

January Farrington Written Representation

Interested Party Reference: [REDACTED]

Summary:

This Written Representation focuses on IGP's response to my RR and areas where the evidence base in my view falls short, and where I respectfully ask the Examining Authority to look hard at what the Applicant has, and has not, demonstrated. The NSIP regime is, in my view, being used in a way that the Planning Act 2008 did not envisage. My concerns include:

- **Assessment of impacts:** The Applicant repeatedly concludes “no significant effects” across multiple topics including flooding, landscape, construction, decommissioning, socio economic impact, equine welfare and mental health. I do not consider these conclusions to be supported by robust, site-specific evidence.
- **Equine impacts:** The impact on [REDACTED] and the wider equestrian and rural economy. Horses have been treated as recreational receptors. No equine-specific assessment has been undertaken, despite the site being located within a highly active equestrian and breeding landscape. The effects of construction activity, moving tracker panels, operational noise and associated infrastructure on equine welfare and safety have not been properly assessed.
- **Business and economic effects:** The impacts on established rural businesses, including equine operations and the wider local economy they support, have not been adequately considered.
- **Site selection and alternatives:** The Applicant has not demonstrated that this is the most appropriate location when assessed against reasonable alternatives. The site selection process, the use of the NSIP regime, and the question of alternatives.
- **Governance and transparency:** There are outstanding concerns regarding the accuracy of public claims and the transparency of aspects of the scheme, which I respectfully ask the Examining Authority to examine carefully.

I want to be clear about something at the outset. The toll of this process has been very real. My family and I live and work at [REDACTED] in Corston, a thoroughbred stud which sits immediately alongside the proposed panel areas of Lime Down D and opposite the substation. [REDACTED]. They have shared my time and attention with Stop Lime Down since before they began either of these. Missed matches, rushed conversations, hours in front of a screen instead of with them. I mention it not to elicit sympathy but because the term “NIMBY”, used freely in the press and elsewhere about people in my position, fails to recognise what is being asked of communities like ours. We are being asked to absorb, without compensation and with almost no meaningful dialogue, a development that is fundamentally incompatible with the place we live in. For me this is not about a back yard. It is a question of what is right.

Ultimately, this is not simply a question of whether Lime Down can be engineered or mitigated. It is whether it is the right development, in the right place, at the right scale. I do not believe that it is.

Response to RR - I am writing to follow up on my Relevant Representation in the strongest terms I can.

Fundamental framing failure

IGP have not only failed to answer the questions I raised in my RR but they have systematically answered the wrong questions. They have absorbed my specific concerns into one generic response. This is a fundamental framing failure, not merely a formatting one.

I emailed PINS on 15th April 2026 to clarify the criteria by which IGP can simply decide to reply individually to some RR's and not to others. I do not feel this has been adequately addressed prior to the Written Representation deadline and I do not consider it unreasonable to expect consistency. Residents directly adjacent to the red line haven't warranted a response (in keeping with IGP's lack of engagement) the absence of any criteria for them to do so, is quite simply wrong. I mentioned at the OFH that our livelihoods are being treated as collateral damage. I feel dismissed, silenced and made to question if my participation carries any real weight. This is highlighted by my specific detailed RR remaining unanswered.

IGP continue to assess our thoroughbred stud, [REDACTED] as a recreational receptor. No land use compatibility, equine welfare or breeding assessment has been conducted. IGP's response to SE-27 and SE-28 treats equestrian operations exclusively as recreational receptors assessed under Chapter 16 (Socio economics, tourism and recreation). It continues to not engage with mine and others specific points that a thoroughbred breeding operation is a welfare and commercial business requiring a completely different assessment framework. This is a significant gap.

The word "breeding" does not appear in any equine response, despite the number of stud farms adjoining the red line. Nothing in any of IGP's equine responses addresses broodmares, covering season, foaling, young stock or the vulnerability of breeding stock during pregnancy and early development.

IGP's own response to SE-27 acknowledges that Park Farm, Yatton Keynell cannot be mitigated during construction and will be considered in the planning balance (but then asserts no significant operational effects). The only reason this equine farm has been acknowledged is because it sits within the cable route therefore, they have had to acknowledge Park Farm. No other equine property is acknowledged at all. This concession for Park Farm during construction, combined with the complete absence of operational phase analysis, is a significant inconsistency.

I noticed whilst spending hours navigating the unnecessarily complicated format of EN010168 I am absent from SE-29 (impact of proposal on horses) and O-06 (glint and glare safety including horse riders) despite my RR directly raising both these issues.

Moving tracker panels

My RR specifically highlighted the 4.5m moving tracker panels as a distinct welfare risk yet IGP's equine responses make no reference to tracker panels at all. The Glint and Glare response (O-06) addresses fixed tilt panels at 2.5m high will be used where required, but does not explain how or where this applies, nor does it address the behavioural impact on horses of continuously shifting visual stimuli, which is a separate issue from optical glare.

Operational phase

During the operational phase, IGP states explicitly that "no significant residual effects are anticipated during the operational phase." This is asserted without any equine-specific evidence and directly contradicts my points about permanent noise, movement, visual disturbance and our proximity to the substation. The response offers no engagement with the specific infrastructure adjacent to my farm, nor with the science of equine habituation.

BESS risks to horses

IGP's BESS response (SS-14) addresses human receptor plume modelling but does not address equine specific vulnerability and my point on the distinct and serious welfare risk given horses respiratory physiology and herd flight response.

Insurance and business viability

My RR explicitly raised the commercial untenability of insurance for high value bloodstock, staff and the loss of client confidence in an industrialised environment. IGP's response to SE-27 notes that workers "would be eligible for accessing skills and employment support measures." This is entirely non-responsive to the specific argument made, it treats the issue as one of individual employment rather than business destruction. For example local farriers and experienced equine staff should not be expected to retrain simply to accommodate Macquarie's destruction.

Flooding

The Gauze brook response (H-22) is generic and states hydraulic modelling concludes there would be no increase in flood risk downstream. It does not acknowledge Storm Bert, which clearly highlighted the extent of the flood risk, it does not address the sudden inundation of fields adjacent to our farm and does not engage with my specific point that neighbouring land, outside the red line boundary, bears the displaced consequences. The Environment Agency scoping concerns (H-06) are acknowledged but dismissed with a reference to ongoing Statement of Common Ground discussions. We have had no contact from the Environment Agency.

Macquarie/stewardship

The response to D-24 cites Macquarie's £65bn UK infrastructure investment and references the Cottom and West Burton consented (not built) projects. It does not engage substantively with the Thames Water Parallel beyond "concerns are noted"

██████████ and the equine Impact

██████████ is a working thoroughbred stud farm. We operate it alongside Dermot's international bloodstock business, which has been active for over twenty years and is responsible for Group 1 winners in every major racing country in both the Northern and Southern hemispheres. We invest in approximately 50 to 100 horses each year. Our farm accommodates a constantly changing population of high-value horses: pregnant broodmares, foals, yearlings, racehorses, and bloodstock boarded on behalf of overseas clients with horses regularly in transit to Hong Kong, Australia, the United States, and sales across Europe.

To give an indication of what those values look like in practice, just last week Dermot attended the OBS sales in Florida with a client who spent \$3,530,000 on five two-year-old thoroughbreds; one alone made \$2,300,000. Any of these horses we would expect to board on our farm in the future.

A core part of our business is “pinhooking” foals. These young horses remain with us for less than a year and are prepared for yearling sales. The work involves daily handling, including walking them in-hand around paddocks, particularly alongside the Gauze Brook.

Thoroughbreds are highly sensitive animals. They are prey species, neurologically wired to respond to unfamiliar noise and movement. A foal that panics in-hand can injure itself, the handler, or both. A broodmare disturbed in late pregnancy, or in the weeks after foaling, does not simply experience inconvenience. Outcomes are affected. A failed covering, a stressed mare, an injured foal, a client who loses confidence in the farm’s environment: each of these carries a financial cost that cannot be recovered. None of this is theoretical.

Our barns and stables sit in an elevated position directly overlooking proposed Area D. Our grazing and yearling-prep paddocks run alongside the Gauze Brook, immediately adjacent to the proposed panels. The proposed substation, which earlier in the process was described as a second BESS, is elevated and directly opposite our buildings.

Since acquiring the farm in 2018 we have invested substantially in facilities and infrastructure. We stopped two years ago. It would be irresponsible to continue investing under this level of uncertainty and exposure. This is an immediate, present, ongoing economic harm, not a hypothetical future one.

Our contribution to the local economy is significant and easy to measure. We employ three full-time staff and use a range of subcontractors; only last week I noted thirteen on site at once. Our part-time and full-time staff totals eleven. Annual local spend includes approximately £15,000 on farriers, £40,000 on vets, £100,000 on international transporters, £10,000 on domestic transporters, and £40,000 on locally grown hay, straw and feed. Our farm accountant is five miles away. Tractors, trailers and quads are sourced locally. We have given more than a dozen school leavers their first job. The last international client to visit invested £5million into the UK racing industry on the back of that visit. This is the kind of activity that, once disrupted, does not simply relocate, it will disappear.

In October 2023 (before any notification of Lime Down had been received), we discovered a monitoring device chained to our boundary fence. We believe it had been placed there to monitor sound. No permission had been sought. We requested its immediate removal. I mention it because it speaks to the wider pattern of how this scheme has been pursued.

Despite over 400 Relevant Representations specifically raising equine concerns, no equine-specific assessment has been produced. This is a highly active equestrian landscape yet the treatment of horses, and the businesses that depend on them, is in our view fundamentally inadequate. Specifically:

- There is no equine-specific assessment methodology.
- Static solar-panel guidance is being applied to large-scale tracking panels.
- Movement, angle change and shifting reflections are not assessed as behavioural stimuli.
- Construction and operational noise has not been assessed in terms of equine response.
- Rural lanes and Public Rights of Way have been downgraded on the basis of low user numbers.
- Equine businesses, including stud farms, are not being treated as sensitive receptors.
- Welfare risk has effectively been transferred to riders, handlers and businesses.
- Impacts have been categorised as “operationally accommodatable” without supporting evidence.

The wider equestrian economy in this area is not incidental. It supports farriers, vets, feed merchants, transport operators, agricultural contractors and a skilled local workforce. If the conditions that make this landscape suitable for high-value equestrian activity are degraded, that economic activity does not simply move. It largely vanishes. The loss is measurable, local, and permanent.

Our business, like others, has been treated as collateral damage. That is a hard thing to write, but it is the honest reflection of two years of trying to engage with IGP.

Appendix 8-3-3 (private receptors summary sheet (EN010168-000621-6)) concludes [REDACTED] (view point 46), as medium sensitivity, a very low magnitude of change in operational year 1, year 15 and decommissioning and a minor significance of effect throughout. IGP have never visited [REDACTED] or meaningfully tried to understand our business. How could they possibly claim these results? Trust in IGP has been eroded, with, in my opinion, professionalism lacking throughout.

Opportunistic site selection, not careful, strategic planning

Lime Down does **not**, in my view, represent a strategically planned project. It is opportunism by Macquarie, enabled by a system that allows it. IGP has not demonstrated, as it is required to, that this is the most appropriate location when assessed against reasonable alternatives. There is a clear absence of a robust and transparent alternatives assessment, particularly in respect of lower-impact options. The proposed development would result in substantial harm to the setting of the Cotswolds National Landscape, where policy requires weight to be given to conserving landscape character and tranquillity under Section 85 of the Countryside and Rights of Way Act 2000.

In the absence of compelling evidence that this location is necessary and given that site selection appears to have been driven by commercial and grid-connection convenience rather than a plan-led, least-harm approach, the proposal does not, in my view, demonstrate that its adverse impacts are justified or proportionate.

This matters because this is not anonymous land. Malmesbury is a highly desirable area to live, recognised again this year by The Sunday Times as the “Best place to live in the South West”. I do not believe any other NSIP solar sits within such a rural and residential setting, surrounded by such a density of homes, businesses and amenities. That is not a planning detail. It is the fundamental basis on which the appropriateness of this scheme should be judged.

Many of the benefits the Applicant claims, including elements of biodiversity net gain, may well deliver real results elsewhere. They are credible improvements on a degraded brownfield site. They are not credible on this kind of working rural and residential landscape, where the baseline is already a high-value, high-quality environment. The framework was designed for one situation and is being applied to another.

I ask the Examining Authority to consider what this scheme tells us about how the NSIP regime is now being used. The Planning Act 2008 was not, as I understand it, intended to function as a route by which a private developer identifies valuable available land may secure consent for nationally significant infrastructure regardless of whether it is the right place for it. Strategic need and least harm placement should come before planning, not after.

Grid connection allocations for Gate 2 offers have not even begun, because the engineering design work has not yet been done. Yet schemes are being progressed at speed in advance of that strategic groundwork. That is the wrong way round.

National policy, as it stands, does not adequately protect those unfortunate enough to live alongside these sites. There is no compensation framework, no enforceable duty on developers to consider the residential effect on neighbouring families, no equivalent of the protections available on other forms of major infrastructure. The system effectively treats us as collateral damage, and it is being exploited on that basis.

The unprecedented length of cable route (22km) disrupting so many landowners adds a further dimension. Many of those landowners feel intimidated by the structure and tone of Heads of Terms. These claim to be voluntary yet threaten Compulsory Acquisition and include time-limited incentive payments. The Applicant later admitted that a controversial silencing clause “should not have been included”.

The scheme depends on only nine participating landowners. I understand that some have since had reservations about their involvement but may be constrained by confidentiality and non-disclosure clauses. In those circumstances, the existence of signed agreements should not be treated as straightforward evidence of free, continuing support for the scheme. The original landowners option to lease premises agreement was for 30 years with the option to extend to 40 years in 5 year increments.

Governance, Conflicts and the accuracy of public claims

I would respectfully ask the Examining Authority to consider some matters that go to the integrity of the process.

The Applicant's public statements. Lime Down's own website FAQ states, in answer to the question of whether the scheme is supported by government subsidies: “Lime Down Solar Park will not require any public money, subsidy or funding.” That is, in my view, misleading. If wholesale power prices fall, or UK government bond yields move materially, large-scale solar typically requires public subsidy support to remain viable. An unqualified statement of that kind, made in any other regulated context, would carry serious legal consequences. It is being made here in connection with a development of national significance, and it should be tested.

The structure of legal representation in solar NSIPs also deserves consideration. Pinsent Masons appears to act for every solar NSIP developer of significance in the UK, and to have written substantial guidance in this area, including, I understand, training material provided to the Planning Inspectorate ahead of Cleve Hill seven years ago. Even if every individual involved acts entirely properly, the perception of overlap between IGP's legal advisors and those who have shaped the process should not be dismissed.

The ownership and governance of the developer itself. Island Green Power's ultimate owner is Macquarie, an Australian investment bank whose approach to extracting returns from UK regulated assets has, in other contexts, drawn comparisons to Thames Water. IGP's Chairman is Bertie Ahern; its directors include Denis O'Brien both of whom are public figures whose track records have been the subject of significant public concern. We were able to stop IGP's attempted sponsorship of Tetbury Rugby Club through Gareth Philips (Pinsent Mason). In December 2025 an MP wrote directly to Macquarie, warning investors that future policy changes could remove subsidy support for industrial-scale solar; that political risk now sits on top of the financial one and is relevant to the reliability of what is being promised here.

Macquarie itself maintains a well-established ESG governance framework including its Environmental and Social Risk, Green Investment, Human Rights and Modern Slavery policies, committing the group to identifying high-risk supply chains and suppliers, and to balancing community concerns and environmental impact against the purpose of any given investment, with oversight from its Board Governance and Risk Committee. IGP's continuing inability to confirm where the solar panels and battery storage equipment for Lime Down will be sourced from raises a clear question as to whether the project, as currently proposed, can be delivered within Macquarie's own published standards. Biodiversity and cultural heritage are, I suspect, further areas where the same question arises.

There is a further matter of how public support for this scheme has been represented. The Planning Inspectorate has confirmed that Lesley Bennett, a former Mayor of Malmesbury, has submitted two Relevant Representations in support of Lime Down. (RR-2768 and RR-2769). Together, these two submissions account for approximately 3.6% of all representations supporting the scheme and feels very dishonest. The same individual has also been the principal supportive voice featured in BBC coverage of this application. She has filmed coverage at an unrelated 1MW community solar development, not in any way comparable to Lime Down. Ms Bennett, it appears worked for Wessex Water for approximately twenty years prior to her time as Mayor. When asked publicly about Macquarie's involvement in both Lime Down and Thames Water, she has stated that she has no view. Macquarie's reputation for extracting returns from UK regulated assets is now well documented, and the parallels between Thames Water and the financial structure of large-scale solar are not, in my view, peripheral to a fair understanding of this application.

I would respectfully ask the Examining Authority to consider:

- Whether two Relevant Representations submitted by the same individual under slightly different forms of her name should be counted as one voice or two when the weight of public response is being assessed.
- Whether broadcast media coverage that presents footage from an unrelated 1MW community installation alongside commentary in support of a 500MW NSIP scheme can fairly be described as informing the public on a like for like basis.
- Whether, in a planning process where opposition has been registered by nearly 5,000 representations and Wiltshire Council has unanimously objected, the asymmetry of media representation should be reflected in how the weight of public response is understood.

Most important, to anyone trying to understand what the Applicant's promises actually mean in practice is Cleve Hill solar park in Kent. I would urge the Examining Authority to look carefully at how that scheme operates today against what was said about it at consultation. The claims do not align with the reality. Cleve Hill is the only operating, real-world solar NSIP comparator we have, and it tells a different story to the one being told here.

<https://www.facebook.com/share/v/19Pr1ftnJL/?mibextid=wwXlfr>

I would also flag that we have submitted Freedom of Information requests, including in relation to the grid connection, where we have been unable to obtain answers. Transparency on these points is, in my view, essential to fair examination.

Cleve Hill Solar Park in Kent is the first operational solar development to be consented through the Nationally Significant Infrastructure Project (NSIP) regime and is therefore the

closest available comparator to Lime Down. However, it is significantly smaller in scale than the proposed Lime Down scheme, representing only a fraction of the land area and infrastructure proposed here. Consultation material claimed 90,000 homes could be powered but in reality, the electricity generated is exported to the national grid and contracted through corporate power purchase agreements, including with commercial entities such as Tesco and Shell, rather than being directly supplied to local households.

“No Significant Effects” – Questions for the Examining Authority

Across an extraordinary range of topics, the Applicant has reached the conclusion of “no significant effects”: flooding and hydrology, landscape and visual, construction noise, decommissioning, socio-economic impact, equine welfare. I respectfully ask the Examining Authority to consider what site-specific, real-world evidence supports those conclusions, as opposed to generalised assumptions about solar development.

The Applicant points to its mental health assessment in ES Chapter 18 and to a commitment to signpost residents to local services. More than two years into this process, I am not aware of a single member of the affected community having been contacted by IGP, by Wiltshire Council's Public Health Team, or by any local support team mobilised in response. The commitment is on paper. The "no significant effect" conclusion is not felt on the ground.

Specifically, I would ask:

- **Flooding and hydrology:** what site-specific modelling has been done at this scale and panel density, taking account of the recent flood history on the Gauze Brook and the railway cutting? What enforceable controls exist to ensure discharge to watercourses does not increase during heavy rainfall events?
- **Public water supply:** Wessex Water draws drinking water from the aquifer beneath the Scheme, yet has, to my knowledge, neither engaged with the examination nor submitted any reports. How can the Examining Authority be satisfied that the aquifer is adequately protected in the absence of the statutory undertaker responsible for it?
- **Landscape and visual:** on what evidence is it concluded that infrastructure including panels up to 4.5m high will not result in significant long-term harm to landscape character? How much weight is being placed on mitigation planting that takes at least 15 years to establish, when the harm is immediate?
- **Construction noise:** how is it credible to conclude no significant construction noise effect when hundreds of thousands of piles will be installed? What real-world comparator project supports that conclusion?
- **Decommissioning:** how can land hosting substations, BESS infrastructure and deep piling realistically be returned to its original agricultural condition, and what evidence supports the claim that it can?
- **Delivery and enforcement:** what mechanisms genuinely guarantee delivery, maintenance, and compliance over a 60-year operating period, across changes of ownership, which are common in this sector? What enforcement realistically occurs if mitigation fails?
- **BESS connection:** will the Lime Down BESS actually be connected to the solar? Solar NSIP developers have admitted that the BESS is often not actually connected to the solar, citing that the solar would not produce enough electricity to make it worthwhile. If the BESS is in practice for importing from the grid, this raises the

question of whether the solar NSIP route is being used to secure consent for what is, in effect, a grid-arbitrage battery installation.

- **BESS safety:** given that global BESS capacity has been rolled out faster than the regulatory framework has matured, and given the long latency of some thermal-runaway and health concerns, what site-specific safety case has been made for residents, livestock and equine businesses adjacent to the proposed installation?
- **Socio-economic impact:** what evidence underpins the Applicant's job and economic figures, and how have indirect and local-business impacts, such as ours, been counted, rather than dismissed? It is a gross underestimation to claim that just 20 agricultural jobs will be lost. There are 12 tenant farmers and their families alone, losing their livelihoods.
- **Process transparency:** on what authority were national press initially refused access to the Open Floor Hearing? On what authority were so many redactions made from the Relevant Representations, especially in relation to Macquarie and Thames Water? What is the position on Stop Lime Down's use of short clips from the Open Floor Hearing footage for our ongoing campaign?

Closing

This is not a question of whether something can be engineered, modelled or mitigated. It is a question of whether it should be built here, at this scale, in this place. Lime Down does not, in my honest view, pass that test.

There is broad public support for solar energy in the right places: rooftops, warehouses, brownfield. There is far less awareness of the scale, the inefficiencies, and the long-term implications of developments such as this. Public opinion on large-scale solar on farmland has shifted significantly in recent years, and that shift deserves to be acknowledged in decision-making.

I would ask, finally, that you reflect on independence, accountability and the long-term consequences of this decision. There must be accountability, not just today, but to the generations who will live with the result.

Thank you for considering this representation.