

To The Examining Authority National Infrastructure Planning The Planning Inspectorate

Project Reference: Lime Down Solar Park (EN010168)

Subject: Submission of Written Representation by Hullavington Parish Council in response to Applicant's document EXAM/9.1

Dear Members of the Examining Authority,

Please accept this correspondence and the attached document as the formal Written Representation of Hullavington Parish Council regarding the proposed Lime Down Solar Park (EN010168). This submission serves as a response to Section 5.13 of the Applicant's Response to Relevant Representations (Part 1).

The Parish Council maintains its position that the Applicant's response is insufficient. It relies primarily on high-level, scheme-wide conclusions and fails to engage with the specific, evidence-based concerns we have raised regarding the impact of the development on Hullavington as a distinct settlement.

In the attached representation, we detail why we believe the Applicant has not:

- Adequately characterised the local landscape baseline;
- Addressed the settlement-level experience of our residents; or
- Demonstrated that the proposed mitigation is appropriate for the parish's specific rural context.

As the elected representatives and stewards of this Parish, we have a solemn duty to protect our community's character, its local ecology, and the interests of current and future generations. We respectfully request that the Examining Authority considers these unresolved matters as crucial to determining the weight that can be placed on the Applicant's current conclusions.

We appreciate the Examining Authority's time and consideration of our concerns, and we look forward to participating further in the examination process.

Yours faithfully,

██████████, Chair, Hullavington Parish Council

Written Representation of Hullavington Parish Council

Response to the Applicant's Response (Ref: EN010168, RR1905, Section 5.13, EXAM/9.1)

Executive Summary

This Written Representation identifies material respects in which the Applicant's response in Section 5.13 of EXAM/9.1 does not engage with the parish-specific concerns raised by Hullavington Parish Council. In particular, the Applicant relies on scheme-wide conclusions and cross-references to its own Environmental Statement rather than addressing evidence concerning the settlement-level experience of Hullavington and the character of its surrounding landscape. The Parish Council considers that this failure to engage with the adequacy of the local landscape baseline undermines the reliability of the assessment of effects and the effectiveness of the proposed mitigation. As a result, key matters remain unresolved and are relevant to the weight that can properly be attached to the Applicant's conclusions.

1. Introduction

1.1 Hullavington Parish Council submits this Written Representation in response to the Applicant's document **EXAM/9.1 – Applicant's Response to Relevant Representations (Part 1)**, specifically **Section 5.13 (Hullavington Parish Council)**.

1.2 This submission explains where the Parish Council considers that the Applicant's response does not adequately address the parish-specific concerns raised and where matters therefore remain unresolved for examination.

1.3 The sections below address, in turn, the principal themes raised in the Parish Council's Relevant Representation, including the treatment of Hullavington as a settlement, landscape character and baseline assessment, the siting of battery energy storage infrastructure, construction impacts, traffic and rural roads, and cumulative effects.

2. General comment on the Applicant's response

(Applicant response, Section 5.13)

2.1 The Applicant's response relies largely on cross-references to scheme-wide Environmental Statement chapters and outline management plans.

2.2 While these references describe the general approach taken to the Scheme, they do not explain how the conclusions reached apply to Hullavington as a parish and settlement, nor why the impacts experienced locally should be regarded as acceptable.

2.3 The Parish Council considers that the response demonstrates a continuing reliance on generic conclusions rather than engagement with specific, well-evidenced local concerns.

3. Effects on Hullavington as a settlement

(Applicant response, Section 5.13 – landscape and local impacts)

3.1 A principal concern raised by the Parish Council relates to the effect of the Scheme on Hullavington as a village, including its setting and its relationship with the surrounding countryside.

3.2 The Applicant's response refers to assessments undertaken at wider study-area levels but does not assess Hullavington as a settlement receptor in its own right.

3.3 In particular, the response does not explain:

- how the village would experience the scale and proximity of nearby solar development;
- how the associated land-use change affects the village's rural setting; or
- whether these changes alter the character and identity of the settlement.

3.4 As a result, the Parish Council considers that settlement-level effects remain insufficiently addressed.

4. Landscape and visual impacts affecting the parish

(Applicant response, Section 5.13 – LVIA and mitigation)

4.1 The Parish Council questioned whether the scale and extent of the Scheme would result in unacceptable landscape and visual impacts as experienced from within and around Hullavington.

4.2 The Applicant's response relies on conclusions from the Landscape and Visual Impact Assessment, including assertions that adverse effects reduce over time as mitigation matures.

4.3 This does not address the Parish Council's concern regarding:

- the severity and duration of landscape and visual impacts during the early and mid-operation phases, which are material in planning terms; and
- whether the mitigated landscape outcome would be compatible with the existing character of the parish.

Taken together, this approach fails to demonstrate that the Scheme responds appropriately to the underlying landscape strategy and character objectives applicable to this area.

4A. Landscape baseline and reliability of mitigation

(Applicant response, Section 5.13 – reliance on ES conclusions)

4A.1 The Parish Council remains concerned that the Applicant has not engaged with the substance of its objection regarding the characterisation of the local landscape baseline.

4A.2 The Applicant's response consistently relies on the conclusions of its own Environmental Statement, without addressing the Parish Council's evidence that the local landscape and settlement pattern around Hullavington are interconnected, sensitive, and experienced at a finer, settlement-level scale than reflected in the assessment.

4A.3 Where the adequacy of the landscape baseline has not been demonstrated, the Parish Council considers that the effectiveness of the proposed mitigation cannot be properly assessed, as it is predicated on that baseline characterisation. **This includes mitigation relied upon to address ecological effects, habitat function, and landscape-scale connectivity for wildlife.**

4A.4 The Applicant's response does not resolve this issue, and the reliability of the mitigation conclusions therefore remains a matter for examination.

4A.5 In addition, the Parish Council notes that the Applicant's response does not engage with the concern raised regarding the proposed location and presence of battery energy storage infrastructure. The response relies on generic conclusions relating to scheme design and mitigation, without addressing whether the siting of this infrastructure is appropriate in relation to Hullavington's settlement context and local landscape character. In the absence of a settlement-level landscape baseline, the Parish Council considers that the effects of this element of the Scheme have not been properly assessed.

5. Construction phase impacts

(Applicant response, Section 5.13 – construction management)

5.1 Concerns were raised regarding the construction phase of the Scheme, including disruption, duration, and effects on a rural community.

5.2 The Applicant's response refers to outline construction management measures but does not clearly describe:

- how construction activity would be experienced locally in Hullavington;
- how uncertainty arising from design flexibility would be managed at parish level; or
- how prolonged construction activity would affect residents over time.

5.3 Reliance on future approval of outline plans does not amount to an assessment of the worst-case construction scenario for the parish.

6. Traffic and rural roads

(Applicant response, Section 5.13 – transport matters)

6.1 The Parish Council continues to have concerns regarding the suitability of rural roads serving Hullavington for construction and operational traffic associated with the Scheme.

6.2 The Applicant's response refers to traffic management processes but does not demonstrate that:

- the physical constraints of parish roads have been adequately accounted for; or
- impacts on safety, amenity, and road condition would be avoided rather than managed reactively.

6.3 The Parish Council remains unconvinced that the acceptability of traffic impacts on local roads has been demonstrated. Additionally, the Fosse Way, an iconic Roman road runs through the middle of the proposed site. With protected sections, the steps taken to recognise the significance of this archaeological feature seem pitifully weak.

7. Cumulative effects

(Applicant response, Section 5.13 – cumulative assessment)

7.1 The scale of change experienced within the parish, considered cumulatively with other development in the wider area, was a central concern.

7.2 The Applicant's response concludes that cumulative effects are limited but does not explain cumulative experience from within the parish or along routes linking Hullavington to its surroundings.

7.3 Cumulative effects have been considered at a strategic level, but not at the parish or settlement scale, which the Parish Council considers critical to understanding real-world impacts.

8. Matters remaining unresolved

8.1 Having reviewed the Applicant's response, Hullavington Parish Council considers that a number of material matters remain unresolved.

8.2 In particular, the Applicant has not demonstrated that the effects of the Scheme on Hullavington as a settlement have been properly assessed. The response continues to rely on scheme-wide conclusions without engaging with concerns regarding settlement-level experience and landscape character.

8.3 The Parish Council remains concerned that the local landscape baseline has not been adequately characterised. In the absence of engagement with this issue, the reliability of the assessment of effects and of the proposed mitigation has not been demonstrated.

8.4 The Applicant's response does not resolve concerns relating to:

- landscape and visual impacts during the early and mid-operation phases;
- construction impacts as experienced locally;
- the suitability of rural roads serving the parish; and
- cumulative effects affecting Hullavington and its surroundings.

8.5 Taken together, these unresolved matters are relevant to the weight that can properly be attached to the Applicant's conclusions regarding the acceptability of the Scheme's impacts on the parish.

9. Conclusion

9.1 The Parish Council considers that the Applicant's response does not adequately address the parish-specific concerns raised.

9.2 In particular, the Applicant has not engaged with identified shortcomings in the landscape baseline assessment, and this omission has implications for the reliability of the conclusions presented on effects and mitigation.

9.3 The Parish Council invites the Examining Authority to take these matters into account when considering the adequacy of the Applicant's response and the weight that can be attached to its conclusions.

9.4 In summary, the Applicant's assessment lacks any meaningful engagement with the heartbeat of Hullavington. By relying on generic, scheme-wide conclusions, they have failed to acknowledge the actual people and habitats that make up our parish and our lived reality. The Parish Council exists to protect this community, and we cannot remain silent as our local

landscape is treated as 'disposable' for the sake of misplaced energy infrastructure. We have a duty to ensure that this generation does not bequeath a compromised, damaged parish to those who will live here long after this project is finished.
