

Written Representation on behalf of Mr John Eavis (Ref [REDACTED]) and Mrs Rosemarie Eavis ([REDACTED]) (the Owners) of Manor Farm, [REDACTED] (Manor Farm) against the proposed application for a Development Consent Order (the DCO) for the Lime Down Solar Project (the Development) by Lime Down Solar Park Limited (the Promoter).

1. Introduction

This Written Representation is submitted on behalf of the Owners of Manor Farm which lies between the proposed Rodbourne and Hullavington solar sites either side of the A429. The Farm extends to approximately 415 acres in total and is farmed by the Owners and their family. The main enterprises at Manor Farm are arable and sheep. Please see the attached plan.

The land affected is identified within the DCO Book of Reference and Land Plans as parcels: 05-043, 06-001, 06-002, 06-003, 06-004, 06-005 and 06-006.

These parcels together comprise a substantial and functionally important part of an active agricultural business. Approximately 70 acres are included within the draft DCO that will be subjected to extensive powers for the compulsory acquisition of rights for the Development.

This representation focuses on the principal issues for the Examining Authority and underpins the Owners objection to the Development. These issues are:

- Inadequate consultation and engagement by the Promoter;
- Disproportionate and excessive compulsory acquisition powers sought;
- Lack of design maturity and scheme definition;
- Failure to genuinely pursue voluntary agreement;
- Significant impacts on a viable farming business

2. Inadequate Consultation and Engagement

The Promoter has failed to undertake meaningful and proportionate consultation with the Owners, despite the extent of land affected.

In particular:

The Owners have not been provided with an anticipated layout for cable routes, highways works, access roads or working areas within the identified parcels.

There has been no clear explanation of construction access routes and working compounds including whether these parcels will be used for primary construction logistics and for what period of time.

Engagement has not resulted in any meaningful reduction or refinement of land take since the Promoter presented the initial proposals to the Owners, despite these concerns being raised from the outset.

Given that parcels 05-43 and 06-001 to 06-006 form a continuous corridor between two principal scheme components, a significantly higher standard of engagement would reasonably be expected.

The absence of such engagement indicates that the application has been brought forward with insufficient design maturity, relying instead on wide parameters and extensive powers.

3. Disproportionate Compulsory Acquisition

The extent of land included within the draft DCO limits across the identified parcels is excessive and not justified.

The Applicant seeks powers over approximately 70 acres, including rights not only for a cable route but also for:

- Construction compounds;
- Welfare facilities;
- Offices;
- Temporary and permanent access;
- Bell mouth access into site from A429.

3.1 Excessive “Option Area” Approach

The inclusion of an “option area” approximately 70 acres, without a more defined layout of the final scheme footprint, is indicative of a precautionary or convenience-based approach, rather than one based on demonstrable need. The main components of the Development required in this area should be available to the Promoter at this stage of the project.

The Promoters approach:

- Prevents proper scrutiny of impacts;
- Unfairly transfers design risk from the promotor to the landowner;
- Conflicts with the requirement to demonstrate that land is no more than is reasonably required.

3.2 Failure to Demonstrate Necessity and Proportionality

The Promoter has not demonstrated:

- Why each of the identified parcels is required to the extent proposed;
- Why alternative, less intrusive solutions have not been adopted;
- Why temporary use areas (e.g. compounds) cannot be reduced or relocated;
- The scale of land included suggests that the draft DCO limits are compensating for a lack of design certainty, rather than reflecting a justified land requirement.

3.3 Imbalance Between Rights Sought and Compensation Approach

The proposed approach—where compensation is linked to the eventual easement width, while significantly wider areas are controlled and disrupted—creates a clear imbalance.

The landowner is exposed to:

- Extensive temporary possession;
- Operational disruption across multiple parcels;
- Long-term effects from the Compulsory Acquisition rights contained in the DCO (even if not utilised) across the entire Title of the property, which will create extensive rights (or hold the threat of them) many years into the future.

This further underlines the disproportionate nature of the Development.

4. Failure to Genuinely Pursue Voluntary Agreement

The Promoter asserts that attempts have been made to secure voluntary agreements. However, the nature and substance of those discussions raise serious concerns.

The engagement to date:

- Has not adequately reflected the scale of impact across parcels 05-43 and 06-001 to 06-006;
- Has been based on incomplete information, particularly in relation to cable routing and construction use;
- Has not meaningfully addressed the operational needs of the farming business.

Offers and discussions have therefore been conducted in a context where:

- The landowner cannot fully understand the extent of the impact;
- The Applicant has retained maximum flexibility through wide Order limits;
- The burden of uncertainty lies entirely with the landowner.

In these circumstances, it is reasonable to question whether these efforts constitute a genuine attempt to secure voluntary agreement, or whether they are primarily intended to demonstrate procedural compliance in support of compulsory acquisition powers.

- A genuine negotiation would be expected to include:
- A more clearly defined scheme;
- A demonstrably minimised land take;
- Proper recognition of business and commercial impacts;
- Iterative refinement in response to landowner feedback.

These elements have been notably absent thus far.

5. Lack of Scheme Definition

A fundamental issue remains the lack of clarity as to how the scheme will be delivered across the affected parcels. Projects of this nature and construction elements of this type should be more mature by this stage of the Development.

5.1 Cable Route Uncertainty

The absence of a defined cable alignment within the relevant parcels prevents:

- Proper assessment of permanent land take;
- Identification of the most sensitive areas of the holding;
- Effective mitigation of impacts.

5.2 Construction Access

There is no clear commitment to or limitation on:

- Movement of heavy plant and equipment;
- Use of temporary access roads across the land;
- Duration and phasing of construction activities.

There is a credible concern that the affected parcels will function as a primary construction corridor and construction compounds, significantly increasing disruption beyond what is currently disclosed.

5.3 Local Highway Constraints

The surrounding road network is not evidently suitable for the scale of construction activity implied. There are ditches, drains and culverts along the A429 that will be impeded by the Development and the DCO does not demonstrate that impacts on these can be safely or effectively managed.

6. Impact on Agricultural Operations

The affected parcels form an integral part of a working agricultural unit.

The proposed powers would:

- Disrupt farming operations across multiple seasons;
- Disrupt the outcomes achieved under government backed environmental schemes (SFI and Countryside Stewardship);
- Restrict access and internal field connectivity;
- Introduce uncertainty affecting cropping and land management decisions.

The use of land for compounds and temporary works is particularly harmful, as it extends both the geographic scope and duration of impact.

These effects have not been properly quantified or addressed within the DCO.

7. Heritage Considerations

The local landscape and the village of Corston has historic context which may be adversely affected by extensive works proposed.

Given the absence of detailed design information, it is not currently possible to conclude that:

- Heritage impacts have been properly assessed;
- Adequate mitigation measures can be secured.

8. Conclusion

The inclusion of parcels 05-43 and 06-001 to 06-006 within the draft DCO exemplifies a broader issue with the application: an overly extensive and insufficiently defined scheme, supported by wide-ranging compulsory acquisition powers.

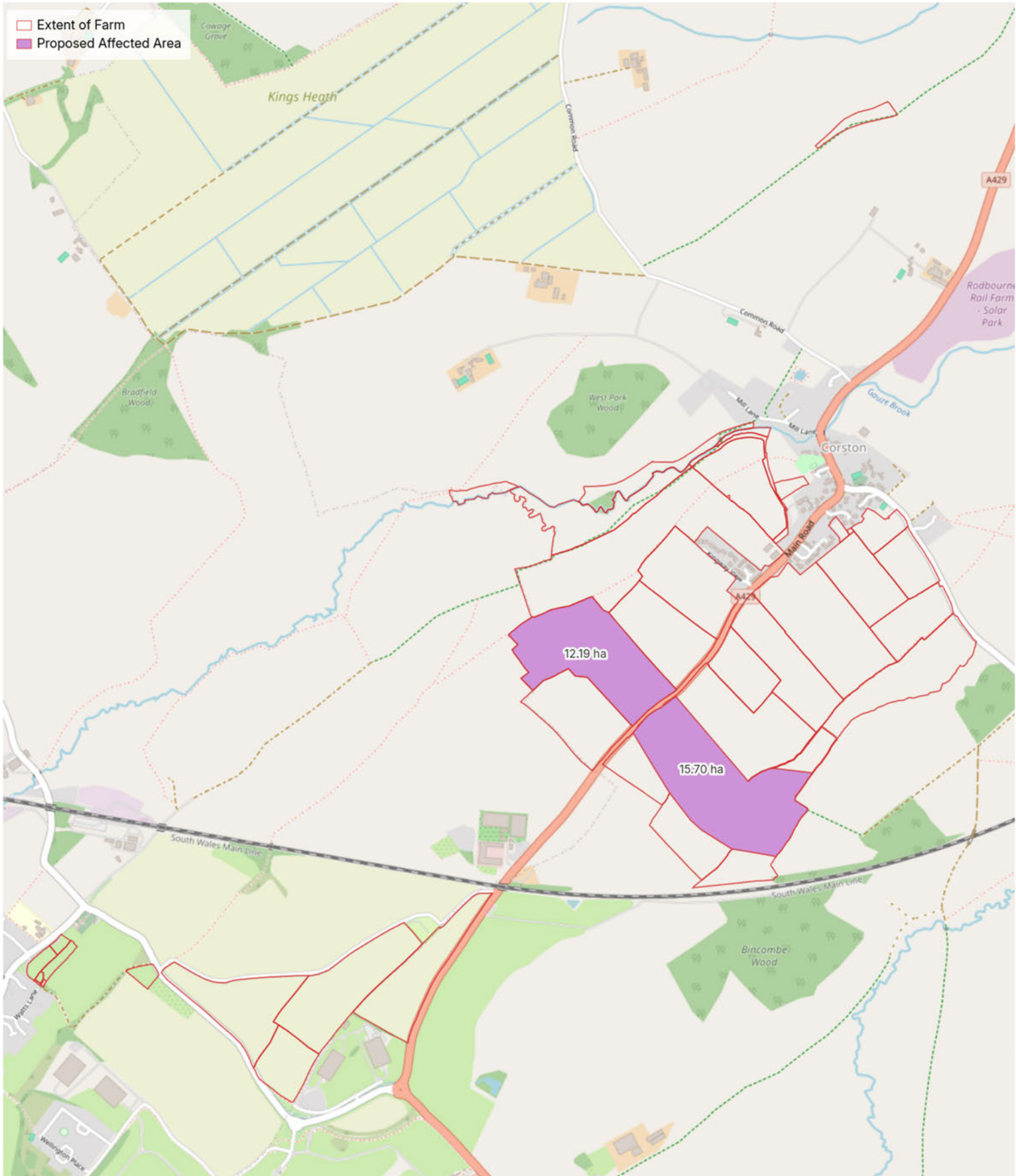
In summary:

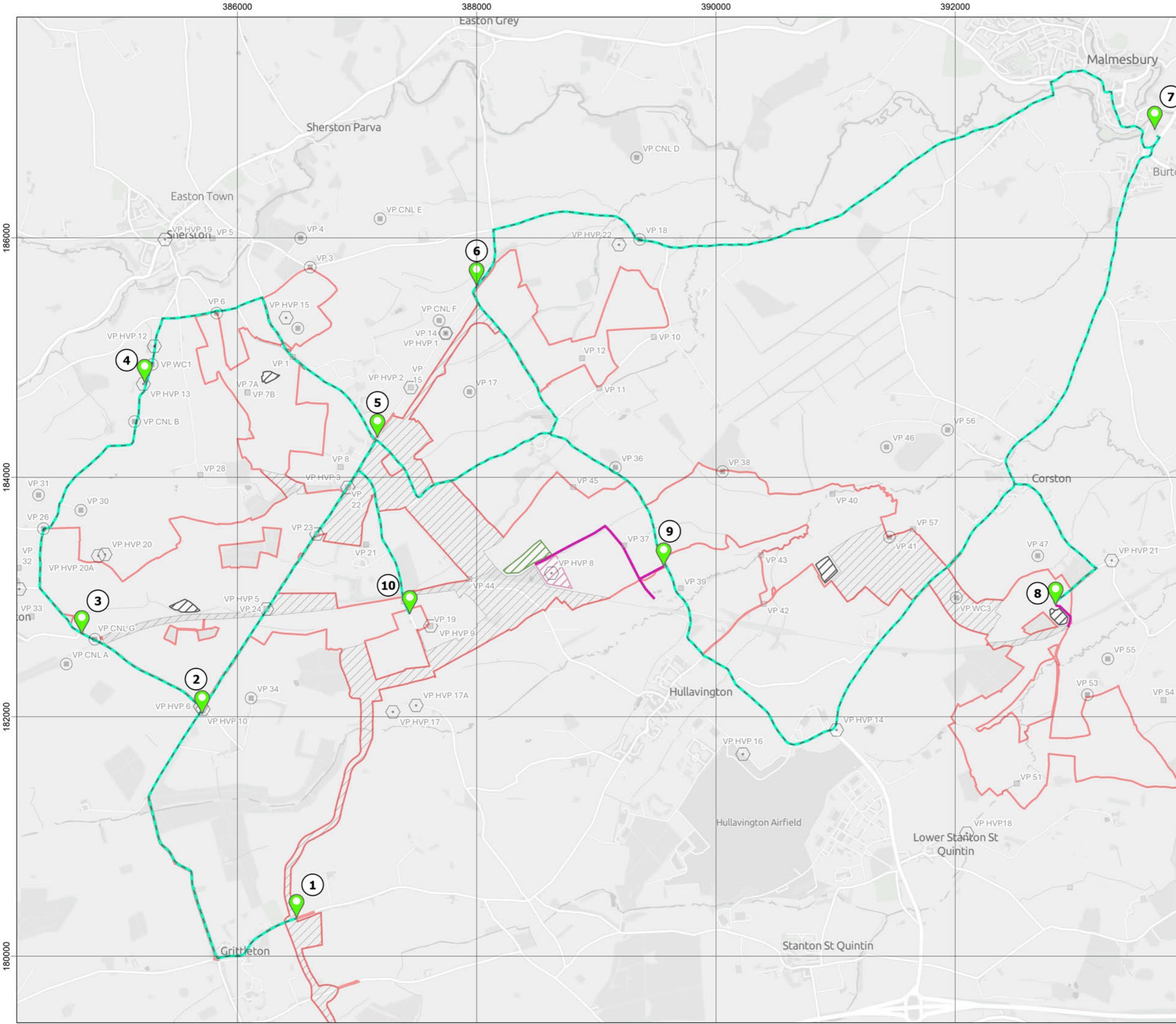
- Consultation has been inadequate and ineffective;
- The extent of land included is disproportionate and not justified;
- The scheme lacks sufficient design maturity;
- Attempts at voluntary agreement do not reflect a genuine or informed negotiation process.

The Promoter has therefore failed to demonstrate a compelling case in the public interest for the powers sought over Manor Farm.

It is respectfully submitted that development consent should not be granted in respect of these parcels unless and until:

- The scheme is materially refined;
- Land requirements are demonstrably reduced to the reasonable minimum necessary;
- A genuine and informed process of engagement with the landowner has been undertaken.





Title:
Route Map

Document:
9.4 Draft Itinerary for an Accompanied Site Inspection

- Legend:**
- Order Limits
 - Cable Route Corridor
 - 400kV Substation
 - 132kV Substation
 - BESS Area
 - Viewpoint with Photomontage
 - Viewpoint
 - Heritage Viewpoint
- Accompanied Site Inspection**
- Location
 - Driving route
 - Walking route

Data: IGP, Lanpro 2026
Base map: © Crown copyright and database rights 2026 Ordnance Survey 0100031673 Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack



Drawing no.: P4443_LPR_ZZ_XX_DR_Z_LVIA_0057

Coordinate system: British National Grid

Scale: 1:30,000 @ A3