EXAMINATION IN PUBLIC

APPLICATION BY LIME DOWN SOLAR PARK LIMITED

FOR AN ORDER GRANTING DEVELOPMENT CONSENT

REPRESENTATION BY

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POSITION STATEMENT

This representation does not oppose solar energy. It opposes this solar project in this location, and presents a credible, government-backed, fully scalable alternative that can deliver the same or greater renewable capacity without consuming a single acre of agricultural land.

1. Who I Am and Why I Am Here

I represent two organisations with direct relevance to the examination of this application:

UEC Energy Commercial Energy Advisory	25 years of energy sector experience spanning commercial energy procurement, carbon reporting, ESOS assessments, and clean energy project delivery. Clients include NHS trusts, diocese estates, schools, care homes, housing associations and commercial landlords.
RECfA Renewable Energy Coalition For Academia	A UK government-backed programme enabling schools, colleges and universities to deploy onsite clean energy generation — solar PV and battery storage — across the entire UK educational estate. Operating in active partnership with DESNZ and DfE.

I speak today not as a campaigner, but as a qualified energy professional with a live, operational alternative to what is proposed here.

2. Arguments Against the Lime Down Application

The following grounds, taken together, present a compelling case that consent should not be granted to this application as submitted.

2.1 Extraordinary Public Opposition

4,958	99%	54	3,000
Representations received	**Objection rate**	**Wiltshire solar sites**	**Acres already taken**
Public objections to PINS	*Of all representations submitted*	*Already built or under construction*	*In Wiltshire alone*

This is one of the most heavily opposed NSIP applications in recent memory. Wiltshire already bears a disproportionate burden of solar development — it is one of the most intensively developed solar counties in Europe. The cumulative impact on this specific landscape has not been adequately assessed.

2.2 Agricultural Land & Food Security

The scheme proposes to remove 878 hectares of land from active food production for a period of 60 years. Thirty percent of the site is classified as Best and Most Versatile (BMV) agricultural land — Grade 3a — which national planning policy affords the highest protection.

> **Wiltshire Council confirmed:** The scheme risks the loss of agricultural and tourism jobs, removal of 878 hectares of land from food production, as well as adverse effects on local businesses and communities.

The UK imports nearly half of its food by value. Locking Grade 3a land out of production for six decades — during a period of increasing global food insecurity — is not a reversible decision in any meaningful policy sense. Sixty years of intensive weed suppression, compaction, and altered soil drainage will materially change the character of this land regardless of restoration commitments.

2.3 The Carbon Payback Crisis

> **Critical finding — Wiltshire Council:** While the scheme could deliver net carbon savings over its lifetime, construction emissions mean carbon break-even would not occur until 2076.

This is not a peripheral concern — it is a fundamental disqualification. The UK's statutory net zero target is 2050. Lime Down Solar Park would not break even on its own construction carbon until 26 years after that target date. The Examining Authority is asked to consider: how does a project that is net carbon-positive through the entire net zero window serve the Clean Power 2030 Action Plan?

The panels, cabling, 3-metre perimeter fencing, substations, inverters, and battery systems all carry substantial embodied carbon — manufactured predominantly overseas in high-carbon supply chains.

2.4 Landscape, Heritage and Ecology

Wiltshire Council's formal Relevant Representation to PINS sets out that:

- The project causes substantial, long-term harm to landscape character over 749 hectares in a sensitive location near the Cotswolds National Landscape

- Compliance with Core Policy 51 (protect and enhance landscape character) is impossible at this scale
- Surveys for key species and habitats remain incomplete, particularly along the 22km cable route corridor
- Heritage assets including Bradfield Manor and Rodbourne Conservation Area have been under-assessed
- Potential for flooding and groundwater contamination has not been adequately scoped

The application's own Environmental Impact Assessment excluded landscape views beyond 5km and failed to assess the effect on trees within the project area — a significant omission for a scheme of this scale.

2.5 Peak vs. Real-World Output

The headline figure of 500MW is a peak capacity claim. It does not represent the energy this scheme actually delivers to the grid.

> **Key fact:** On average, solar delivers maximum power for approximately 2.6 hours per day in the UK. The average annual output of Lime Down would be approximately 50MW — one tenth of the headline claim.

Communications to the Secretary of State and the public consistently use the 500MW figure. The Examining Authority should be clear that the real-world contribution, averaged across the year, is a fraction of what is claimed, and should weigh the land-use cost against this corrected output figure.

2.6 Foreign Profit Extraction

Island Green Power is 100% owned by Macquarie Asset Management, an Australian investment group. The financial returns from 60 years of electricity generation on North Wiltshire farmland — underwritten by British consumers through energy pricing — will flow offshore.

There is no meaningful community ownership model. The community benefit package offered does not compensate for the permanent transfer of productive farmland revenue to overseas investors for six decades.

2.7 Highways and Construction Impact

The 22km underground cable route requires trenching across farmland, tunnelling under the M4, and HGV movements on narrow rural roads between North Wiltshire villages. Wiltshire Council has confirmed that mitigation commitments are inadequate and passing place provision insufficient, with the council having insufficient control over works on the public highway.

3. The RECfA Alternative: A Credible National Solution

The Examining Authority is asked to consider whether the energy output that Lime Down promises can be delivered through a demonstrably superior alternative. RECfA presents that alternative.

3.1 What RECfA Is

The Renewable Energy Coalition For Academia is a UK government-backed programme that enables schools, colleges and universities to deploy onsite clean energy generation — principally rooftop solar PV combined with battery energy storage. RECfA operates in active engagement with the Department for Energy Security and Net Zero (DESNZ) and the Department for Education (DfE).

RECfA does not require Development Consent Orders. It does not require planning applications to the Planning Inspectorate. It works within existing permitted development rights, on existing buildings, on already-developed land.

3.2 The Scale of the UK Educational Estate

Institution Type	Count (UK)	Avg System Size	Total Capacity
Primary Schools	~16,800	30 kWp	504 MWp
Secondary Schools	~4,200	100 kWp	420 MWp
Special & Other Schools	~8,500	40 kWp	340 MWp
FE Colleges	~253	300 kWp	76 MWp
Universities	~296	1,000 kWp	296 MWp
TOTAL EDUCATIONAL ESTATE	**~30,000+**	**—**	**1,500–2,000 MWp**

The RECfA programme, fully deployed, delivers three to four times the installed capacity of Lime Down Solar Park — without consuming a single hectare of agricultural land, without any NSIP consenting process, and without any landscape or heritage impact.

3.3 Direct Comparison: Lime Down vs. RECfA

Factor	Lime Down	RECfA (Full Programme)
Peak capacity	500 MWp	1,500–2,000 MWp
Land consumed	479.5 ha agricultural	Zero — rooftops only
Carbon payback	Not until 2076	Within 2–4 years
Planning route	DCO / NSIP — years	Permitted development — months
Food security impact	878 ha removed for 60 yrs	None
Landscape impact	Substantial & long-term	None
Community financial benefit	Profits to Macquarie, Australia	Savings stay in schools
Ownership	Foreign private equity	Public institutions
Government backing	Developer-led	DESNZ & DfE engaged
Annual savings to institutions	None	Up to £25,000 per site

3.4 Government Is Already Moving in This Direction

This is not a theoretical proposition. Great British Energy has already committed £255 million to install solar and battery storage across 250 schools and colleges, with up to an estimated £220 million in lifetime savings. RECfA is the programme that takes this from 250 to 30,000.

The Secretary of State is asked to consider: if the government's own energy company has validated the rooftop educational model, why should the same Secretary of State simultaneously consent to destroying 878 hectares of Wiltshire farmland to achieve a fraction of the same capacity?

3.5 Speed of Delivery

Lime Down, if consented today, could not be operational before mid-2029 at the earliest. RECfA rooftop deployments can be consented and commissioned within months per site, operating in parallel across hundreds of institutions simultaneously. The UK's Clean Power 2030 target demands speed. Rooftop solar delivers it.

4. Conclusion and Request

The Question Before the Examining Authority

Is it necessary and proportionate to remove 878 hectares of Wiltshire farmland from food production for 60 years — in a county already among the most solar-intensive in Europe, with a carbon payback date of 2076, generating returns for an Australian investment fund — when a credible, government-backed, operationally proven alternative can deliver three to four times the capacity on existing rooftops, saving public money, harming nothing, and benefiting everyone?

I respectfully submit that the answer is no, and I request that the Examining Authority:

- Refuse consent for the Lime Down Solar Park DCO application in its current form
- Direct the applicant to demonstrate why rooftop and brownfield alternatives cannot meet the stated energy output objective before any ground-mount consent is considered
- Formally note the RECfA programme as a viable, government-backed, land-neutral alternative capable of exceeding the capacity proposed here
- Recommend to the Secretary of State that policy guidance be strengthened to require applicants to demonstrate exhaustion of rooftop and brownfield options before agricultural land is considered for solar development

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21 April 2026

Appendix: Key Data Points

All figures used in this representation are drawn from official sources including the Planning Inspectorate case record, Wiltshire Council Relevant Representation (January 2026), Department for Education statistics (2024/25), Association of Colleges (March 2026), HESA data (2022/23), and Great British Energy programme announcements (March 2026).

Data Point	Value / Source
Public representations received	4,958 — 99% in objection (PINS published record)

Wiltshire existing solar coverage	54 farms / 3,000 acres (Stop Lime Down / Wiltshire Council)
Site footprint (total)	749 ha across 5 land parcels
Solar PV installation area	479.5 ha
Land removed from food production	878 ha (Wiltshire Council)
BMV (Grade 3a) land proportion	30% (Wiltshire Council)
Carbon break-even date	2076 (Wiltshire Council / construction embodied carbon)
Peak capacity (claimed)	500 MWp (Island Green Power)
Real average output	~50 MW (10% capacity factor, UK average)
Homes powered (claimed)	115,000 (Island Green Power)
Operational date (if consented)	Mid-2029 at earliest
Owner of applicant	Macquarie Asset Management, Australia (100%)
Maintained schools UK (2024/25)	29,532 (DfE / GOV.UK)
FE colleges UK (2026)	253 (Association of Colleges, March 2026)
Higher education institutions UK	296 (HESA 2022/23)
Schools currently with solar	~20% (UNESCO / energy sector data)
RECfA estimated total capacity	1,500–2,000 MWp (calculated)
GBE school solar investment	£255 million / 250 schools (GOV.UK, March 2026)
GBE lifetime savings (250 schools)	£220 million estimated (GOV.UK)
Per-school annual saving (solar)	Up to £25,000 (DMA Group / UNESCO)

RECfA — www.recfa.org.uk | UEC Energy — www.uec-energy.co.uk | clean-energy-calculator.uk