Comments on Relevant Representations

1. Introduction

I did not participate in the Applicant's first consultation because I did not understand the true scale or location of the Lime Down scheme. Although I saw some early flyers, the plots appeared to be possible options rather than areas intended for one full development, and nothing conveyed the extent of the project as a whole. I only looked further into it after local "Stop Lime Down" banners appeared, and even then the issues remained unclear. Having since reviewed a number of the Relevant Representations, I note that more than 80 residents describe similar confusion about the project's scale, locations, and ecological implications. I support landowners' rights and the urgent need to reduce CO_2, but had the Applicant's early communications been clearer, I would have engaged much sooner. As a Malmesbury resident who values the character of our countryside, I am concerned that the Applicant's public-facing documents and the structure of the early consultation did not enable affected communities to understand the full nature of what was being proposed.

2. Misleading Information in Public-Facing Materials

Across the RRs I reviewed in detail, I saw the same concerns coming up again and again about the way the Applicant presented information to the public. Many respondents felt the materials were misleading, incomplete, selective, or simply not accurate enough to give a fair understanding of what was being proposed. These concerns fell into several clear themes.

2.1 Misleading naming and geographic framing

A significant number of RRs objected to the project name "Lime Down," because it does not correspond to any known local place. Several respondents said the name gave the impression of a single, distant, or benign feature, rather than a large, dispersed scheme spread across miles of countryside. As [redacted] put it, "The project name implies that Lime Down is some single geographic feature, the reality is otherwise… The site will affect 11 square miles of countryside." Others made similar points, noting that the name suggested open downland rather than a landscape made up of villages, hamlets, farms, and long-established communities.

This concern was often paired with objections to the use of the term "Solar Park," which many felt implied a single, contained site rather than a network of separate parcels of land. One RR described it simply as "a misnomer… this is not a park."

These naming choices, combined with maps that left out key settlements and transport routes and lacked shading to indicate residential areas or built-up communities, created a public-facing picture that made the scheme appear smaller, simpler, and further from people's homes than it actually is. As Catherine Anna O'Dwyer observed in her Relevant Representation, the project boundary maps omitted Malmesbury and the A429, a concern echoed by many residents who felt the visual material did not reflect the true context of the scheme.

2.2 Misleading visual simulations and photographic representations

Fourteen RRs raised concerns about the Applicant's visual materials. Many felt the images understated the height, massing, and visibility of the infrastructure. Andrew Carnegie noted that "Panels are 5m high, significantly taller than any current hedge," yet the visualisations suggested they could be screened easily. Rosamund Bull pointed to "a very misleading photo… showing sheep amongst panels which are nowhere near 4.5m high."

A number of RRs also highlighted what was missing: winter views, views from public rights of way, and any realistic depiction of glint and glare. Several respondents said the simulations did not show the worst-case scenarios, which meant the public could not get a true sense of the visual impact.

2.3 Misleading claims about agricultural compatibility

Several Relevant Representations challenged the Applicant's suggestion that sheep grazing would continue beneath the panels. Elizabeth Anne Threlfall described "misleading suggestions that sheep can graze underneath," and others noted that the land in question is predominantly arable, not pasture. Andrew Carnegie wrote, "There are no sheep in any quantity here… this is prime Wiltshire agricultural land with arable crops." Taken together, these comments indicate that the Applicant's imagery and descriptions may have conveyed an impression of a more "farm-friendly" scheme than is realistic, implying that existing agricultural practices could continue largely unchanged when that is not the case.

2.4 Misleading assertions about temporariness and reversibility

Ten RRs questioned the Applicant's repeated use of the word "temporary." Many felt that a 40–60 year lifespan is effectively permanent for the people who live here now and for the next generation. Finlay McLeish wrote, "A 40-year installation is not 'temporary'." Sheralyn Blackett added, "The idea that land could be restored after 60 years is naive and misleading."

Others raised concerns about long-term soil compaction, habitat fragmentation, and the loss of Best and Most Versatile farmland, all of which cast doubt on the idea that the land could simply be returned to its previous condition.

2.5 Misleading comparisons to 'similar projects'

Six RRs noted that the Applicant's Environmental Statement relies on comparisons to projects that do not exist at this scale or in such sensitive landscapes. Mrs Penelope Farquharson wrote, "Assumptions… based on similar projects are misleading since no similar projects have ever been built." George Edward Harford made a similar point, saying that claims about comparable schemes were "misleading" because nothing of this size and configuration exists in England.

2.6 Misleading energy generation claims

Several respondents challenged the Applicant's claim that the scheme would power 115,000 homes. Mostyn Neil Hamilton wrote, "This disguises the reality that, in the winter, very little solar generation is possible." Mary Smith also questioned the figures, noting that the stated output would require the panels to operate at full capacity for far more hours per day than the UK's seasonal daylight allows.

2.7 Misleading or inadequate consultation

A number of RRs described selective information, inconsistent answers, and a general sense that the consultation process did not give people the information they needed. Sally Cambridge wrote that "public-facing consultation materials relied on misleading photographs, diagrams and claims." Edward Henby said the boards were misleading and that staff "gave different answers to the same questions."
Taken together, these themes show a pattern in the Applicant's public-facing materials that tended to minimise the perceived impacts and obscure the true scale and nature of the proposal.

3. Coercive Behaviour, Financial Inducements, and Suppression of Early Opposition

Alongside concerns about unclear or incomplete information, a separate and troubling theme emerged from the Relevant Representations: several respondents described interactions with the Applicant that they perceived as pressurised, financially one-sided, or discouraging of early discussion. I was not surprised to see these concerns raised. When I first learned of the project's size, a local resident mentioned that some landowners had been asked not to talk about the proposals while negotiations were ongoing. I initially dismissed this as unlikely — it sounded more "Wild West" than Wiltshire countryside — but after reading the RRs and understanding that a scheme of this scale could bypass the local council through the DCO process, I can appreciate why some residents felt uneasy. This has made me more concerned about how large-scale projects of this nature may affect the future of our countryside.

3.1 Financial inducements tied to withdrawal of objections

Multiple Relevant Representations described letters sent to around 45 landowners offering up to £50,000 on the condition that they withdraw objections. M4 Property Solutions Ltd referred to a "financial incentive to withdraw their objections." Clancy Chamberlain described the attempt as "buying locals' silence." David Webb quoted clauses requiring landowners to "not object… and withdraw any previous objections." These accounts were consistent across several RRs and were also reported in local media.

3.2 Pressure, coercion, and undue influence

Some RRs described landowners or tenant farmers feeling pressured or intimidated. David Webb wrote that "one farmer… felt threatened and had no option but to sign." Mattias Ljungman referred to "landowner coercion or misleading lease agreements." These comments suggest that some people may not have felt free to express their views openly during the early stages of the project.

3.3 Suppression of democratic participation

Several respondents framed these actions as attempts to suppress public involvement. Rachel Bristow wrote that such inducements "undermine democratic participation and breach the Aarhus Convention." David Craig Copeland described the letters as "financial inducements to stifle democratic opposition."

3.4 Consequences for early engagement

If landowners and tenant farmers were discouraged from discussing the project, it helps explain why early engagement was unusually low for a scheme of this size. Without open discussion, the wider community would not have understood the scale, location, impacts, or even that they had an opportunity to participate. This has direct implications for the fairness and completeness of the consultation process.

4. Consequences for Ecological Evidence and Public Participation

4.1 Missed opportunities for community-generated ecological evidence

Because many residents did not realise the true scale or location of the proposal until much later, they were unable to take part in early ecological surveys or share local knowledge that could have strengthened the environmental baseline. This meant people could not set up wildlife cameras, record seasonal flooding, document flora and fauna, or walk fields during key seasons.

Several Relevant Representations also raised concerns about the ecological surveys themselves, including limited coverage, poor timing, and lack of detail. In my own reading of the Applicant's ecological documents, I noted that some surveys appeared to have been carried out by less-experienced staff, which may help explain why certain ecological features were not identified.

4.2 A weakened environmental baseline

When you combine unclear public information, low early participation, and limited ecological engagement, it becomes difficult to feel confident that the Applicant's environmental evidence fully reflects what is actually on the ground. Michael William Eccles mentions, 'The council identified significant gaps in the ecological baseline data,'

4.3 A consultation process that did not meet the spirit of the Planning Act 2008

The Planning Act expects consultation to be transparent, accessible, meaningful, honest, and free from coercion. The concerns raised in the RRs make it reasonable to question whether those standards were met in this case.

Based on my own experience and the repeated themes in the Relevant Representations, I believe many residents would have been more vocal and more involved in the first consultation had the scale, locations, and physicality of the scheme been clearly presented from the outset.

5. Conclusion

Taken together, these concerns — unclear public information, accounts of pressure or inducements, and the absence of early community engagement — point to a pattern in how the Applicant has managed public-facing material. This pattern appears to have reduced early scrutiny, limited public understanding, and weakened the ecological evidence base. These matters go directly to the reliability of the Applicant's submissions and whether they can be treated as a full and accurate account of the scheme's impacts.

On this basis, and given the scale of land-take involved, I do not believe the Applicant has demonstrated that this scheme is an appropriate or proportionate response to the challenge of delivering Net Zero. I support the transition to low-carbon energy, but I believe it should be achieved through smaller-scale, locally integrated solutions such as geothermal, rooftop solar, brownfield development, and other decentralised technologies — approaches that strengthen communities rather than displacing them, and that do not require extensive, expensive new grid infrastructure or the industrialisation of rural landscapes. Large, dispersed solar schemes of this kind risk significant harm to environmental ecology, cultural ecology, and the wellbeing of rural communities, and their extensive groundworks and long grid connections can generate far more embodied CO_2 than smaller, decentralised alternatives.

For these reasons, and based on the evidence and patterns outlined above, I do not believe consent should be granted.

Respectfully,
Joan Bassler

Note regarding use of AI - In preparing this response, I used Microsoft Copilot as a drafting assistant to help refine wording, improve clarity, and ensure that my points were expressed in a structured and professional way. All arguments, evidence, interpretations, and conclusions are my own, and are based on my reading of the application documents, the Relevant Representations, and my knowledge of the local area. Copilot assisted only with phrasing and organisation; the substance of this submission reflects my own views and judgement.

Comment on Bat Survey Report: Environmental Statement Volume 3, Appendix 9-3

1. Introduction

I am not an ecologist, but I have read the Applicant's Bat Survey Report carefully, and as an ordinary resident trying to understand what has been done, I am left with serious concerns. The report contains repeated admissions that key surveys were not carried out, followed by explanations for why the Applicant considers these omissions 'proportionate.' When a technical report spends so much time justifying what has not been done, it raises doubts about whether the evidence is complete or reliable.

This Comment on RR highlights the issues I found in the Bat Survey Report, many of which are reflected in the Applicant's own words. My aim is to show where the information appears incomplete, inconsistent, or based on assumptions rather than actual survey data, and where it falls short of what would normally be expected in a professional ecological survey.

2. Failure to Meet BCT Survey Standards

The Bat Conservation Trust (BCT) makes clear that planning authorities must not determine applications without adequate bat surveys. Their public guidance states:

- 'Where there is a reasonable likelihood of bats being present and being affected by the development, surveys must be carried out before planning permission is considered.'
- 'The planning authority should not grant planning consent subject to future bat survey work as the findings of that survey might otherwise materially change the consideration of the development.'

Despite this, the Lime Down survey omits:

- winter surveys
- night-time walked transects
- emergence/re-entry surveys
- full tree inspections
- bat activity surveys along the 22 km Cable Route Corridor
- 17 ha of land entirely

These omissions mean the ecological baseline is materially incomplete and cannot reliably inform decision-making. More importantly, they reflect a wider pattern in the Applicant's approach: key elements of standard practice are left out, acknowledged, and then explained away. This tendency to justify incomplete information rather than address it is not compatible with the level of rigour expected in a professional ecological assessment, particularly for a scheme of this scale and sensitivity.

3. Over-Reliance on Static Detectors

Best practice requires a combination of static detectors and walked transects. Walked transects are essential for detecting:

- light-averse species (barbastelle, horseshoe bats)
- low-flying species
- commuting routes
- foraging hotspots

The Applicant used static detectors only. This approach systematically under-records the very species most sensitive to disturbance and lighting. The justification that walked transects were ‘disproportionate’ or would provide only a ‘glimpse’ is not supported by BCT guidance.

4. Missing Seasonal Coverage

The Applicant surveyed April–October only. They conducted:

- no winter activity surveys
- no hibernation roost assessments

This is despite:

- mature trees with potential roost features
- buildings with moderate roost potential
- woodland edges
- confirmed barbastelle activity

Winter surveys are required in such contexts. Their absence leaves a major gap in the baseline. Although some people assume bats simply ‘hibernate’ and are therefore irrelevant in winter, this is not the case. Many species remain active during milder periods, move between hibernation sites, or use different roosts and commuting routes in winter than they do in summer. Light-averse species such as barbastelle and horseshoe bats are known to use tree cavities, old buildings, underground features, and woodland edges during the winter months — all of which occur within the Lime Down site and the Cable Route Corridor. Without winter surveys, there is no information about whether these sensitive species are present, where they roost, or how they use the landscape at the time of year when they are most vulnerable to disturbance. This missing season means the ecological baseline is incomplete and cannot reliably inform assessment or licensing.

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5. No Emergence or Re-Entry Surveys

The Applicant identified buildings with moderate roost potential but carried out no dusk or dawn surveys. Daytime inspections alone cannot confirm absence. This omission means roost presence, type, and sensitivity remain unknown. Emergence and re-entry surveys are essential because they show how bats actually use the landscape: where they roost, how many bats are present, what species are involved, and how they move out into the surrounding habitat at night. Without this information, it is impossible to understand commuting routes, foraging ranges, or the functional connectivity of the site. In other words, without dusk and dawn surveys, the

relationship between bats and the wider landscape cannot be assessed, and the ecological baseline remains incomplete.

6. Incomplete Tree Surveys

The Applicant states that ‘trees were not inspected to the level of detail described for detailed GLTAs’ and that ‘individual PRFs were not systematically described and categorised.’ These are essential components of standard bat survey methodology. PRFs are the actual features where bats roost, and detailed GLTAs are the method used to identify and assess them. By not carrying out this work, the Applicant has effectively not assessed tree roosts at all. The attempt to justify this by claiming the survey ‘went above and beyond’ a Preliminary Ecological Appraisal is irrelevant, as a PEA is not an appropriate level of survey for determining impacts on protected species. The further claim that buffer distances in the design make detailed surveys unnecessary is not supported by BCT guidance: buffers cannot replace evidence, and roosts cannot be safeguarded if they have not been identified. Finally, the proposal to carry out proper surveys only ‘should any trees be impacted’ is contrary to BCT’s explicit instruction that planning authorities must not grant consent subject to future survey work. This paragraph therefore illustrates a wider pattern in the Applicant’s approach: required surveys are omitted, acknowledged, and then explained away, leaving the tree-roost baseline incomplete and unreliable.

This reinforces the wider pattern of incomplete survey effort and retrospective justification seen throughout the Applicant’s assessment.

7. No Surveys Along the 22 km Cable Route Corridor

The Applicant conducted no bat activity surveys along the Cable Route Corridor (CRC), despite:

- hedgerow crossings
- woodland edges
- watercourses
- dark corridors
- 17 ha of inaccessible land

Instead, they state that bat activity is ‘anticipated’ to be similar to the PV sites. This is an assumption, not evidence.

Where access was refused, the Applicant did not use:

- vantage point surveys
- boundary line surveys
- thermal imaging
- night-vision transects

BCT guidance requires reasonable alternatives. None were attempted.

8. Downplaying Activity Levels and Site’s Importance

The Applicant recorded:

- over 250,000 bat passes
- an average of 166 passes per night
- barbastelle hotspots
- lesser horseshoe hotspots
- Myotis species
- activity within the SAC Impact Zone
- a site "functionally linked" to the Bath & Bradford on Avon Bats SAC

Yet the report concludes that the site is of "Local Importance." This conclusion does not reflect the Applicant's own data. If the site is functionally linked to the Bath and Bradford on Avon Bats SAC, then its importance cannot be confined to the local level. Functional linkage means the site supports part of an internationally important bat population, and its ecological value therefore extends beyond the immediate area.

This is a clear misclassification of importance. Under the Habitats Regulations, land that contributes to the ecological function of an SAC cannot reasonably be described as only locally important. Downscaling the site to "Local Importance" is inconsistent with both the recorded evidence and the legal framework governing SAC species. This misclassification has significant implications, as it underestimates the site's sensitivity and reduces the level of survey effort and assessment that would normally be required for a site supporting an internationally important population.

9. A Pattern of Methodological Omissions

Across the Applicant's bat survey, there is a consistent pattern of methodological shortcuts, unsupported assumptions, and design-led reasoning that undermines confidence in the ecological baseline. The Applicant repeatedly acknowledges that key elements of BCT guidance were not followed — for example, 'trees were not inspected to the level of detail described for detailed GLTAs' and 'individual PRFs were not systematically described and categorised' — and then attempts to justify these omissions by asserting that 'buffer distances' in the design make detailed surveys unnecessary. Similar reasoning is used to avoid walked transects, winter surveys, emergence surveys, and all bat activity surveys along the 22 km Cable Route Corridor, including 17 ha that were never accessed at all. This pattern of selective effort and retrospective justification raises serious concerns about the reliability of the evidence base. A scheme of this scale cannot be examined on the basis of partial data and optimistic assumptions.

10. Misleading Reassurance in the Applicant's Justifications

Across the Bat Survey Report, the Applicant repeatedly acknowledges that required survey methods were not undertaken, but then provides technical-sounding explanations that downplay the significance of these omissions. This pattern of *misleading reassurance* gives the impression of thoroughness while masking gaps that materially affect the reliability of the ecological baseline.

For example, the Applicant admits that 'trees were not inspected to the level of detail described for detailed GLTAs' and that 'individual PRFs were not systematically

described and categorised,' yet immediately reassures the reader that the survey 'went above and beyond' a Preliminary Ecological Appraisal. A PEA is not the relevant standard for assessing bat roosts, and this comparison is therefore misleading.

A similar pattern appears in the justification for omitting walked transects. The Applicant acknowledges that BCT guidelines recommend that static detector surveys are augmented with manual surveys, yet they chose not to undertake any walked transects. Instead, they cite research papers showing that static detectors are effective for species detection, and then use this to justify omitting a required survey method. This is misleading. Static detectors and walked transects provide different types of data: static detectors record presence and general activity levels, while walked transects provide essential behavioural information, including commuting routes, foraging hotspots, and how bats interact with specific landscape features. These are critical for assessing impacts on light-averse species such as barbastelle and horseshoe bats. The Applicant's conclusion that a 'more complete and reliable baseline' could be achieved by relying solely on static detectors is not supported by BCT guidance or ecological best practice.

The same approach is used in relation to the updated BCT guidelines. The Applicant states that surveys continued using the 3rd edition 'to ensure consistency,' even though the 4th edition was published during the survey period. Consistency with outdated methods is not a valid justification for failing to follow current guidance, particularly where the updated guidelines strengthen requirements for tree-roost assessment, walked transects, PRF categorisation, and survey effort for sensitive species.

Finally, the Applicant repeatedly proposes to undertake proper surveys only 'should any trees be impacted.' This is contrary to BCT's explicit instruction that planning authorities must not grant consent subject to future survey work, as post-consent surveys cannot inform the assessment of impacts or licensing tests.

Taken together, these examples demonstrate a consistent pattern: omissions are acknowledged, then reframed as proportionate, consistent, or precautionary, even when they fall below current professional expectations. This approach undermines confidence in the completeness and reliability of the ecological baseline presented.

11. Use of Outdated Guidance Presented as 'Consistency'

The Applicant states that 'subsequent surveys continued using the 3rd edition methodology to ensure consistency across all surveys.' This is presented as a neutral or even professional decision, but it is misleading. The updated 4th edition BCT guidelines were published in September 2023, and the Applicant's survey work continued well beyond that date. Consistency with outdated methods is not a valid justification for failing to follow current guidance, particularly when the updated guidelines strengthen requirements for tree-roost assessment, walked transects, PRF categorisation, and survey effort for sensitive species such as barbastelle and horseshoe bats.

By continuing with 3rd edition methods, the Applicant avoided the more rigorous standards now expected for bat surveys. This sentence therefore reflects a wider

pattern in the report: omissions are acknowledged, then framed as reasonable or proportionate, even when they fall below current professional expectations. This approach risks giving the impression of thoroughness while masking gaps that materially affect the reliability of the ecological baseline.

12. Conclusion and Request to the Examining Authority

I respectfully ask the Examining Authority to consider whether the Bat Survey Report provides a complete and reliable baseline. I do not believe it does. Given the number of surveys not carried out, the reliance on assumptions, the absence of winter data, the lack of CRC activity surveys, and the presence of high-sensitivity species, I do not feel confident that the impacts on bats can be properly understood at this stage.

Before any conclusions regarding the scheme's potential impact on bats are drawn, I ask that the Applicant be required to provide:

- full bat activity surveys along the CRC
- winter surveys
- emergence/re-entry surveys for moderate-potential buildings
- updated tree surveys following 4th-edition guidance
- walked transects
- proper benchmarking of activity levels

When I look at the Applicant's behaviour across the whole process, a wider pattern becomes difficult to ignore. The land was assembled quietly, with lease agreements not made public until the acreage was large enough to move the scheme into the NSIP regime. Key documents have been unclear about the true physical scale and location of the scheme, and opportunities for early involvement by residents and other interested parties have been limited. In the environmental assessments, the same pattern continues: selective survey effort, hedging language, and repeated explanations for why standard practice was not followed.

Taken together, this does not give the impression of a developer taking a precautionary or transparent approach. It gives the impression of a company advancing a very large scheme despite significant gaps in the evidence base.

In my view, a project brought forward with such significant gaps in the ecological evidence base should not be granted consent. Proceeding without the missing surveys would place a large-scale industrial scheme onto well-loved countryside without a reliable understanding of the risks to protected species. That would not be a responsible basis for decision-making.

I respectfully ask the Examining Authority to require the missing surveys before any reliable assessment of ecological impacts can be made, and to consider whether the application can proceed in its current form without risking irreversible ecological harm.

Thank you for your time.

Joan Bassler

Note regarding use of AI: Copilot assisted me in preparing this Comment on RR by helping me organise and structure my concerns about the Applicant's Bat Survey Report. I drafted all substantive points myself, based on my own reading of the report, and Copilot helped me to:

- clarify the meaning of technical terms used by the Applicant
- identify where the Applicant's own statements indicated missing surveys or incomplete methods
- group related issues into clear sections (e.g., survey omissions, misleading reassurance, misclassification of importance)
- refine the wording so that my points were expressed clearly and in plain English
- ensure that my comments remained focused on the evidence presented in the Bat Survey Report

Copilot did not generate new ecological evidence or interpret raw survey data; it helped me express my own understanding of the Applicant's document more clearly and coherently.