Lime Down Solar

Submitted by: Dermot Farrington

[redacted]

Interested Party reference number: [redacted]

Bottom Line Up Front

If this proposal is approved my Business will close with the effects on the local economy and livelihoods described below.

Lime Down cannot guarantee that their construction will not lead to my horses going through fences and ending up on a public road, with the consequences that follow for them and for any motorists involved. They cannot guarantee that my paddocks will not flood with their silt and top soil, or that the air my horses breathe during construction will not be loaded with respirable particulate. They cannot guarantee that BESS infrastructure will not present a fire and inhalation risk. And they cannot show me, on paper or otherwise, the equine-specific risk assessment that ought to underpin every one of their conclusions.

On the evidence as it stands, the Environmental Statement cannot be considered adequate. The current proposal is, in my view, fundamentally incompatible with the operation of a thoroughbred stud farm and the wider thoroughbred industry that depends on the conditions of this landscape.

1. Who I am, and why this matters

I started my own Equine Bloodstock Company thirty years ago and have built a significant international bloodstock advisory and trading business. On average it facilitates over £5m of investment in thoroughbred bloodstock each year, plus the ongoing keep and maintenance behind that. In 2026 alone we have already exceeded that figure.

I have been directly responsible for success at the highest level of the sport, including multiple Royal Ascot winners and many Group 1 and Classic winners, with elite horses in every major racing jurisdiction in the world: Ireland, England, France, Hong Kong, Dubai, the USA, Canada, Japan, Australia, New Zealand and Argentina.

[redacted] sits at the centre of all of this. It is not a hobby yard. It is a working stud and bloodstock operation, and a vital piece of an international business. If Lime Down is consented to in its current form, that business and my clients' continued investment in the Wiltshire and wider UK thoroughbred racing industry will not survive on this site as it stands today.

I am not putting that in for effect. We have already stopped further investment in our infrastructure and plans are on hold. We have begun handing notice to staff because I cannot guarantee long-term positions next to a development of this scale, and we have stopped actively recruiting trainees. Over the last six years we have helped over twenty young school and college leavers take their first step into the thoroughbred industry, several of whom have gone on to genuine careers. That stops the moment a solar farm of this size is built next to the hub of our business. The Applicant's suggestion that affected staff “can retrain” is not a serious answer. It is a one-liner with no substance behind it.

2. The wrong framework has been applied

Lime Down sits in the heart of equine country. That is a defining characteristic of this area, both culturally and economically - thoroughbred stud farms, 3 day eventing, racing, dressage, polo, hunting, point-to-pointing, and everyday leisure riding. Olympians and internationally significant operations are linked to this landscape. Almost 400 of the Relevant Representations specifically raise equine concerns. Mine is one drop in that much wider sea of objections.

Despite that, the Applicant has not assessed this scheme through an equine welfare lens at all. Horses, and the businesses that depend on them, have not been treated as sensitive receptors. Static solar-panel guidance has been applied to large-scale tracking panels. Noise has been assessed against human thresholds rather than equine response. The vulnerability of broodmares, foals and young stock has not been addressed. Rural lanes have been downgraded on the basis of low user counts. The wider equestrian economy farriers, vets, transporters, feed merchants, agricultural contractors has been left out.

This is not a question of an assessment that is on the right track but underestimates effects. The wrong framework has been applied. Horses, and especially thoroughbreds, cannot be treated as ordinary agricultural receptors or general “countryside users”. They are flight animals with highly developed sensory systems, evolved to detect and react to threats through sound, movement, light and environmental change. The peer-reviewed evidence on this is unambiguous and is referenced at the end of this representation. The Applicant's submitted material does not engage with it.

The only equine organisation referred to anywhere in the Applicant's documentation is the British Horse Society, whose Wiltshire Access Team is a voluntary group and which itself formally objects to the scheme, describing it as a “mega industrial estate” in a rural landscape. When I spoke with BHS directly, they said they had not heard of IGP or Pager Power, and presumed any guidance must have been pulled from their website. The Applicant's chosen single equine “mention”, in other words, opposes the project.

Even the BHS, by their own scope, do not cover the thoroughbred racing industry. a sport that on conservative figures, employs around 80,000 people and contributes over £4 billion to the UK economy each year. That is the industry Lime Down sits next to. Not one report in the application has been written by a thoroughbred industry expert, never mind by anyone with knowledge of [redacted] itself.

3. The flight response, and why it is a safety issue here

It is well documented and accepted that horses are flight animals, easily spooked by unexpected noises and movements. Examples of spooked horses bolting blindly into fences, into cars, even out to sea, are not difficult to find. They put themselves at risk and they put anyone in their way at risk.

That risk is amplified at [redacted] because our horses are predominantly young foals, yearlings, and untrained two-year-olds and very lightly handled. They are not the trained riding horses the public imagine. There are tens of thousands of UK hospital admissions every year arising from horse-related injuries; thoroughbreds present the highest risk in the sector, and equine fatalities are not uncommon. By law I have to provide a safe working environment for staff working with the most unpredictable population of horses there is. I

cannot honestly say I can do that next to years of construction noise, ground vibration and unpredictable heavy machinery activity.

Loose horses on public roads are not hypothetical. April 2024 on the A303, the M4 in 2003, the A350 in 2022 and the A429 in 2025 all involved loose horses on major roads. We sit close to both the M4 and the A429. The British Horse Society's "Horse-i" data records 19,528 road incidents involving horses in the UK since the app launched, with 559 horses killed, almost 1,000 people injured and eight people killed. Those figures do not even include the higher-risk thoroughbred population in our area. People will also remember the trained Household Cavalry horses that bolted in central London in 2024, spooked by building construction; trained police horses in Sydney did the same that year. Those animals had been worked with for over a decade. My foals and yearlings have had little more than basic human handling.

Where in the application is the equine-specific risk assessment that addresses any of this? I have not been able to find one.

I would also draw the Examining Authority's attention to a written notice from my farrier:

> *There is no way I will continue to trim and shoe your horses if a construction site like Lime Down is next to you. I cannot see how it could be safe for me to pick up the hind leg of a horse while someone within shouting distance bangs posts into the ground or drives heavy machinery while I try to safely work on your horses.*
>
> [redacted]

That is from the person actually doing the work, not a paid consultant.

4. Construction and operational impact – two distinct compounding layers

The impacts on this site fall into two compounding categories.

During construction the scheme introduces prolonged HGV traffic, piling up to approximately 4 metres, machinery noise, ground vibration and constant human activity into what is currently a calm and predictable environment. These impacts are time-limited but intense, and they will persist for years. There is no realistic way to insulate sensitive equestrian operations from them.

Once operational, the scheme introduces a permanent and chronic set of stimuli: tracker panels that move throughout the day, shifting reflections and shadows, inverter noise, substations and BESS infrastructure. None of these features switch off. They are part of the landscape for the lifetime of the scheme, and the evidence shows their effects on horses, particularly breeding stock, are likely to be cumulative rather than diminishing over time.

Beyond the obvious risk of horses escaping or injuring themselves, my staff or grooms, the wider research is clear that unfamiliar or unpredictable stimuli can trigger sustained stress responses repetitive walking inside paddocks, weight loss and broader health decline. Racehorses cannot be reared successfully in those conditions. Applying static-panel guidance to a tracking system is a fundamental methodological flaw, not a minor one.

The Battery Energy Storage System adds a further, distinct layer of risk. In the event of a thermal-runaway fire, veterinary evidence from comparable schemes confirms that horses, due to their respiratory physiology and behavioural response to fear, are particularly

vulnerable both to direct inhalation injury and to severe trauma caused by uncontrollable herd flight during emergency events.

5. Noise, and the sound monitor placed on my land

The Applicant's noise assessment is, in my view, not credible.

A sound monitor was placed on my land on 12 October 2023 without permission, in a position that could not produce relevant data for our site. I provided the wrong date in my first written submission, which the Applicant was quick to use to claim no fault on their part. The corrected date is now on the record, and a date-stamped photograph can be provided. Separately, the contractor that carried out those surveys has admitted the error to me directly.

If the location of the sound monitors cannot be reliably established, the survey data based on them cannot be relied on. And in any event, what the assessment lacks is not human noise mapping. It is any meaningful evaluation of how noise particularly intermittent, tonal or unpredictable noise during construction and from BESS or inverter operation will affect thoroughbred horses, who do not reliably habituate to such stimuli. The science is clear that noise anxiety is a genuine and significant welfare issue in horses. Lime Down's evidence base does not address it.

6. Flooding, soil disturbance and silt run-off

Left: Proposed site of the Solar Panels flooded adjoining to the South of [redacted] not flooded.

The Applicant has provided no real assurance that disturbance of the soil in the proposed development fields will not cause increased flooding on my side of the boundary. At consultation I saw little evidence that the project team understood that the fields they intend to develop sit on a flood plain, or that the area can carry approximately two foot of water spanning around 100 metres from the Gauze Brook in heavy rain. Video evidence is available. There are numerous examples of Malmesbury flooding with 2024 described as the worst event for 25 years.

Disturbing this land at the wrong time of year, without the cover that crops or vegetation provide, risks the deposit of silt, top soil and debris on my land that would otherwise be held in place. There is also a real risk of fence damage where excess water is pushed across boundaries that, in normal conditions, divide the land naturally.

This is not theoretical. There is now a meaningful body of international litigation specifically on this issue:

- In 2023, Silicon Ranch and its construction contractor reportedly had a $135m award made against them in the United States for silt and sediment erosion damaging neighbouring property.

- Massachusetts local government required the developers of solar projects in Ware and New Braintree to pay over $500,000 in fines after they failed to manage runoff from their sites.

- In 2024, a Georgia court granted an injunction stopping Pine Gate Solar in its tracks because no proper pollution prevention plan was in place.

I do not see in Lime Down's submitted material the site-specific, location-by-location plan that would meaningfully address these risks at [redacted] What I have received are box-ticking answers, generic plans, and reports that do not engage with the actual flood plain or boundary at our farm, or with the seasonal extremes twenty or thirty days of consecutive rain, or three months of drought that this landscape regularly produces. The Applicant has not, in my dealings with them, attended in real time to specific events on the ground.

7. The dust-bowl effect

It is well documented that disturbance of large areas of top soil over an extended construction period creates a “dust bowl” effect. I have not seen any submitted evidence on prevailing wind direction in this area, average wind speeds, or how dust generated by the construction site will be carried over my land and into the lungs of horses and people. Where is the dust management plan for humans, and where is the separate plan for the thoroughbred horses on the adjoining land? Again, this is not my view alone:

> *The proposed large-scale solar development adjacent to equine grazing presents a material risk of clinically significant respiratory compromise in horses bred and managed for elite Thoroughbred performance. Construction activity will generate respirable airborne particulate matter, including dust and crystalline silica arising from soil disturbance, excavation, and heavy vehicular movement. In high-value equine populations, even subclinical lower airway inflammation is clinically relevant, with well-established effects on performance and future racing potential.*
>
> [redacted]

Peer-reviewed evidence demonstrates that inhalation of respirable dust induces neutrophilic airway inflammation, mucus accumulation, and reduced pulmonary function, with severity closely associated with exposure levels (Couëtil et al., 2016; Ivester et al., 2014). Even short-term exposure in susceptible horses may result in persistent airway inflammation, airway sensitisation, and sustained impairment of respiratory function, with potential for long-term or irreversible effects on athletic capacity.

[redacted]

Given the horse's high minute ventilation, particularly during exercise, inhaled particulate dose is substantially amplified compared to humans. Sustained exposure to construction-related particulate matter particularly in downwind paddocks and training environments therefore represents a predictable and avoidable risk to respiratory health, performance, and breeding value.

[redacted]*, BA (Mod) Biochem DBS DVM Cert Equine Sports Med, Senior Equine Veterinary Surgeon and Advanced Practitioner in Equine Sports Medicine*

8. Biodiversity, the "lake effect", and dead birds on grazing land

The Applicant's claim that local habitat will actually be improved by this scheme does not, on the evidence, hold up. Research from Aix-Marseille University in France indicates that the presence of solar panels significantly affects biodiversity and soil respiration, with measurable negative effects on small soil organisms and plant survival. Murdoch University in Australia has shown that solar facilities affect fauna through habitat loss and fragmentation, altered microclimate, and the creation of a novel landscape that no longer functions as the previous one did.

In 2025 [redacted] of Murdoch University published work describing what she calls the "lake effect": migrating birds mistake solar farms for water, landing on them for rest and hydration, drawn down by polarised reflections and the abnormal insect populations those reflections attract. Wider analysis suggests roughly 17.1 million birds are killed worldwide each year as a direct consequence of solar installations, through collisions, burns, entrapment and starvation. Lime Down has not produced any meaningful study of how this will or will not happen here.

Where the dead birds end up is not a peripheral question for me. It is a biosecurity question:

The potential for avian mortality associated with large-scale solar installations also raises biosecurity considerations in equine environments. The presence of bird carcasses within grazing land may pose a risk to horses through contamination of pasture with pathogenic organisms, including Clostridium botulinum, which is recognised as a cause of botulism in horses following ingestion of contaminated forage or carrion material. Horses are highly susceptible to botulinum toxin, and even low-level exposure can result in severe and potentially fatal neuromuscular disease. From a veterinary perspective, the introduction of carcass material into grazing systems represents an additional, avoidable risk to equine health.

[redacted]

At consultation I asked, more than once, what the Applicant's plan is for tree and hedge species along the boundary between the proposed development and our farm. I was told the council would maintain them. I could not get one named species from any representative I spoke to. That is not a serious answer to a serious question on a 3,000-acre development.

9. The economic and human consequences on the ground

This is not just about the horses. It is about the people who depend on them.

Across this summer I had, on a single day, sixteen people on the farm at once permanent staff, part-timers and contractors. That is what a working stud at our scale supports day to day. We are also a customer of a long list of local businesses: farriers, vets, hay and straw suppliers, feed merchants, transporters, agricultural contractors, our farm accountant five miles away, local equipment suppliers. None of that is discretionary. It is the economy that exists because this landscape supports a working thoroughbred industry.

I have already had to begin handing notice to a member of staff. The mental health impact of losing a job he genuinely loved sits with him and with me. Where in the Applicant's submitted material is the assessment of that? Where, more broadly, is the assessment of the loss of livelihood for the people who service our farm and others like it? Because if this landscape becomes incompatible with thoroughbred breeding, that economic activity does not relocate. Much of it disappears.

Regards,

Dermot Farrington

[redacted] Corston

Summary of Evidence & Equine Reports submitted

A Review – Large Scale Infrastructure Projects and Their Impact on Stud Farms by

D.P. Leadon, Irish Equine Centre, Kildare, Ireland

Author affiliations - W.M.Bayly, Washington State University and D. R. Hodgson, University of Sydney (Summary Below)

Celia Marr – Expert comment to Kildare County Council. *European specialist in Equine Internal Medicine* (Summary Below)

The Impact on Noise Anxiety on behaviour and welfare of horses from UK and US Owner's Perspective August 2022 by Frank Van Eerdenburg. *Citation - Maria Giorgia Riva, Francesca Dai, Mirja Huhtinen, Michela Minero, Sara Barbieri and Emanuela Della Costa*

Equine Veterinary and BESS Safety Evidence - Lime Down April 2026 – CVS Equine/ *Troytown Equine Hospital, Hugh Dhillon MVB cert ESM MRCVS*

Vet report (Lime Down) – George Gemmell, DVM, MRCVs, Gibbs Marsh Equine (Dorset)

Morgan and Morecambe – Managing equestrian noise at Equestrian Receptors *Technical Note – 22 October 2025*

Veterinary Report (Lime Down) – Dr Annemarie Murphy BA (Mod) Biochem DBS DVM Vert Equine Sports Med – 28 April 2026

House & Hound Article – Accidental Electrocution was cause of Newbury Horse Deaths - 17 February 2011

D. P Leadon Review:

This evidence demonstrates that this is not an area of uncertainty, but one where existing scientific and observational knowledge has not been properly applied. Horses are biologically adapted to respond to environmental change, with noise, movement and visual disturbance triggering predictable behavioural and physiological reactions. These responses are particularly pronounced in breeding environments, where mares and foals are more vulnerable. The use of inappropriate comparator studies, such as racecourse noise exposure, further undermines the reliability of the assessment. Importantly, commonly proposed

mitigation measures have been shown to be ineffective or impractical, meaning that the fundamental issue is one of location rather than mitigation.

- The evidence base is not absent; rather, it has been overlooked or misapplied, with existing scientific and observational data clearly identifying risks to equine welfare.
- Horses are neurologically adapted to detect and respond to potential threats through multiple sensory pathways, making them inherently reactive to environmental change.
- Evidence shows that the majority of horses exhibit immediate flight responses to perceived threats, with a significant proportion sustaining injury during such events.
- Noise-related stress responses in horses can persist for extended periods, meaning impacts are not limited to the duration of the stimulus itself.
- Construction and operational noise levels associated with large-scale infrastructure exceed typical stud farm baseline conditions by several orders of magnitude.
- The use of racecourse or controlled-environment studies as comparators for breeding environments is scientifically inappropriate and has been explicitly disavowed by their own authors.
- Pregnant mares and foals are particularly vulnerable, with evidence linking environmental disturbance to disrupted gestation, impaired bonding and developmental instability
- Evidence indicates that commonly proposed mitigation measures, including stabling, sedation and relocation, are often ineffective or impractical in managing equine responses to environmental disturbance.
- Report identifies impact on insurance and investment for equine businesses suggesting insurance may be withdrawn or become invalid which will likely make investors relocate horses.
- The report confirms other countries apply a 1km buffer zone and equine specific planning rules which show this is a recognised issue globally and not spectulative.

Celia Marr Report:

Toxic gas exposure risk is severe and scientifically evidenced – specialist veterinary evidence confirms that lithium-ion battery fires can release highly toxic gases, including hydrogen fluoride, capable of forming airbourne plumes at concentrations that are dangerous and lethal to animals in the surrounding area.

- Horses are uniquely vulnerable to inhaled toxins due to their large lung surface area and high respiratory demand, meaning that even low level exposure can result in significant respiratory damage.
- Even low level exposure to airborne pollutants can damage equine respiratory tissue, increasing the risk of conditions such as asthma and inflammatory airways disease, which are known to be performance limiting and commercially significant in bloodstock operations.
- In fire and emergency situations, horses at pasture cannot be safely controlled, and serious injuries frequently arise not from direct exposure but from panicked herd flight, with animals galloping blindly and sustaining trauma.

- Evidence from comparable incidents demonstrates that toxic plumes from battery fires can extend over several miles, meaning impacts cannot be confirmed to the immediate boundary. *(Moss landing USA requiring 7km exclusion zone)*
- Report confirms that the presence of large scale battery infrastructure in close proximity to stud farms is likely to undemand confidence in the area, discouraging the placement of high value bloodstock and affecting long term industry viability.

Construction Noise report:

Developer-led technical evidence confirms that horses are highly sensitive to sudden noise, movement and vibration, and that these stimuli can trigger flight responses. It also confirms that there is no standard methodology for assessing construction noise impacts on horses and that mitigation must be tailored to individual receptors with input from equine specialists. This highlights a fundamental gap in the Lime Down assessment, which applies generic human-based noise thresholds and does not include any meaningful equine-specific or veterinary-led evaluation.

- Even developer-led technical assessments confirm that sudden noise and movement are key triggers for equine flight response.
- The evidence confirms that there is no established methodology for assessing construction noise impacts on horses, and that such impacts are typically only considered after concerns are raised during examination
- Evidence shows that horses vary significantly in their sensitivity to noise, requiring receptor-specific assessment and mitigation rather than a generic approach
- Horses perceive sound differently from humans, with a wider hearing range and heightened sensitivity to frequencies commonly produced by construction and electrical infrastructure
- Emerging evidence indicates that horses can detect and respond to vibration from machinery and vehicles, yet this has not been meaningfully assessed
- Proposed mitigation relies on stopping works or relocating horses, which is not feasible in continuous breeding and grazing environments
- The evidence confirms that effective mitigation requires equine veterinary expertise, reinforcing the absence of such input in the Lime Down assessment.

A separate summary version of this representation will be provided in line with the 10% length guidance.