



Procedural Deadline 1A Submission

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Stop Lime Down – Deadline 1A: Post-Hearing Submissions

1. In line with the deadline for post-hearing submissions set out in the Rule 8 letter, Stop Lime Down (**SLD**) provides the following post-hearing submissions in relation to the Preliminary Meeting held on 21 April 2026 and ISH 1 on 22 April 2026. This submission is in summary only, and also does not repeat the content of SLD's Procedural Deadline A submission [**PDA-012**] or the content now included in SLD's Written Representation.
2. While SLD was in attendance at OFH1 on 21 April 2026 to hear submissions, an oral submission on behalf of the group was not made at that stage. At Deadline 1 SLD was registered in its group capacity to speak at OFH2.

Preliminary Meeting (**PM**)

3. SLD attended the PM represented by Daniel Kozelko and Celia Reynolds (of Counsel). Mr Kozelko introduced SLD and indicated that the groups formal title is SLD Wiltshire Limited, but that throughout the Examination the group should be referred to as "Stop Lime Down" or "SLD".
4. Under **Item 3**, SLD sought confirmation that those items in the Initial Assessment of Principal Issues would be examined both in relation to the principal solar sites (Lime Down A to E), but also in respect of the 400kV cable corridor.

5. Under **Item 4** SLD made a number of points. The first was to invite the ExA to provide details early of what hearings would be held and when in the w/c 29 June 2026. The second was to align SLD with the position of Wiltshire Council (**the Council**) in seeking (inter alia) an additional week of hearings (even if only on a precautionary basis). The third was to invite the Council to provide comments on the Written Representation of SLD at Deadline 2 (in light of the Examining Authority's (**ExA**) guidance to the Council on what it might address in its Deadline 2 comments on Written Representations). The fourth was to invite that final statements of common ground be delayed to Deadline 8. The fifth was to align SLD with the Council's position on what topics might usefully be the subject of ISHs (on which the Council identified highways and transport, landscape and visual impact, ecology and biodiversity, flood risk and drainage), and to add to the list: heritage, noise, greenhouse gas emissions, glint and glare, socioeconomic effects, alternatives, and another hearing on the DCO text (in addition to that listed in ISH1).
6. **Post-hearing comment:** SLD's Written Representation has now been submitted at Deadline 1, and it is hoped that that document provides the underlying details why SLD considers ISHs on the various topics identified by it and the Council would be useful and appropriate. However, SLD recognises that ISHs are for the purposes of assisting the ExA in considering the Application, and that written submissions have the same weight as oral submissions. As such, SLD will participate in whatever format for receiving submissions is considered appropriate by the ExA.
7. Under **Item 5** SLD noted and agreed with the submissions of the Applicant concerning the utility of a Statement of Common Ground (**SoCG**) between the Applicant and SLD. SLD noted that it would not be useful to simply repeat matters of disagreement, but rather to look at points of agreement. SLD welcomed the indication from the ExA that such a SoCG should be explored.
8. Under **Item 6** SLD noted that there had been difficulty earlier in the morning in the press attending the hearing (as they had been turned away on the basis that they had not signed up in advance of the hearing). SLD invited a direction that a slot be kept open for attendance by the press as there are matters of transparency and access of the public to information that are assisted by press attendance. SLD welcomed the subsequent submissions from the Council affirming that submission from SLD.
9. **Post-hearing comment:** subsequent to the hearing the ExA issued its Rule 8 letter. SLD welcome (inter alia) the changes made to the timetable there, including in the addition of a further week held for possible hearings. SLD also

welcome the indication of hearing types in the w/c 29 June 2026, and note that any advanced warning of the content of agendas would allow all parties to ensure that their instructed experts can arrange to be in attendance. SLD also welcome the procedural decision for a SoCG between it and the Applicant.

Issue Specific Hearing 1 (ISH1)

10. SLD attended ISH1 represented by Daniel Kozelko and Celia Reynolds (of Counsel).
11. Under **Item 3**, SLD raised two matters arising out of questions asked by the ExA. The first invited a direction that the design principles document be updated to identify from where the height of the 13 meter structures within the Scheme where measured. The second invited the Applicant to explain how it had distinguished between Grade 3a and 3b land when in the site selection process. This was because the former is identified as best and most versatile agricultural land in policy but the latter is not.
12. Under **Item 4**, SLD noted that there would be an opportunity to provide detailed comment on the DCO text in the future.
13. **Post-hearing comment:** SLD notes that in section 16 of its Written Representation it has provided some of that detailed comment on the draft DCO available prior to Deadline 1.
14. However, under **Item 4** SLD did also raise concerns about the Applicant's suggested modifications to address staged commencement and decommissioning of different parts of the Scheme. SLD raised the concern that this could result in a Scheme which is in situ far longer than its headline lifetime, and suggested one possible option would be the inclusion of a longstop date in the DCO. SLD noted that the Applicant would be coming forward with an amended wording and will comment upon this when it becomes available. SLD also noted that the Applicant will be coming forwards with a phasing and construction requirement to be overseen by the Council and will comment upon this when it becomes available.
15. In respect of the compulsory acquisition powers, SLD asked about the relationship between the period within which those powers could be used and the lease agreements for the principal PV sites for the Scheme (Lime Down A-E). The Applicant confirmed it did not have 60-year agreements for all of the principal PV sites. The ExA noted that this may raise a question about the period for which the benefits of the Scheme are secured, and queried how this information was captured. The Applicant stated that those agreements are

confidential but that it would need to liaise with relevant landowners. SLD also noted and agreed with the ExA's question that this would go to the weight to be given to the benefits of the Scheme.

16. Under **Item 5**, SLD raised three initial points (being conscious of time). The first was to build on a request of the ExA that a figure be provided for transmission losses for electricity generated by the Scheme and sent to the National Grid, asking if a figure for losses could also be provided for a round trip from and to the National Grid (accounting for the fact that the Scheme would sometimes charge the BESS from the Grid). The second was to highlight the concern that the Scheme proposes the use of tracker panels yet fixed south-facing panels (which are likely to have a lower environmental impacts) are currently predicted to generate more electricity for the Scheme. SLD noted that, in such circumstances, it is difficult to understand how the proposal complied with the mitigation hierarchy and particularly the requirement to "avoid" (noting the requirements of para 4.2.14 of NPS EN-1). SLD noted that it may invite the ExA in the future to provide direction limiting the panels which could be used within the Scheme (particularly given the Scheme has significant negative effects in EIA terms). The third was to note SLD's concerns about defects in the site selection process and to set them out in summary.
17. **Post-hearing comment:** in its Written Representation at para 16.2.2 SLD has noted that a requirement could be imposed in the DCO and Design Principles and Parameters to secure smaller solar panels. That is because smaller fixed panels could make a difference in avoiding and mitigating effects. In respect of SLD's concerns about the site selection process, this is now set out in detail in section 2 of SLD's Written Representation and the paper at Appendix L.
18. Also under **Item 5**, another Interested Party raised a concern once again about the leases secured for the Scheme land. The Applicant commented that such agreements were confidential. SLD responded that the terms of any agreement were voluntarily entered into by the Applicant, and that a decision to rely on such confidentiality in the Examination was a matter for it. However, SLD also noted that it is the Applicant that is positively advancing the Scheme and needs to evidence its position. The Applicant suggested that SLD was inviting it to breach a contractual term. The ExA explained that SLD was not asking for a contractual term to be breached, but that it is pertinent to whether the benefits of the Scheme can be secured for the requisite period. SLD agreed.
19. **Post-hearing comment:** the question of the length of any agreements and the security of the term of the development is dealt with in section 16 of SLD's Written Representation in more detail. Among other things, it explains the difficulty caused by an indeterminate length of Scheme from the perspective of

assessing positive and negative effects in EIA terms. For example, if a site which secures certain mitigations is decommissioned early, that will fundamentally change the likely significant environmental effects of the remainder of the Scheme. SLD agrees with the query of the ExA considering how that information might be captured. SLD repeats the point that a party producing an Environmental Statement and inviting findings from a decision-maker must provide sufficient information to support that Environmental Statement (and that a contractual confidentiality clause freely entered is not a proper basis for such an Environmental Statement to have key omissions).

20. **Item 6** of the agenda for ISH1 was not considered at the hearing.

21. **Post-hearing comment:** SLD would welcome Item 6 from the agenda to ISH1 being addressed at another hearing. Among other things, that item would address the issues of grid connection secured with NESO and the relationship between the BESS and the generating aspect of the Scheme. Both of these matters are addressed in Section 16 of SLD's Written Representation. SLD also would welcome the Applicant providing the information set out in Item 6.2 of the agenda at a subsequent hearing (or in writing).

END

Stop Lime Down: Procedural Deadline 1A Submission.