From: philip davey
To: Lime Down Solar
Subject: Open Floor Hearing, 21st April 2026 - Interested Party Reference [redacted] - PHILIP DAVEY
Date: 23 April 2026 17:37:35

INTERESTED PARTY REFERENCE NO: [redacted]

SPEAKER 39

PRESENTATION TO THE EXAMINING AUTHORITY ON 21 APRIL 2026 – EXPANDED TO INCLUDE FURTHER AND BETTER PARTICULARS OF INFORMATION TO WHICH REFERENCE WAS MADE

Good afternoon. My name is Philip Davey and I live in the village of Leigh Delamere. This sits approximately 3 miles to the south of the Lime Down Development. But it is also less than half a mile from the new 220 acre solar farm at Leigh Delamere [*PL/2021/06100*], and just two miles from the new 210 acre solar farm on the edge of Kington St Michael [*PL/2023/08481*].

The planning issue I wish to address is cumulative impact. In particular the impact of the development on the landscape and visual appearance of the area within the relevant Zone of Influence [*Table 21-3, Environmental Statement Volume 1, Chapter 21,*] taken in combination with other solar and battery storage development in the area. I refer to the 10km Solar PV Sites Area to which reference is made.

The Lime Down application comes at a time when this area of north Wiltshire is subject to a proliferation and concentration of new solar and related development.

This is reflected in the developer's own evidence on cumulative impact that appears in its Environmental Statement. There is a short list of developments set out in the final Table to Chapter 21 [*ES Volume 2, Table 21-8: Summary of Cumulative Effects*], being developments for which planning permission has been granted, but which are still at various stages of construction.

These are developments deemed capable of having a cumulative impact. It lists 38 developments of various types, and of these 25, or 64%, relate exclusively to new solar or battery storage facilities and related infrastructure.

I should stress at this point that this short list does not include reference to any existing solar or battery storage development in the area. That is to say developments completed and already in operation. Nor do the maps to which reference is made in this Volume [*ES Volume 2, Figure 21-2,EN010168/APP/6.2*] include the location of existing solar and battery storage facilities within the Zone of Influence. This is unfortunate.

The Schedule below includes a Table listing those existing solar and battery storage installations within the Zone of Influence for which information is publicly available. The

precise location of these has been mapped and can be viewed via the open source UK Renewables map at https://www.google.com/maps/d/u/0/viewer?mid=17FaYeZBcIizFSJst9CMBfpzFYUGXNpMG&femb=1&ll=55.028277432367545%2C-2.7050461544922833&z=6

NB. This map does <u>not</u> include the solar and battery storage developments listed in the developer's Environmental Statement.

The overarching legislation that covers the content of Environmental Impact Statements makes clear that regard should be had to both existing and approved development in the area [*S The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the "2017 Regulations") Schedule 3, paragraph 1(b).*]

The short list and the maps are therefore misleading as they don't present a true and accurate picture of the concentration of all solar and related development in the area.

The developer's conclusions on cumulative impact [*ES Volume 2,Table 21-8: Summary of Cumulative Effects*], so far as it relates to landscape, is that the clustering of these developments within the Zone of Influence is not an issue. Why? To paraphrase. Because you can't see one development from another – what is known as the 'inter-visibility' test.

But nowhere in the 2017 Regulations, nor in the guidance notes (*see the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment – published 20 September 2024, updated 2025*) does it state that inter-visibility is the sole and exclusive determinant of cumulative impact.

The proliferation and concentration of so much solar development within what is a relatively confined geographical area should be a matter of profound concern. The size and scale of the Lime Down development is surely a tipping point. The impact on the landscape and visual appearance of this area of north Wiltshire will be catastrophic.

I would therefore conclude by urging the inspectorate to closely scrutinise the conclusions presented by the developer on the cumulative impact of this development. On any reasonable examination they appear technically flawed, materially misleading and are of questionable objective value.

Thank you for your time today.

SCHEDULE

EXISTING SOLAR AND BESS DEVELOPMENTS WITHIN THE ZONE OF INFLUENCE

LOCATION	APPROXIMATE DISTANCE FROM THE LIME DOWN DEVELOPMENT SITE

Hullavington Solar Park, Hill Hayes Lane, Hullavington - Solar	**0.25 km**
Rodbourne Rail Solar Farm, Corston - Solar	**0.5 km**
Battens Farm, Allington - Solar	**4.5 km**
Castle Combe Circuit, Castle Combe - Solar	**5.00 km**
Lake Farm, Draycot Cerne - Solar	**5.5 km**
Lodge Farm Poulshot - Solar	**6.00 km**
Minety - BESS	**8.5 km**
Ravenscroft Farm - BESS	**8.75 km**
Malmesbury Solar – Long Newnton - Solar	**8.5 km**
Marsh Farm, Long Newnton - Solar	**8.5 km**
Newnton Dairy Farm – Long Newnton - Solar	**8.5 km**
MOD Lyneham, Lyneham - Solar	**9.00 km**
Hinton Sloar Farm, Hinton - Solar	**9.5 km**