

Lime Down Preliminary Meeting Open Floor Hearing IP Ref No [REDACTED]

I am a professional ecologist with over 40 years' experience including 25 years as a senior national conservation advisor with the EA and ten years as a Board member for the UK River Restoration Centre. I have been an advocate for renewable energy over that time. However, the remote location, large scale and dispersed nature of the LimeDown proposal raises significant environmental concerns which have been consistently downplayed.

Foremost amongst these is the likely impact on the water environment. The UK is experiencing significantly wetter winters as a result of climate change, so the construction and decommissioning operations would inevitably cause soil compaction and loss over a very large area. The hydrological regimes of watercourses running through the proposed solar sites would be significantly altered, making them much flashier and more prone to both flooding and drought. Soil compaction is notoriously difficult to remediate and would not be achieved by the growth of grass alone.

Flooding is already a significant issue in Corston, where a local proposal for nature-based solutions to slow the flow and reconnect the Gauze Brook with its floodplain would be compromised by the installation of panels. The Upper Bristol Avon catchment suffers from over-abstraction, low summer flows and diffuse pollution – all problems that would be exacerbated should this proposal be given consent. The EA is so concerned about the possibility of diffuse pollution that they have requested a Soil Resources Management Plan and more water quality mitigation measures.

Another main concern stems from the evident confusion over what measures constitute mitigation, what measures are compensation and what will deliver net gain; and on the unrealistic nature of the proposed measures. It is extremely difficult to establish species-rich grassland on former arable land, and beneath and between solar panels. The areas proposed for grassland creation do not form a coherent block of land that would be easy to manage over the long term, whilst the difficulty of obtaining sufficient seed of local provenance is never acknowledged. The mitigation measures proposed for reducing visual effects are heavily reliant on tree and shrub planting, with similar challenges in sourcing locally grown, disease-free and locally appropriate nursery stock in the required quantities. Recent NSIPs have recorded heavy losses (30-70%) due to drought and high summer temperatures.

The Planning Inspectorate is being asked to consider the environmental impact of the scheme without fundamentally important detailed information. There are so many omissions and uncertainties that it is impossible to accurately determine and quantify the overall environmental impacts. There is a very low level of ambition regarding Biodiversity Net Gain –British Solar Renewables have adopted a minimum target of 60% BNG, with many sites on track to deliver 200%. Such targets would be easily achieved on land that has been intensively farmed for many years.

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If I had had longer than 3 minutes I would also have raised the widespread disruption caused during construction by heavy traffic, mud and dust on roads that are very narrow and already badly potholed. The inevitable loss of important road verges which support the last remaining vestiges of plant communities characteristic of ancient meadows and woodlands has barely been mentioned.

Approval would fundamentally change the rural character of the landscape to one that is semi-industrialised and enclosed, with a negative impact on the amenity of residents and visitors.