of all proposed transport works, including passing places, road widening, and land acquisition boundaries.
3. An extension of the current consultation period to allow meaningful public engagement on these newly disclosed proposals.
4. A commitment to holding in-person consultation events in the most affected communities, including Sherston, Rodbourne, and villages along the A429 and Fosse Way.

The long-term legitimacy of this project will depend on Island Green Power's willingness to engage openly and honestly with the public. I urge you to respond swiftly, with the transparency that local residents rightly expect.

Yours sincerely



Dr Rosalind Savage MBE
Member of Parliament for South Cotswolds

Appendix 2

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