

LIME DOWN SOLAR PROJECT

WRITTEN REPRESENTATIONS

STOP LIME DOWN: SUMMARY

Prepared for Deadline 1

May 2026



Summary of Written Representation

Introduction

1. This document summarises the Written Representation and appendices submitted by Stop Lime Down (“SLD”) in relation to the Examination of the Lime Down Solar Project (“the Scheme”). SLD’s representations support its position that the application by Lime Down Solar Park Limited (“the Applicant”) should be refused development consent.
2. This document is necessarily summary only, and does not attempt to repeat the full contents of the Written Representation and the appendices. The full detail of SLD’s position can be found in those documents.
3. The Written Representation sets out SLD’s case at Deadline 1. It also provides comments on the draft Development Consent Order which are not included in this summary.
4. SLD are a non-profit community campaign group comprised of local residents of Wiltshire and South Gloucestershire who oppose the Scheme. It is supported by both legal advisors, and a number of experts in different fields, that have assisted in the production of the Written Representation.
5. SLD supports renewable energy in principle, but consider that this Scheme in the proposed location causes too much harm to local communities and the environment. SLD invites the Examining Authority (“ExA”) to make a recommendation to the Secretary of State (“SoS”) that development consent not be granted for the Scheme.
6. The introductory section to the Written Representation provides a table which details all of the appendices submitted by SLD.

Site Selection and Alternatives

7. SLD consider that the approach adopted to site selection has been inappropriate and indicates a failure to “avoid” harmful effects; the first step in the mitigation hierarchy. Policy supports such avoidance, and having a proper assessment of alternatives which engages with these issues is a threshold requirement for the Environmental Statement. Given the proximity of the

Cotswolds National Landscape (“CNL”), the duty to “*seek to further the purpose of conserving and enhancing the natural beauty of*” National Landscapes is relevant to selection as well.

8. The Applicant has made two key errors in the way it has conducted its site selection process. The first key error is that the Applicant has not redrawn its Potential Development Areas (“PDAs”) as it has conducted the selection process. This means that PDAs selected earlier in the process are at a material disadvantage compared to PDAs selected later, as they have been drawn against more onerous constraints. While the Applicant has compared all PDAs against the same criteria to determine where to take the proposal forwards, because PDAs did not begin from comparable starting points this is comparing ‘apples to pears’.
9. The second error is that the Applicant has not properly engaged with the opportunity to combine PDAs. Given the proximity of various of the PDAs, this was clearly an error. Had the Applicant done this (for example) in respect of PDAs 5, 6, and 11, the combined PDA would have measured 1,482ha and provided around 400ha for mitigation. The failure to properly consider such combinations is again a key flaw in the analysis.
10. As to the substance of the site selection process, SLD has conducted a reanalysis of the PDAs against the Applicant’s criteria. Contrary to the conclusions it reached, the PDA for the Scheme was the lowest scoring PDA and should have been rejected on that basis.

Landscape and Visual Impact

11. SLD’s expert (Carly Tinkler) has conducted a review of the Applicant’s landscape and visual impact submissions. She comes to conclusions which identify considerably more harmful effects from the Scheme than were identified by the Applicant. Such effects are, in EIA terms, Major adverse (significant) effects, and stem from a mixture of methodological failings, the failure to consider the full range of effects that go to the question of a proposal changing the landscape, and an inherent underestimation of effects (including omitting to consider the negative impacts of mitigation).

12. The report also addresses the CNL in detail, as a landscape that benefits from the highest level of policy protection. Ms Tinkler identifies that there are, in EIA terms, significant direct and indirect effects on the CNL, including from visual effects but also from the routing of traffic directly through the CNL.
13. Ms Tinkler also identifies significant amenity effects related to public rights of way (“PRoWs”), unacceptable impacts on dwellings and the people who live in them, significant glint and glare effects, and disagrees with the approach to cumulative effects adopted.

Cultural Heritage

14. SLD’s Expert (Marrons) has conducted a review of the Applicants heritage assessment. They have come to the conclusion that both in archaeological terms and also in built heritage terms the Applicant has failed properly to identify significant (in EIA terms) effects on heritage assets. This stems primarily from a failure properly to understand the assets and their setting (e.g. the Fosse Way, and Bradfield Manor), and also a failure to take into account the range of environmental effects that can harm the significance of a heritage asset.
15. In respect of archology, Marrons identify that the Fosse Way is a particularly sensitive and valuable asset, and that there has been a failure to appreciate this when assessing the Scheme proposal. In addition, the Applicant has made heavy use of strip, map, and record without recognising that such a mitigation measure still results in some harm to the archaeological asset. As a result, significant effects in EIA terms are identified.
16. In respect of built heritage, Marrons identify a Major/Moderate adverse effect on Bradfield Manor (a Grade I listed building) as a result of the change of the setting of that asset (including as a result of much of its historic agricultural lands being used for solar, the noise effects, and the incongruous nature of the Scheme nearby to such an asset). A significant effect (at Moderate) is also identified at Norton Manor (a Grade II* listed asset). Other effects also not identified by the Applicant (due to noise and traffic) were explained in the paper, but were not significant in EIA terms.

Transport and Traffic

17. SLD's expert (Railton TPC) has conducted a review of the Applicant's transport assessment. As a result, various dangerous effects of the Scheme have been identified which weigh heavily against the grant of development consent. Many such effects arise from the proposal to use narrow rural lanes for HGV traffic which will struggle to get past both other HGVs but also (more importantly) pedestrians, cyclists, and other users of the road who are at safety risk.
18. It is also apparent that the Applicant has substantially underestimated the HGV trip generation produced by the Scheme. Railton TPC identify on their assessment that there was a 152%+ difference between the figure adopted by the Applicant and the figure adopted by them. That is a striking difference and is indicative of various flaws in the transport assessment method. Digging into these figures, it also means that some routes (e.g. the Fosse Way) experience a total 687% increase in the number of HGVs compared against the existing figures.
19. The report goes on to assess various villages around the Scheme, and to identify up to Major adverse significant effects (in EIA terms) as a result of construction traffic. Alongside this, there is also considerable harm to the tranquillity of the CNL through which one of the construction traffic routes runs. This all weighs heavily in the balance against the Scheme.

Glint and Glare

20. SLD's expert (Straten Consulting Services Ltd) has raised significant concerns about the glint and glare assessment. Aside from the assessment being opaque (as neither the underlying evidence base for the assessment, nor a quantitative basis for assessing significance is given), locations on roads and on railways are identified as being the subject of several hundred hours of "yellow" glare (such glare being capable of leaving an after-image in the sight line and, as a result, posing a considerable safety concern). This effect is particularly large as a result of the size of the Scheme, and also as a result of the use of tracking panels measuring 4.5m in height.

Noise Impacts

21. SLD's expert (Clarke Saunders Associates Ltd) has identified various flaws in the noise assessment conducted by the Applicant. In the first place, the Applicant itself recognises various significant observed adverse effect level ("SOAEL") and lowest observed adverse effect level ("LOAEL") effects as a result of the construction phase of the Scheme.
22. More pertinently, both the approach to the quantification and description of the background noise for the Scheme, but also the fixing of a base level of noise well in excess of that of the tranquil location that the Scheme is proposed, has skewed the noise assessment and results in noticeable noise effects which (due to the problematic approach to assessment) do not surpass SOAEL. That does not properly reflect the extent of the noise impacts that residents and visitors will experience, and also results in an underplaying of the impact on heritage assets also the subject of those noise effects (to which, see the Cultural Heritage section). The Applicant has also demurred from properly assessing effects on PRoWs.
23. The Applicant has indicated that, in respect of Bradfield Manor (the Grade 1 listed building), it will undertake to keep the noise effects of the Scheme just below the SOAEL level. However, this demonstrates that the Applicant is failing properly to engage with the duty to mitigate effects at or above LOAEL. This approach to noise policy, out of line with the Noise Policy Statement for England, will result in a noticeable and very undesirable effect on the local area.

Water Environment

24. Professor Skeffington has conducted a review of various aspects of the water environment and flood assessment conducted by the Applicant. Professor Skeffington identifies that the Applicant has failed to properly engage with the current evidence on the effects of solar farms on flooding and run-off generally, and also (critically) in a location like the Scheme where flood effects are already present and infiltration is limited. That is in addition to the reduced evaporative effects which the Scheme will cause. He considers that the approach to the flood risk assessment itself is flawed for its lack of information, and reliance on less than appropriate data sets. He also identifies that, while the Applicant

accepts it has failed the sequential test, its approach to the exception test also fails to meet the standard.

Land Use and Soils

25. SLD's expert (Landscape) have various concerns about the effect of the Scheme on agricultural land and soils. The Applicant itself recognises that, for the life of the Scheme, 240ha of best and most versatile agricultural land is out of production for over 60 years. That is in addition to the unassessed aspects of the cable route. That is important because the Applicant's justification for the use of agricultural land is inadequate. Landscape also identifies that proposals for livestock grazing are unlikely to be successful.

26. Importantly, the nature of the soils upon which the Scheme is proposed is also noted. It is likely that there will be damages to these soils, which are clay or heavy clay-loam and thus highly susceptible to damage. The Applicant's proposals are inadequate regarding their susceptibility to compaction, and ultimately such soils are not easy to remediate. This is reflective, generally, of the Applicant's overly optimistic approach to mitigation.

Biodiversity, Ecology and the Natural Environment

27. SLD's expert (Betts Ecology) have analysed the Applicant's ecology work and identify a persistent theme throughout of a lack of surveying and information. This is important as, to properly "avoid" ecologically sensitive receptors, it is necessary to know what is present. This is a flaw with the Applicant's approach of assuming the presence of everything, and is a material deficiency which will make mitigation of effects difficult. Ultimately, broad assumptions as to presence does not make for an effective mitigation strategy.

28. As to the cable route, the same complaint can be made that the Applicant has failed to undertake species specific surveys. The Applicant's response is that a 50m buffer is proposed for the cable but it is unclear whether this can work in principle, and the approach the Applicant has adopted is opaque and does not actually explain how it will approach micro-siting to avoid effects. SLD reserve its right to comment further on any further surveys if/when they come forward.

29. Betts also identify other concerns including the effects of road widening and the loss of boundary features (including, but far from limited to, hedgerows). And they identify a methodological concern that the Applicant persistently fails to assess or assess properly effects on the basis that they are temporary (without recognising that temporary does not necessarily mean negligible).

Socioeconomics and Tourism

30. SLD identifies wide-ranging socioeconomic impacts which it considers are likely to be a significant adverse effect. At the OFH in April 2026 a number of examples were proffered, and SLD considers it key (taking into account the Council's own assessment of economic harm) that this issue is recognised as a weight against the Scheme. It is also important to recognise the other environmental harms here can deter visitors and reduce tourism income as a result. SLD considers that the Applicant's view that there will be economic benefits of the Scheme overall is misplaced.

Health

31. Dr Osmond identifies that health is a cross-cutting issue relating to the Scheme. Green space is of great importance in respect of mental health, and this is supported by the evidence both at the OFH but also in Appendix Y to the Written Representation (which indicates the way residents use PRoWs and open space to support themselves). By its disaggregated nature, the Scheme causes fragmenting between villages and a feeling of isolation. It is also important to note that a number of the environmental effects identified elsewhere in the Written Representation have health impacts (e.g. noise, the health effects of which are recognised at para 5.12.1 of NPS EN-1).

32. Professors Dobson and Skeffington also considers the health effects of BESS fire and air quality, and identifies underestimation of effects as a result of a flawed methodology. He concludes that the Applicant's assessment gives an impression of safety but fails to consider objective risk and the reasonable worst-case scenario.

Climate Impacts

33. SLD's experts (the University of Derby) have conducted a review of the Applicant's greenhouse gas ("GHG") emission assessment and have also considered when the Scheme will break even against the carbon involved in its construction (comparing against the National Grid's GHG intensity). The report notes that, even applying a fixed GHG intensity set in 2029, depending on the approach to assessment the "break even" point for the Scheme is in the 2060s or 2070s. However, if the GHG intensity is allowed to change over time (to, in some way, reflect the estimates that the Grid will decarbonise over time) the Scheme becomes a net emitter over its lifetime.

34. The review also identifies underestimations in the assessment of embedded carbon involved in the Scheme.

Cumulative and In-Combination Effects

35. SLD consider that the Applicant has failed to engage in the full rigour of an assessment of cumulative and in-combination effects. Not only do many of its assessments (e.g. traffic) fail properly to identify all of the effects from the development interacting with itself, but also from other development outside of the Order Limits. The Applicant also fails properly to engage with how individual effects combine to industrialise the area around the Scheme. This can be quite clearly identified at the Grain Barn on Pig Lane (where dwellings experience solar on all sides), Bradfield Manor (where noise and views cause significant harm to a Grade 1 listed heritage asset), and PRoWs such as WT/HULL/1 which are surrounded by solar and noise effects for a significant length. It is the coming together of all of these effects which ultimately results in that industrialisation.

Planning

36. SLD's experts (Marrons) have considered the evidence that has been produced by SLD for Deadline 1 and considered how the planning balance should be approached. They have identified a number of substantial weights in the planning balance against the Scheme, including landscape effects, heritage effects, traffic and transport effects, and glint and glare. They also note various significant effects against the scheme, including noise and vibration, and flood risk and drainage. This weighs in the balance against positives of the Scheme,

most notably the substantial weight in favour of renewable energy identified in NPS EN-1 and the Critical National Priority infrastructure (“CNP”) presumption.

37. Marrons’ analysis of the evidence leads them to a number of key conclusions. First, they identify that the failure of the Applicant properly to mitigate the effects of the Scheme means that the CNP presumption does not apply at all (pursuant to NPS EN-1 para 4.2.14). On a flat balance basis, Marrons consider that the harms of the Scheme clearly outweigh the benefits and that development consent should be withheld.

38. However, Marrons go on to consider the case where the CNP presumption applies. They note the high policy test for refusal in such circumstances, but also identify that there are exceptions for risks to human health and public safety. Those exceptions apply in this case given the substantial weight against the Scheme as a result of traffic and transport effects, and also glint and glare effects. Thus, again Marrons conclude that development consent should be withheld.

39. Finally, Marrons consider the position if the CNP presumption applies with its full rigour. They note that, for a refusal of permission in such circumstances, the position must be exceptional. However, noting the various factors weighing for and against the Scheme, and particularly the various substantial factors pointing away from consent, they conclude that this is an exceptional case where development consent should be withheld.

Conclusion

40. SLD commends its evidence to the ExA and to the SoS. SLD recognises the pressing need for renewable energy in the UK, and why solar can contribute to this. However, SLD consider this to be the wrong scheme in the wrong place. Currently, this area of the Cotswolds is rural and tranquil, in the setting of the CNL, and with a good selection of PRowS and routes attracting a host of residents and visitors alike to walk, ride, cycle, and enjoy all that the villages and countryside have to offer. The Scheme proposes the industrialisation of that place, bringing an incongruous form of development which substantially and negatively effects everyone that enjoys the location today. SLD invites the

ExA to recommend to the SoS to withhold development consent, and SLD invites the SoS to withhold that consent.