

Luckington and Alderton Parish Council's (LAPC) response to LDSP 'Applicant's Response to Relevant Representations' (Doc Ref: Exam/9.1). Planning Inspectorate Ref: EN 010168

(Approved by LAPC at Parish Council Meeting 8th April 2026 – [REDACTED])

**Comments of Luckington and Alderton Parish Council (Ref: [REDACTED])
in response to the Lime Down Solar Park Applicants document
'Response to Relevant Representations' (Part 1) (dated March 2026)**

We have now had the opportunity to review the 'Applicant's Response to Relevant Representations' (Part 1) (dated March 2026) and to consider their comments in reply to the 'Relevant Representations' submitted by Luckington and Alderton Parish Council.

We ask that the Planning Inspectorate exercise its discretion and please accept this LAPC response to the Applicant's Response to Relevant Representations (Doc Ref: Exam 9.1)

It is disappointing to see that the Applicant appears not to have read our Relevant Representations properly, as their responses erroneously refer to comments which were **not** made by this Parish Council, and rather than respond to the specific issues which we raised, the Applicant has relied on generic and non-specific responses, signposted to parts of the original documentation submitted by the Applicant, which we have already seen and disputed/object to. Simply reproducing earlier arguments in their original form is unlikely to be persuasive or effective.

The Applicant's document '**Applicant's Response to Relevant Representations (Doc Ref: Exam/9.1)** is inaccurate and littered with mistakes. In our view, the comments relating to LAPC's Relevant Representations cannot be relied on. The document exhibits an astonishing lack of due diligence and quality control. If the inaccuracies relating to LAPC are replicated in the rest of the document, it would appear to be unreliable and of little value. In our view, it should not be relied on.

For the reasons summarised below, Luckington and Alderton Parish Council continues to be firmly opposed to the proposed Lime Down Solar Park (LDSP) development. This response was approved at the Luckington and Alderton Parish Council Meeting on Wednesday 8th April 2026.

LAPC-001 Socio-Economics, Tourism and Recreation

The Applicant erroneously states that the comments/issues raise by this Parish Council were:

The huge number of workers on the site would impact on all the local residents which could impact on the already overstretched doctors and other local services.

What we actually submitted was:

The proposed Lime Down Solar Park encompasses over 2000 acres of rolling Cotswold landscape. It sits astride the historic Fosse Way Roman Road and there are numerous interesting archaeological and historical sites within the proposed development. It is a destination of recreational choice for visitors from far afield for cycling, driving, motorcycling, walking or horse-riding. Many local businesses are dependent on this for their customer base. We believe that it is likely that the excessive scale of the proposed development will severely

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curtail the attractiveness and viability of these activities in the future. This is likely to be particularly severe during the highly disruptive 2-year construction period, and their recovery after that must be considered very doubtful. We do not feel that the developer has given this sufficient weight, nor adequately addressed these important concerns.

The Applicant's Response was:

Impacts on local services as a result of construction workers for the Scheme have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and in ES Volume 1, Chapter 18: Human Health [APP-070]. The assessment of socio-demographic changes as a result of inbound construction workers has determined that there are no significant adverse effects to the socio-demographic environment (age, health, disability, access to housing) as the inbound construction workforce are anticipated to be largely temporary, and accommodated in hotels across a 20 km Study Area. As such, impacts on access to services are likely to be spread across a large area, with the maximum population uplift over this area expected to be approximately 0.054%. With respect to access to service including health services, the assessment in ES Volume 1, Chapter 18: Human Health [APP-070] considers the likely health requirements for onsite workers to access general practice healthcare and emergency healthcare. Ignoring that temporary inbound workers are anticipated to be accommodated within 20 km of the Scheme, the additional workforce associated with inbound workers (+412) is equivalent to approximately 0.3% of the patient list of GP practices within 5 km of the Scheme. This is therefore not a substantial increase, and is not likely to have any significant effect on health and wellbeing of existing residents.

LAPC Comment:

The Applicant has ignored our submission, failed to answer any of the issues we raised in it, and has provided a detailed response relating to irrelevant other issues we have not raised. Perhaps this is an indicator of their lack of attention to detail and the unreliability of their written submissions?

LAPC-002 Ecology and Diversity

The Applicant erroneously states that the comments/issues raise by this Parish Council were:

The environmental impact on the local countryside is unacceptable with potential impact on local wildlife, heritage features and the scale of the infrastructure.

What we actually submitted was:

Impact on wildlife, fauna, flora and local environment:

Previous solar industrial projects have been built on a scale which has allowed local mitigation measures to successfully address many of our concerns regarding the impact on wildlife, fauna,

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flora and local environment. The proposed Lime Down Solar Park is of a much larger order of scale. We are concerned that the previously used mitigation measures are not scalable to be effective in protecting the significant diversity and density of wildlife, fauna and flora within the proposed development site, nor can they adequately protect the local environment from contamination and destruction when the development is of such a large industrial magnitude.

The Applicant's Response was:

As per the description set out in ES Volume 1, Chapter 3: The Scheme [APP-055] the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land. managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.

LAPC Comment:

The Applicant has ignored our submission, failed to answer any of the issues we raised in it, and has provided a detailed response relating to irrelevant other issues we have not raised. Perhaps this is an indicator of their lack of attention to detail and the unreliability of their written submissions?

LAPC-003, LAPC-004 and LAPC-005 Hydrology, Flood Risk and Drainage:

The Applicant appears to be confused by our submissions relating to Hydrology, Flood Risk and Drainage. They have split our comments into three separate heading of LAPC-003, LAPC-004 and LAPC-005. It is unclear why this has been done.

What we actually submitted was:

We believe that the area covered by the proposed Lime Down Solar Park development, in common with many other parts of the UK, has seen an increase in significant weather events, particularly storms and associated high risk flooding events during recent years. This has resulted in many severe flooding events development site, and we are concerned that this increasing risk has not been adequately considered nor has it triggered appropriate mitigation proposals from the developer. This omission has potentially severe consequences for the wider community within the Bristol Avon catchment area and should be properly addressed.

Flooding and Drainage:

The area of the proposed Lime Down Solar Park is vast. It sits astride and encompasses a large part of the headwaters of the Bristol Avon river. The surface water which falls on the proposed

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development area either flows overground to the rivers, or through the subsoil or down to the aquifers to reach the Luckington Avon, Sherston Avon or Gauzebrook tributaries and onwards to the Bristol Avon. All of these tributaries and rivers suffer severe flooding, which significantly impacts the downstream conurbations of Malmesbury, Chippenham, Melksham, Trowbridge, Bradford on Avon, Bathford, Bath and Bristol.

The proposal includes enormous impermeable motorised solar panels erected above ground level, and with large impermeable battery and transformer installations. However these are constructed, they will inevitably speed up run off, alter the ways in which water enters the subsoil and aquifers, and erode/redirect surface water flows. The local waterways and fields frequently flood, blocking roads and damaging property. Changing this is highly likely to make matters much worse, yet these implications have been inadequately considered in the application.

Irrespective of the limited mitigation measures proposed on-site by the developer, any water falling on, or passing through the development area will inevitably enter the River Avon at some point, yet the developers have dismissed the off-site flooding implications of this development as being unimportant. We feel this position is ill-judged and incorrect. The scale and extent of the proposed Lime Down Solar Park represent a very significant potential flooding threat to all of the land, housing and businesses downstream of the site along the whole catchment of the River Avon. The developers' proposals fail to adequately consider or mitigate for this substantial threat.

The Applicant's Response was:

LAPC - 03

The Applicant does not agree that the solar PV arrays are enormous impermeable or materially alter groundwater recharge. The assessment in ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063] explains that panels are elevated and configured such that rainfall drains to ground beneath and between panels, maintaining existing drainage pathways. The existing baseline comprises intensively managed arable land subject to trafficking, compaction and periods of bare ground, and the Scheme introduces permanent grass cover and reduced soil disturbance which improves infiltration capacity and soil structure relative to the baseline. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75).

The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime.

The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

The Outline Construction Environmental Management Plan (CEMP) [APP-277] has been developed to control construction phase risks and ensure there is no material increase in off-

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site flood risk. The Outline CEMP will be secured via Requirement 13 of the Draft DCO [APP-016].

LAPC – 04

The Applicant acknowledges that runoff from the Site contributes to the Luckington Avon, Sherston Avon and Gauze Brook tributaries and subsequently to the Bristol Avon catchment. An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063], with supporting information provided in ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218].

The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime.

The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

The Outline Construction Environmental Management Plan (CEMP) [APP-277] has been developed to control construction phase risks and ensure there is no material increase in off-site flood risk. The Outline CEMP will be secured via Requirement 13 of the Draft DCO [APP-016].

LAPC – 005

The Applicant does not agree that the solar PV arrays are enormous impermeable surfaces that inevitably speed up run off or materially alter groundwater recharge. The assessment in ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063] explains that panels are elevated and configured such that rainfall drains to ground beneath and between panels, maintaining existing drainage pathways. The existing baseline comprises intensively managed arable land subject to trafficking, compaction and periods of bare ground, and the Scheme introduces permanent grass cover and reduced soil disturbance which improves infiltration capacity and soil structure relative to the baseline. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75).

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site flood risk. The Outline CEMP will be secured via Requirement 13 of the Draft DCO [APP-016].

LAPC Comment:

The solar panel which the Applicant proposes to instal across the proposed Lime Down Solar Park site are amongst the largest ever installed in the UK. These panels, by definition, are built to be watertight, so in any attitude other than vertical they will impact on the way in which rainfall will reach the ground. Since these panel are each similar in size to a double-decker bus, and they will be deployed over such a large site, we feel it is inevitable that they will significantly change the way in which rainfall will enter the ground. We have been told by the Applicant that the largest panels will be 'docked' in the horizontal position at night to minimise their height, but this will also be the position of maximum interference with rainfall. The 'run-off' of rain from the panels will also cause 'hard-panning' around their periphery, where the run-off water lands on, and this will have an impact on the way in which rainfall infiltrates and traverses the ground, increasing the speed of the run-off. The Lime Down proposal is of a significantly larger magnitude than previous UK installations, but no evidence is offered by the Applicant to support their assumption that the effects of the larger panels will be like the effects of the previous installed smaller panels. We think their assumption is flawed and should only be accepted if supported by credible research evidence rather than just assumptions. None has been provided.

We do not agree with the Applicant's assertion in respect of off-site flood risk. In our view, the Applicant's Flood Risk Assessment is flawed and do not give adequate weight to the off-site impacts of the proposed on-site installations. It is systemically focussed on protecting the Applicant's on-site assets and gives little, if any, consideration to the potential risks and impacts on the local community or those downstream in the River Avon catchment area.

The Applicant also refers to several documents (such as '*Statement of Common Ground to be submitted at Deadline 1*' and '*The Outline Construction Environmental Management Plan*', which are not yet in the public domain and are not available to this Parish Council. In light of the superficial detail already supplied by the Applicant, the inaccuracies and mistakes evident in previous submissions by the Applicant, we have no confidence in the Applicant's statement that future documents will adequately address or allay our concerns.

In summary, we are still of the opinion that, irrespective of the limited mitigation measures proposed on-site by the developer, any water falling on, or passing through the development area will inevitably enter the River Avon at some point, yet the developers have effectively dismissed the off-site flooding implications of this development as being unimportant. We feel this position is ill-judged and incorrect. The scale and extent of the proposed Lime Down Solar Park represent a very significant potential flooding threat to all of the land, housing and businesses downstream of the site along the whole catchment of the River Avon. We feel the developers' proposals fail to adequately consider or mitigate for this substantial threat.

We are not persuaded by the Applicant's response to the concerns we raised, we remain firily opposed to the proposed Lime Down Solar Park development and wish to re-iterate our view that the Applicant's proposal represents a very significant potential flooding threat to all of the land, housing and businesses downstream of the site along the whole catchment of the River

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Avon. The developers' proposals fail to adequately consider or mitigate for this substantial threat.

LAPC – 006 Human Health:

The Applicant states that the comments/issues raise by this Parish Council were:

Drinking Water: The proposed development site sits over the extensive and highly sensitive and vulnerable Oolitic limestone aquifers. These are an important source of safe drinking water for an extensive geographic area. The proposals lack essential details, but we are concerned that the proposed location and construction of the solar panel installations, transformers and other installations, alongside the proposed BESS - battery facilities represent a significant threat of pollution, fire risk (with elevated pollution risk from contaminated water). This risk is likely to be particularly high during the construction and commissioning phase of the proposals, yet there is little detail in the proposals, and what is presented is wholly inadequate and offers no realistic mitigation options. We should not be risking such an important source of drinking water in this way.

This is an accurate reproduction of our 'Relevant Responses' comment.

The Applicant's Response was:

The Applicant does not agree that the Scheme presents a significant pollution threat to drinking water supplies or that mitigation is inadequate. Groundwater receptors, including the underlying aquifers, are assessed and controlled within ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063] and ES Volume 1, Chapter 19: Ground Conditions [APP-071], which consider construction and operational pollution pathways and set out embedded and additional mitigation to avoid significant adverse effects on controlled waters.

Potential pollution risks associated with hardstanding areas for supporting electrical infrastructure, including BESS and substations, are managed through the principle of controlled drainage and pollution prevention measures, with detailed design and operational controls secured through Requirements 5 and 14 of the Draft Development Consent Order [APP-016], including emergency response provisions to prevent uncontrolled release of contaminated liquids.

Construction phase risks, including during commissioning, are managed through secured pollution prevention and incident response measures within the Outline CEMP [APP-277]. No amendments to the application documents are required.

LAPC Comment:

Again, re-stating the contents of the Applicant's earlier submissions is unhelpful. We have already commented on them, and we found them to be unpersuasive, lacking essential detail and inadequate in respect of the potential threat to an essential drinking water source. The Applicant does not demonstrate any detailed understanding of the unique underlying geology

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and geomorphology of the proposed development area, rather than they have rendered a simplistic version of this, which more readily suits their needs. This causes us concern.

The Applicant also refers to documentation which is not in the public domain and is unavailable to the Parish Council to consider. That does not assist in making their case.

We do not agree with the Applicant's assertions in respect of off-site risk to drinking water sources. In our view, the Applicant's Drinking Water Assessment is flawed and does not give adequate weight to the off-site impacts of the proposed on-site installations. It is fundamentally focussed on the Applicant's on-site assets and gives little, if any, proper consideration to the potential risks and impacts to the subterranean aquifer drinking water supplies.

The Parish Council continues to believe that the Applicant's proposals fail to address the risks to the drinking water supply, and we oppose the Application accordingly.

LAPC – 007 Landscape and Visual:

The Applicant states that the comments/issues raised by this Parish Council were:

Landscape and Visual: The proposed Lime Down Solar Park development sits adjacent to the southern boundary of the Cotswolds National Landscape (CNL) (formerly ANOB), and much of the proposed development will be easily visible from within the CNL. The developer is proposing the use of enormous 4.5m motorised solar panels, which are ugly, impossible to effectively conceal within the iconic Cotswolds landscape, and noisy. Some of the other installations are intended to be over 7m high. The local landscape is such, that despite the developer's best efforts to conceal them from view, they are likely to be visible from over 20 miles away. This gently rolling, picturesque landscape, with its characteristic far reaching views simply cannot be made to 'hide' industrial facilities. They will be simply lost forever, and the suggestion that the area could be years of industrial use is simply not credible.

This is an accurate reproduction of our 'Relevant Responses' comment.

The Applicant's Response was:

The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation.

The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining

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SQs. There are some Minor/Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 – An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL.

The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation.

Details of the proposed landscape and ecological mitigation and enhancement measures are provided in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and the Outline Landscape and Ecological Management Plan (OLEMP) [APP-283], and the Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284].

The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in ES Volume 1, Chapter 3: The Scheme [APP-055]. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The landscape and visual effects of the Scheme, including the effects of the maximum panel height, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060].

The LVIA assesses effects on identified landscape and visual receptors during construction, operation and decommissioning, using the maximum design parameters to ensure a robust assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and detailed within the Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time.

The noise impacts from the operation of the Scheme and its components are assessed in section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [APP-066], with supporting modelling provided in ES Volume 3, Appendix 14- 4: Noise Modelling [APP-237]. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive

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nature of the sound. Potential mitigation measures are detailed in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [APP-066], and with such measures in place, significant effects from operational noise are not expected.

The Outline Operational Environmental Management Plan [APP-278] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved.

The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the OLEMP [APP-283], are secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [APP-016]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the EPMS [APP-284], are secured through Requirement 8 in Schedule 2 of the Draft Development Consent Order [APP-016]. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. Measures to manage decommissioning and reinstatement are set out in the Outline Decommissioning Strategy [APP-279], which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the Outline Decommissioning Strategy [APP-279] and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the Draft Development Consent Order [APP-016]. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the Draft DCO [APP-016].

LAPC Comment:

The Applicant has again re-iterated their previous documentation, and but offered little, if any, additional information to address the concerns we raised in our 'Relevant Representations'. The Applicant is still proposing the use of the enormous 4.5m motorised solar panels, which are ugly, impossible to effectively conceal within the iconic rolling Cotswolds landscape, and noisy. Some of the other installations are intended to be over 7m high. The local landscape is such, that despite the developer's best efforts to conceal them from view, they are likely to be visible from over 20 miles away. The mitigation measures offered by the Applicant are inadequate. This gently rolling, picturesque landscape, with its characteristic far reaching such enormous industrial facilities. They will be simply lost forever, and the suggestion that the area could be years of industrial use is simply not credible.

The Applicant also refers to documentation which not in the public domain and is unavailable to the Parish Council to consider. That does not assist their case. In view of previous issues in respect of detail and accuracy in the Applicant's submission, we do not feel able to rely on the Applicant's reassurance as to their intended contents.

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In the absence of any new meaningful information from the applicant, we remain opposed to the Applicant's proposals, as previously stated. They have offered nothing meaningful to address our documented concerns.

LAPC – 008 Transport and Access:

The Applicant states that the comments/issues raise by this Parish Council were:

Transport: The resident of the hamlets, villages and towns of North Wiltshire frequently use Chippenham for essential local services including medical facilities, hospitals, dentistry, pharmacy, retail and service provisions. There is little public transport in the area and all road routes from these settlements to Chippenham pass through the proposed Lime Down Solar Park development area. Many of these routes are unsuitable for large goods vehicles or safe two-way travel. Almost all of these routes are intended for use as 'access routes' by the large numbers of site vehicles associated with the development. The routes are already busy, frequently disrupted by accidents, flooding and other road incidents, and the consequential delays are problematic for the communities involved. The duration of the prolonged (2 year) construction period, together with the size and number of vehicles movements involved in the construction, will cause the local community unacceptable disruption and hardship. It may even lead to members of the community being unable to access essential services in a timely manner. The local road network is inadequate and cannot adequately absorb the proposed construction traffic, even with the limited 'improvements' the developer has proposed seem to largely consist of removing 'inconvenient' road furniture. The so-called furniture (much of which is in place for sensible safety reasons) for the duration of the 2-year construction period. This is ill-considered and inappropriate. Oversized vehicles travelling in narrow rural lanes, wholly inadequate counter measures and the removal of important roadside safety furniture (for a very protracted period) will significantly increase the risks for those using these roads.

This is an accurate reproduction of our 'Relevant Responses' comment.

The Applicant's Response was:

The assessment presented in Annex H of ES Volume 3, Appendix 13-1: Transport Assessment [APP-233] demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review -

Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the OCTMP [APP-287], a booking system will be set up to manage arrivals and departures to the Order Limits.

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This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes (including this route) and will be confirmed as part of the final CTMP. excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: temporary nature of the construction period; trip generation of is an estimate of the deliveries on a peak day, so does not represent a daily average; trip generation is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; delivery times during the construction phase are limited to those times set out in the OCTMP [APP-287]. There will be no HGV construction trips outside of these hours; and there would be a much greater impact on hedgerow, trees and character; To provide further comfort, additional information has been added to ES Volume 3, Appendix 13-1: Transport Assessment [APP-233] which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs. Further detail of trip generation has also been added to ES Volume 3, Appendix 13-1: Transport Assessment [APP-233] which will be submitted at Deadline 1 of Examination.

LAPC Comment:

The Applicant again refers to documentation which not in the public domain and is unavailable to the Parish Council to consider. In view of previous issues in respect of detail and accuracy in the Applicant's submission, we do not feel able to rely on the Applicant's reassurance as to their intended contents.

At this stage, In the absence of any new meaningful information from the applicant, we remain opposed to the Applicant's proposals, as previously stated. They have offered nothing meaningful to address our documented concerns.

The Applicant seems to be very reliant on the currently unavailable 'Transport Assessment' to be submitted by Deadline 1. We await this document with interest and will review our position when this is available.

LAPC – 009 Other Environmental Matters

The Applicant states that the comments/issues raise by this Parish Council were:

BESS - Battery Storage: The battery storage facilities planned as part of the Lime Down Solar Park proposals causes us much concern. They are intended to be located in close proximity to surface water sources and above the sensitive underground vulnerable aquifers, which are an important source of drinking water for a very large geographic area. The proposals lack essential details, but we are concerned that the proposed location and construction of these battery installations represent a significant threat of pollution, fire and noise. We are concerned that the developers proposed mitigation measures will prove completely inadequate in light of the challenging local conditions.

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This is an accurate reproduction of our 'Relevant Responses' comment.

The Applicant's Response was:

The assessment of likely impacts to human health from BESS fires and noise in ES Volume 1, Chapter 18: Human Health [APP-070] has been directed by the assessment of noise, hydrology, flood risk and drainage, and ground contamination, as set out across the relevant technical chapters of the ES. Furthermore, adverse impacts to people and the environment from the BESS are directly controlled through the mitigation measures set out in the Outline BSMP [APP-286], which is secured by Requirement 6 in Schedule 2 to the Draft DCO [APP-016]. No significant adverse effects to human health are assessed as anticipated to occur.

An assessment of potential contamination risks is provided in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063] and ES Volume 1, Chapter 19: Ground Conditions [APP-071], which consider risks to surface water, groundwater and sensitive receptors during construction, operation and decommissioning of the Scheme. These assessments conclude that, with appropriate mitigation and management measures in place, no significant contamination effects are anticipated. The Applicant notes that the approach to risk of contamination of groundwater and surface water has been agreed with Wiltshire Council and is under discussion with the Environment Agency and is set out in the relevant Statement of Common Ground with Wiltshire to be submitted at Deadline 1 and will be included in a future Statement of Common Ground with the Environment Agency.

Mitigation and management measures to protect water and ground conditions are set out in the Outline CEMP [APP-277] and supporting management plans. These include pollution prevention controls, containment measures, emergency response procedures, and site-specific drainage design. In particular, drainage within substation and Battery Energy Storage System (BESS) areas will incorporate lined drainage and automatically actuating shut-off valves to contain any accidental spills or firewater, preventing release to surrounding land or watercourses.

An Outline Battery Safety Management Plan (OBSMP) [APP- 286] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated

LAPC Comment:

The response by the Applicant only refers to their previously submitted documentation and references the contents of other documents which are not yet in the public domain and are unavailable to this Parish Council. In the absence of any new meaningful information from the Applicant, our position remains unchanged and we still oppose the Application on the grounds that the battery storage facilities planned as part of the Lime Down Solar Park are intended to be located in close proximity to surface water sources and above the sensitive underground vulnerable aquifers, which are an important source of drinking water for a very large geographic area). The proposals still lack essential details, and we are concerned that the proposed location and construction of these battery installations represent a significant threat of pollution, fire and noise. We are concerned that the developers proposed mitigation measures will prove completely inadequate considering the challenging local conditions.

LAPC – 010 Loss of Agricultural Land:

The Applicant states that the comments/issues raise by this Parish Council were:

Loss of Agricultural Land: The proposed Lime Down Solar Park encompasses an area of over 2000 acres of productive agricultural land, with much of it believed to be BMV (Best Most Valuable Land). We feel that the loss of such a large tract of land, currently under agriculture, is ill-advised and inappropriate. At a time when food security is so important, valuable agricultural land should not be used for this industrialised purpose. The Lime Down Solar Park proposal is for the site to be in use for 60 years. In reality, this agricultural land will be lost forever, and the suggestion that the area could be returned to its present productive agricultural use after 60 years of industrialisation is simply not credible. This is accurate.

The Applicant's Response was:

The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in ES Volume 1, Chapter 17: Soils and Agriculture [APP 069], supported by ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered high quality agricultural land in planning terms. Government led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated.

The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the Outline Decommissioning Strategy [APP-279], post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

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LAPC Comment:

The response by the Applicant refers to their previously submitted documentation and helpfully references the contents of other accessible documentation. However, this Parish Council is not in agreement with their conclusions and the opinions that they draw from these sources. This Parish Council remains opposed to the scheme, as we feel that the Applicant's assertions lack credibility and are unlikely to be fulfilled.

LAPC – 011 Ecology and Diversity:

The Applicant states that the comments/issues raise by this Parish Council were:

Impact on wildlife, fauna, flora and local environment: Previous solar industrial projects have been built on a scale which has allowed local mitigation measures to successfully address many of our concerns regarding the impact on wildlife, fauna, flora and local environment. The proposed Lime Down Solar Park is of a much larger order of scale. We are concerned that the previously used mitigation measures are not scalable to be effective in protecting the significant diversity and density of wildlife, fauna and flora within the proposed development site, nor can they adequately protect the local environment from contamination and destruction when the development is of such a large industrial magnitude.

The Applicant's Response was:

Potential impacts of the Scheme on ecology and biodiversity are assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061], which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated.

Mitigation measures are detailed in the Outline Landscape and Ecological Management Plan (OLEMP) [APP-283] and the Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284], which set out habitat and species protection measures, buffer zones, monitoring and long-term ecological management. The prescribed measures are based on best-practice guidance and experience from numerous other schemes of a similar nature. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the OLEMP [APP-283], are secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [APP-016]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the OEPMS [APP-284], are secured through Requirement 8 in Schedule 2 of the Draft Development Consent Order [APP-016]. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.

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LAPC Comment:

This is accurate, in terms of Ecology and Diversity comments made by LAPC. However, these comments have already been responded to in LAPC – 002, and this seems to be a confusing and unnecessary duplication within the Applicant's documentations. The LAPC comments posed in both LAPC - 002 and LAPC- 012 are the same, but the responses by the Applicant in LAPC – 002 and LAPC – 012 are different. This appears to be a further example of the Applicant's inconsistent document and project control processes, leading to unnecessary confusion for the public and a lack of clarity over the proposals. It does not give the Parish Council confidence in the Applicant's ability to deliver the project in accordance with their documented proposals.

The response by the Applicant refers to their previously submitted documentation and helpfully references the contents of other accessible and inaccessible documents. However, this Parish Council is not in agreement with their conclusions and the opinions that they drawn from these sources. This Parish Council remains opposed to the scheme, as we feel that the Applicant's assertions lack credibility and are unlikely to be fulfilled.

LAPC – 012 Consultation and Engagement:

The Applicant states that the comments/issues raise by this Parish Council were:

Adequacy of Consultation: Throughout the pre-application consultations, the developer of the Lime Down Solar Park proposals has appeared dismissive of local concerns, failed to provide additional information requested by the local community, and sought to make it difficult for many within the local community to engage with the developer and make their voices heard. This was particularly the case with the 'Targeted Consultation', where many of those directly affected by the traffic proposals were not adequately informed of the developer's intentions and subsequently felt they had been excluded from the consultation process.

The Applicant's Response was:

The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Consultation Report [APP-022] sets out the Applicant's approach to pre-application consultation. The Applicant considers that the general public was provided with a proportionate and reasonable opportunity to provide feedback on the changes that formed part of the Targeted Consultation, which was undertaken in accordance with the relevant principles as set out in the Statement of Community Compliance. A draft of the SoCC was shared with Wiltshire Council for feedback, and Wiltshire Council confirmed in its Adequacy of Consultation Representation that the approach set out in the SoCC was sufficient. As set out in the Consultation Report [APP-022], a draft of the Applicant's proposed approach to Targeted Consultation was shared with Wiltshire Council and South Gloucestershire Council, and feedback was provided and incorporated before the Targeted Consultation period commenced. The Applicant also notes that the examination process

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provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an independently appointed Examining Authority. Further to this, the Applicant provided an extended relevant representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an interested party.

LAPC Comment:

Unsurprisingly, the Applicant suggests that they did a good and proportionate consultation with the public regarding their application and the proposals for Lime Down Solar Park (LDSP). We disagree.

We have received numerous complaints from within our community that the LDSP publicity, contact and consultation failed to reach all parts of the affected communities. It excluded certain sections of the community and was overly reliant on online participation (which necessarily excludes certain sections of the community). The traffic management plan (Targeted Consultation) was a particularly contentious and a source of huge local concern, yet it was specifically run on a tight timescale and directed at statutory consultees, not the wider public. It was not widely publicised within the local communities, or those road users who regularly transit across the affected area. It appeared to discourage general public involvement.

Our views remain unchanged. The Applicant has appeared dismissive of local concerns, failed to provide additional information requested by the local community, and sought to make it difficult for many within the local community to engage with them to make their voices heard. We are of the opinion that this was particularly the case with the 'Targeted Consultation' phase, where many of those directly affected by the traffic proposals were not adequately informed of the developer's traffic plans. They still feel that they have been excluded from the consultation process. We object to the Applicant's proposals on this basis.

LAPC – 013 Cumulative Effects:

The Applicant states that the comments/issues raise by this Parish Council were:

Cumulative Effect: Over recent years, the North and Central areas of Wiltshire have seen too many solar panel generating installations approved and built, and the area has been overly developed in this regard. The Lime Down Solar Park proposal is on a much larger scale and is a step too far. It will damage the iconic Cotswolds landscape and rural environment to an unacceptable degree. This is accurate.

The Applicant's Response was:

A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within ES Volume 1, Chapter 21: Cumulative and In combination Effects [APP-073] and associated Appendices [APP- 264]. Interaction with

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proposed or consented but not yet built developments has been fully explored within each of the technical assessments [APP-059 - APP-072] with a summary of each of these assessments provided within ES Volume 1, Chapter 21 In-Combination and Cumulative Effects [APP- 073]. Existing schemes are captured within the baseline environment. The four stage cumulative assessment methodology is described within ES Volume 1, Chapter 6: EIA Methodology [APP-058]. 358 developments were included in the ES Volume 3, Appendix 21-1: Long List [APP-264]. 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant residual cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT[CORM]122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]. These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084] and detailed in the Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]. Such measures have been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.

LAPC Comment:

We disagree with the Applicant's response, they offer nothing new and, after reviewing our position, we wish to re-iterate that this proposal represents a step too far. The North and Central areas of Wiltshire have seen too many solar panel generating installations approved and built, and the area has been overly developed in this regard. The Lime Down Solar Park proposal is on a much larger scale and will damage the iconic Cotswolds landscape and rural environment to an unacceptable degree. Therefore, we oppose this development.

LAPC – 014 Community Benefits:

The Applicant states that the comments/issues raise by this Parish Council were:

Community Benefits: The proposed Lime Down Solar Park development offers no benefits whatsoever to the local community (unlike many other similar local scale, size, proposed cable route and use of overly large solar panels and other associated installations will destroy many of the local assets and amenities already used by both local community and the large number of leisure visitors to the area. This represents a significant loss to the community, yet the developers offer nothing in mitigation or other consideration.

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The Applicant's Response was:

Of particular relevance to the assessment of effects on local communities are ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Chapter 13: Transport and Access [APP-065], Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070], all of which consider potential impacts on residential properties and local communities.

The Scheme is anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities and providing skills and training opportunities.

Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements.

That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme.

The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent.

LAPC Comment:

Whilst the Applicant expresses laudable intentions, we feel the supposed benefits to be felt within 20 miles are unlikely to be realised. The area is already criss-crossed with a comprehensive network of well used public footpaths, and a few additional 'permissive paths' lacks the secure permanency of enshrined public rights of way. The actual benefits they will incur (amongst 4.5m) panels and high vegetation are questionable.

The Applicant's suggestion of the Community Benefit Scheme is typical of many of their offerings during the consultation process. It is not tangible, isn't defined and may never appear unless the Applicant wants it to. Their suggestion also implies that the Applicant will determine what parts of the community 'benefit' from the scheme. Surely, it would be better if such a scheme were run and determined from within the community itself?

Sadly, this seems to be indicative of the approach the Applicant has taken towards the local communities throughout the 'Consultation' and the 'Application' process. They do not appear to want to meaningfully engage with the local communities, just impose their plans on the affected local communities, irrespective of the views of those communities.

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Luckington and Alderton Parish Council - Summary:

The responses from the Applicant in Document Ref Exam/9.1, largely restate their existing case and offer little new information. Nothing has changed, Luckington and Alderton Parish Council remain opposed to this proposed development for the reasons previously stated in our submissions.