

Lime Down Solar Park

**Planning Inspectorate Reference:
EN010168**

**Wiltshire Council Comments on Written
Representations**

Deadline 2 (22 May 2026)

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1. Historic England Written Representation [[REP1-152](#)]

- 1.1. This representation refers to the 9.20 ES Technical Addendum to Chapter 12 Cultural Heritage – Bradfield Manor Visualisations (Rev 1) [[REP1A-014](#)] submitted by the Applicant at Deadline 1A. The council agrees with the representation and the conclusion reached.

2. Stop Lime Down Written Representation [[REP1-167](#) to [REP1-188](#)]

- 2.1. The council generally concurs with the landscape and visual points raised. However, the view expressed in **Paragraph 3.5.5** [[REP1-167](#)] that the landscape sensitivity decreases from west to east is considered too simplistic as it does not take account of localised variations in value and susceptibility to change. The council agrees **Paragraph 3.5.6** Visual Receptor Sensitivity and the view expressed that the Applicant has conflated landscape fabric with landscape character.
- 2.2. The council considers that **Paragraph 3.8.16** makes a valid point regarding the double counting of mitigation measures, and one that the council has mentioned previously within its Relevant Representation [[RR-4934](#)] alongside the potential for mitigation to be inappropriate (across the project area not just the setting of the Cotswolds National Landscape).
- 2.3. The council also agrees with issues relating to visual amenity in **Paragraph 3.10** and Cumulative Effects in **Paragraph 3.12**.
- 2.4. Furthermore, the council agrees with the points made about over-reliance on existing vegetation providing screening throughout the whole operational lifespan of development in **Paragraph 7.5**. The future management of 3rd party hedgerows and woodland over the very large project area would reasonably and foreseeably include periodic hedgerow reductions cutting / laying, harvesting timber from managed woodland, or tree loss through disease or climatic effect etc.

- 2.5. Overall, from a landscape and visual perspective the council agrees with the findings of the SLD report which largely mirror the council's concerns.
- 2.6. With respect to economic impacts, Wiltshire Council have asked the Applicant to implement schemes that are hoped will further mitigate the economic impact of the solar park scheme. These include the provision of a visitor centre to help tourism and a compensation scheme for businesses that can show a reduction in income of over 10% during the construction and decommissioning periods and for one extra year after each event.

Appendix A (Planning Position Statement) [REP1-169]

- 2.7. It is considered that this document provides a useful summary of the scheme and potential issues.

Appendix B (Landscape and Visual Impact Report) [REP1-170]

- 2.8. This is a highly detailed document which largely follows the concerns raised by the council and other parties in respect of landscape and visual issues. Of particular interest is the section on Cumulative Effects, which builds on the concerns that the council and other interested parties have highlighted and agrees with the Wiltshire Council stance that the cumulative effects have not been properly addressed and that they have been downplayed significantly, having failed to deal with cumulative landscape effects, or sequential intra project visual effects.

Appendix C (Heritage and Archaeology Report) [REP1-171]

- 2.9. In **Paragraphs 3.7 to 3.10**, Marrons express the view that the Fosse Way has been under assessed. The route of the former Roman road has been heavily impacted by later development and exists as a landscape feature that will remain in the landscape following the completion of the scheme. Wiltshire Council Archaeology Service (WCAS) considers that there is no direct impact on the Roman road itself, which has already been heavily impacted by modern road construction. It's relationship to the archaeological sites identified by the geophysical survey will remain unchanged if the solar farm is constructed, as the heritage assets to the southeast of the road are sub-surface features, so there will be no visual impact to their relationship, which is purely spatial. Those sites impacted by development will be preserved by record, knowledge which will add to understanding of the landscape. Overall, WCAS consider that construction will result in a negligible effect level of significance.
- 2.10. With respect to **Paragraph 3.11**, WCAS agree that the 6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232] have a degree of inconsistency regarding areas of 'non-intrusive construction methodology'.
- 2.11. Furthermore, WCAS agree that the use of concrete feet or piles do not eliminate the impact on below ground remains (**Paragraph 3.12**).

- 2.12. In **Paragraph 3.20**, Marrons consider that Strip, Map and Record (SMR) excavation of sites C13-01, F46-01 and O48-01, as preservation by record, will mitigate harm, not eliminate it to a low magnitude of effects. However, the WCAS consider that excavation of an archaeological site to CIFA and WCAS standards will substantially reduce the effect of impact upon archaeological sites of Local and Regional importance (as is the case with sites identified within the proposed development to date). This assumption is the basis for all mitigation works carried out in Wiltshire ahead of construction.
- 2.13. With respect to the conclusion in **Paragraph 3.21**, WCAS consider that the completion of SMS excavations of site D24-01 and the full publication of the results will result in a negligible effect.
- 2.14. WCAS share the concerns expressed by Marrons in **Paragraphs 3.22 to 3.25** regarding what mitigation will be proposed in the event that Horizontal Directional Drilling (HDD) will not be possible. WCAS are awaiting a response from the Applicant regarding whether HDD will be deployed near to the Pillow Mound site.
- 2.15. With respect to **Paragraph 4.6**, WCAS agree that the impacts of the scheme have not been fully assessed, particularly regarding the cable route, although it is accepted that the archaeological contractors commissioned by the Applicant to carry out the work have been hampered by access issues. However, WCAS does not consider that the level of impacts stated by the Applicant are too low. Furthermore, WCAS agrees that the present mitigation measures are not sufficient to mitigate the impact of the proposals and that these measures need to be expanded, both in relation to scoping out sites and in the need to excavated areas of archaeological significant that will be impacted by development. This is as stated within the council's Local Impact Report [[REP1-137](#)].

Appendix D (Transport Report) [[REP1-172](#)]

Section 2: Impact on Rural Lanes

- 2.16. This part of the report focuses on the impact of the construction vehicle trafficking, notably HGVs, on the rural lanes forming parts of the construction routes to Lime Down areas A-C and Lime Down area D. This considers the 'sensitivity' of the impacts and the ability of vehicles to pass, so the highway safety implications. Wiltshire Council has already raised safety and operational concerns about the ability of two HGVs, or even an HGV / car, to pass along some of the narrow rural roads proposed for access to the Lime Down PV sites, so these concerns are shared. Notwithstanding this, the council's Highways Development Management (HDM) Officer makes comments against some of the SLD points raised in dialogue below. In doing so in an HDM capacity, the comments are focused on the Solar Farm PV sites and not the temporary highway works at specific locations along the cable route corridor and access needed to these.

- 2.17. **Paragraph 2.8** makes the point that a carriageway width of 5.5m is needed to 'just' allow passage of two HGVs (MfS), albeit at a very low speed. It is further stated that at widths of less than 5.5m, HGVs will be required to mount adjacent verges of footways or potentially reverse to a sufficient point where passage is possible. The highway safety and damage implications of this are already fully recognised by the council and have been made clear in both its Relevant Representation [[RR-4934](#)] and follow-up Written Representation [[REP1-138](#)].
- 2.18. **Paragraph 2.9** makes the point that whilst it is possible to include passing places for HGVs, these must be of sufficient length (25m) to allow this, whilst there must be suitable inter-visibility between adjacent passing points. This is all supported. The first issue of the Transport Assessment [[APP-233](#)] included no swept path passage assessments for two opposing HGVs on any of the narrow minor roads being proposed for construction access, or indeed any proposals for passing places. However, the latest Revision 2 of the Transport Assessment [[REP1-057](#) and [REP1-059](#)] now includes passing place proposals for Alderton Road in Annex I, whilst Appendix K includes the swept path analyses for two opposing HGVs. The council has commented in depth on the content of both these new appendices in reviewing the latest DCO documents submitted by the applicant at Deadline 1 (see separate submission at Deadline 2). Those comments are not reiterated here but the council would make the point that the passing place proposals along Alderton Road are very 'high level' and would require a lot more detail for technical approval. Furthermore, it is considered there is need for passing place mitigation on some of the other rural roads which is still not being proposed.
- 2.19. **Paragraph 2.12** cites the HS2 'Design Approach' for rural road widths, where a 6.8m carriageway width is deemed desirable where buses and HGVs are likely to meet each other on a regular basis. Whilst the council's Highways Development Management Officer would not argue with the desirability of this, achieving this level of width upgrade along lengths of the minor roads proposed for construction access to the Lime Down PV sites is likely to be challenging, although in the work submitted to date the Applicant has provided little information on the typical existing widths along the rural lanes forming parts of the proposed construction routes. It is probable a 6.0m width would be deemed acceptable by the Council where HGV passing place upgrades are to be proposed and significant constraints upon improving on this width further exist.
- 2.20. In **Paragraph 2.21** the point is made that the Applicant dismisses quite high percentage increases in HGV flows on some of the minor rural roads, simply on the basis that the existing HGV flows are low without considering the absolute level of increase in HGV flows. This view is supported, as the resultant hourly frequency in 2-way HGV movements during the 9:30am-4:30pm period identified for deliveries is a significant factor. Taking Alderton Road as an example, the predicted 'peak' increase of 50 2-way HGV movements would relate to a frequency of circa 7-8 HGVs per hour during the working day, or a movement every 7-8 minutes. This does not appear to be an insignificant effect or impact on Grittleton when the level of movement frequency is considered. The fact that the existing daily HGV flow is only 20 seems immaterial.

- 2.21. **Paragraphs 2.23-2.24** discuss the proposed 'Booking System' for HGV deliveries, so timing of arrivals and departures. The Applicant's assertion that this will create a situation whereby "*it is unlikely that HGVs will cross each other on the local highway network*" is challenged and rebutted. This and the reasoning given is supported by the Council. It has always been the Council's view that this cannot be assumed despite best endeavors by the site management staff. As such, passage opportunities for opposing HGVs on all the minor roads being used for construction must be deemed adequate and, where lacking, appropriate mitigation measures proposed and put in place.
- 2.22. **Paragraph 2.33** makes the point that the Applicant's passage assessment as set out in Annex H of the first issue Transport Assessment [[APP-233](#)] is deficient, as it only considers the ability of an HGV and a car to pass, and so is not a 'reasonable' worst case. This point was also made in Wiltshire Council's Relevant Representation [[RR-4934](#)]. However, Annex K to the Revision 2 document [[REP1-057](#) and [REP1-059](#)] now includes swept path passage analyses for two 16.5m articulated HGVs. The council has commented on the content of this new Annex K separately in reviewing the latest Transport Assessment - May 2026 (see separate submission at Deadline 2).
- 2.23. **Paragraph 2.37** makes the point that the Highway Improvement Areas (HIA) do not include most of the length of the Fosse Way that is to be used, much of the road to Sherston north-west of the Fosse Way, the road east of Hullavington and roads around Grittleton, so failing to offer any opportunity for mitigation measures to improve 2-way HGV passage. This same point has been raised by the Council when reviewing the 'Works Plan' drawings [[REP1-005](#)].

Section 3: Review of Access Points

- 2.24. In **Paragraph 3.3** it is stated "*There are many instances where drivers leaving the sites do not have sufficient visibility to approaching vehicles to be able to safely pull out onto the highway. There are 24 instances where the Applicant is proposing the use of a banksman to overcome these visibility deficiencies. An alternative approach would be to remove roadside vegetation and trees to improve visibility.*" Extracts from Appeal decisions are then included where Inspectors dismissed the use of banksmen as a substitute to providing appropriate visibility. Access locations considered particularly problematic are then set out in **Paragraph 3.4**, most of which appear to be temporary construction accesses along the cable route corridor.
- 2.25. Wiltshire Council would support this view. In the latest OCTMP issued at Deadline 1 [[REP1-112](#)] it is also stated in paragraph 2.1.5 that "*During the construction phase, banksmen will be deployed at each access whenever construction vehicles are accessing or egressing the Order Limits. This will ensure the safe movement of construction vehicles in and out of the Solar PV Sites and will overcome any instances where the achievable visibility is below guidance, which is a factor at a small number of access locations*". The Council response to this is, for the avoidance of doubt, the use of bankmen will not be accepted as a substitute to providing the requisite visibility splays at the proposed access junctions where the Applicant has land control under the DCO

to do so. It may be necessary to employ temporary traffic control in other situations during the construction phase where visibility standards cannot be met. In short, safe egress should not rely on an operative stepping into the carriageway to establish whether opposing vehicles are present.

Section 4: Underestimate of HGV Trip Generation

- 2.26. This part of the report addresses the expected HGV trip generation and expressly makes the case that the Applicant's forecast of expected HGV volumes over the construction period are seriously underestimated. The SLD conclusion in **Table 4** is that, in their view, the more realistic estimate is 65,813 HGV movements over the two-year period, as opposed to the 26,086 HGV movements being predicted in the Transport Assessment, so a 152% uplift.
- 2.27. In making Highways Development Management comments on the latest Transport Assessment (Revision 2) - May 2026 [[REP1-057](#) and [REP1-059](#)], the council has raised similar concerns over some of the underlying assumptions which support the Transport Assessment HGV prediction in Table 13-12. In doing so, the council are seeking clarity from the Applicant on this, and indeed some validation or 'proving' where data for other solar farms exist. **Table 2** in the SLD report, which shows the typical HGV/ha ratios for PV Module / Mounting Structure deliveries at other solar array sites, is of concern, as what is assumed for Lime Down is clearly less than any of the other comparison sites by a considerable margin. Similarly, **Table 3** shows that the assumed number of HGV deliveries for Module Supporting Structures expressed as a percentage of those needed for the PV Modules is well below that assumed elsewhere.
- 2.28. The SLD report identifies concerns with all the following in respect of HGV deliveries:
- The number of PV Modules assumed (598,260) related to the total area of the site containing modules (Work No 1) of 748ha. Based on SLD calculations this pre-supposes that only 38.6% of the said area would be occupied by modules, which does seem low.
 - Module Mounting Structures.
 - Waste disposal.
 - Substation / BESS works, and notably concrete foundation depths / areas.
 - Access trackways.
 - Construction compounds and allowance.
 - Treatment of topsoil.
- 2.29. The Wiltshire Highways (HDM) team have also discussed elements of this with Railton TPC Ltd in meetings prior to the SLD Written Representation being

submitted. This has been taken into account by the council in reaching its own position and stated points of concern with the Applicant's estimate of HGV movements expected over the construction period.

Section 5: Magnitude of Impact of Construction Traffic

2.30. In **Paragraph 5.1** it is stated "*The Applicant provides a table showing the assignment of construction vehicles associated with the solar array sites but does not provide a flow diagram representing this spatially*". A flow diagram is thus included as Appendix 5 to the report. However, Annex F in the latest Transport Assessment [[REP1-057](#) and [REP1-059](#)] does now include HGV flow diagrams for the average day and 'peak' day. Separate comment has been made on the content of this Annex F in the council's submission on comments on submissions at Deadlines 1 and 1A, so the council's Highways Development Management Officer does not comment on **Appendix 5** to the Appendix D Transport Report (SLD) [[REP1-172](#)]. However, mindful of the ongoing queries concerning the predicted number of HGV deliveries, it would seem premature to comment in detail on any HGV link flow diagrams at this time.

Section 7: Impact of Vulnerable Road Users

2.31. In **Paragraph 7.3** it is stated "*The Applicant makes an assumption, based on a lack of infrastructure that NMU flows are low. It is suggested there have been observations, but no information is provided as to where and when these observations were made and for how long.*" This view is generally supported, but the council is equally aware that the level of general NMU usage of the rural lanes in the area could be quite seasonal or, for example, more prevalent during the weekends than on a typical weekday. Notwithstanding this, it is considered and agreed that a more robust assessment on NMU usage should have been undertaken where sections of the lanes proposed for HGV construction access are very narrow, or where the road edges lack any verges so requiring pedestrians to remain within the carriageway. In the case of cyclists or equestrians this would potentially remain the case anyway, with horse riders likely to be particularly impacted by the presence of HGVs. In the case of the latter, simple consultation with equestrian groups would have quickly established the rural lanes commonly used by horse riders. **Paragraph 7.4** makes the same point so "*No comment is made on whether equestrians use the network that is affected by construction traffic*".

Section 8: Impact on Villages

Hullavington

2.32. The report considers that given the level of construction traffic predicted to use the road east of Hullavington and Bradfield Cottages to access Lime Down area D, it is possible that drivers could seek alternative routes to avoid delays and risks resulting from the significantly increased HGV usage of this route. As such, the potential use of The Street and Hill Hayes Lane as a diversion route is identified, which could result in increased traffic through Hullavington.

- 2.33. Whilst the use of part of The Street and Hill Hayes Lane could be used by light vehicle traffic as an avoidance Route, long lengths of Hill Hayes Lane have a narrow carriageway where passage for two cars is only possible at occasional passing places. It thus seems unlikely this would be a very attractive diversion route for many drivers, as meeting any opposing vehicles could result in similar delay issues in achieving 2-way passage. Whilst another diversion option could involve continuing along The Street to Grittleton and then turning north along Alderton Road / Fosse Way, this would simply lead to conflicts with HGV construction traffic associated with Lime Down areas A-C.

Grittleton

- 2.34. The expected changes in 2-way HGV movements and the resultant hourly frequency between 9:30am and 4:30pm along Alderton Road through Grittleton associated with the construction of the solar farm PV sites (A-C) would reasonably be considered 'High Sensitivity' based on the ISEP 'Severance' criteria alone. It is accepted The Street through Grittleton will be an even more sensitive part of the village to any increased trafficking by HGVs. The cable route access drawing for this area (Figure 13-12-1) does show the intended HGV access to the cable route access points 101 and 102 via The Street, and the establishment of a large compound east of Grittleton. Further access points off Neeld Court exist to the south (103 and 104). In the SLD Transport Report it is stated that "*The Applicant predicts 16 HGV movements per day through Grittleton based on an assumption that HGV movements would be spread evenly across all cable access points*" and "*the route through Grittleton is likely to receive far more than the average for all cable access points since it provides access to a compound*". The further point is made that the creation of the compound itself will generate additional HGV movements whilst "*The compound at Grittleton is also likely to be particularly important since it is likely to provide the only access to the cable route north of Grittleton as far as the avoidance area west of Surrendal Farm*". All these factors do suggest that the simple 'averaging' approach used by the Applicant to estimate HGV movements expected at each cable route access point is not likely to be applicable here. As such, the council would support the view that the HGV impact along The Street through Grittleton is being underestimated and so potentially flawed.

SUMMARY

- 2.35. Many of the highway concerns set out in the Stop Lime Down (SLD) Written Representation have already been voiced by the council in its own Relevant Representation [[RR-4934](#)], Local Impact Report [[REP1-137](#)] and Written Representation [[REP1-138](#)]. The council has raised similar concerns over some of the underlying assumptions which support the Transport Assessment HGV prediction in Table 13-12 of the Transport Assessment, this including the latest Revision 2 issued in May 2026 [[REP1-057](#) and [REP1-059](#)]. In doing so, the council is also seeking clarity from the Applicant on this, and indeed some validation or 'proving' where data for other solar farms exist. Wiltshire Council has also consistently raised safety and operational concerns about the ability of two HGVs, or even an HGV / car, to pass along some of the narrow rural

roads proposed for access to the Lime Down PV sites, so these concerns are shared. The first issue of the Transport Assessment, on which the SLD Written Representation comments are based, included no swept path passage assessments for two opposing HGVs on any of the narrow minor roads being proposed for construction access, or indeed any proposals for passing places. However, the latest Revision 2 of the Transport Assessment [[REP1-057](#) and [REP1-059](#)] now includes passing place proposals for Alderton Road in Annex I, whilst Appendix K includes the swept path analyses for two opposing HGVs. The council has commented in depth on the content of both these new appendices in reviewing the latest DCO documents submitted by the Applicant at Deadline 1 (see separate submission also submitted at Deadline 2). The passing place proposals along Alderton Road are very 'high level' and would require a lot more detail for Wiltshire Council technical approval. Furthermore, it is considered there is need for passing place mitigation on some of the other rural roads which is still not being proposed.

- 2.36. The SLD Written Representation asserts that “*No evidence is provided to support the assertion of low NMU flows*”. This view is generally supported, but the council is equally aware that the level of general NMU usage of the rural lanes in the area could be quite seasonal or, for example, more prevalent during the weekends than on a typical weekday. Notwithstanding this, it is considered and agreed that a more robust assessment on NMU usage should have been undertaken where sections of the lanes proposed for HGV construction access are very narrow, or where the road edges lack any verges so requiring pedestrians to remain within the carriageway. In the case of cyclists or equestrians this would potentially remain the case anyway, with horse riders likely to be particularly impacted by the presence of HGVs.
- 2.37. With regards to the specific impact on villages, the council would concur with the SLD view that the HGV trafficking impact of the cable route works on The Street in Grittleton could be underestimated. The establishment of the large compound east of Grittleton does suggest that the simple 'averaging' approach used by the Applicant to estimate HGV movements expected at each cable route access point is not likely to be applicable here. Furthermore, it would be expected that additional HGV trafficking would be needed in creating the compound itself. With regards to potential diversionary traffic impacts through The Street in Hullavington, and along Hill Hayes Lane, however the council does not consider that this is a substantive risk. Whilst the use of part of The Street and Hill Hayes Lane could be used by light vehicle traffic as an avoidance Route, long lengths of Hill Hayes Lane have a narrow carriageway where passage for two cars is only possible at occasional passing places. It thus seems unlikely this would be a very attractive diversion route for many drivers, as meeting any opposing vehicles could result in similar delay issues in achieving 2-way passage. Whilst another diversion option could involve continuing along The Street to Grittleton and then turning north along Alderton Road / Fosse Way, this would then simply lead to conflicts with HGV construction traffic associated with Lime Down areas A-C.

Appendix I1 (Human Health Impacts of Lime Down Solar Park) [\[REP1-180\]](#)

- 2.38. The proposed development raises notable concerns for public health and community wellbeing. The most significant issue identified is the potential impact on community identity and culture, which could lead to frustration, stress, anxiety, and associated mental health challenges for residents. These risks are particularly linked to poor community engagement during the construction phase, with similar concerns persisting through operational and decommissioning stages. To mitigate the impact on mental health and wellbeing, Wiltshire Council recommends enforceable requirements, including a comprehensive communication strategy with measurable outcomes and an Outline Decommissioning Strategy addressing community identity and resilience. These measures aim to safeguard wellbeing and ensure effective engagement throughout the project lifecycle. The communication strategy should be carried out in line with the Suffolk County Council NSIP Guidance.
- 2.39. It should be noted that the proposals will significantly impact the amenity of the countryside including public rights of way, recreational space, general environmental change and interferences with character of the area. There are also numerous concerns about other environmental issues such as noise, vibration, pollution, fire risks, flooding, construction traffic, and the mental impact from the detriment caused. Public Health recognise and share the concerns about the mental health impact from the range of stressors from the proposals. Although the mitigations are primarily sought by environmental controls and adjustments from other departments, Public Health strongly support all protections and mitigations to protect the mental health of the local population.

Appendix K2 (Soil Site Report) [\[REP1-185\]](#)

- 2.40. The council considers this report to provide a comprehensive assessment of the soil properties and capacities in the site. One area that may need further investigation by the Applicant is that due to the high clay content, the ground is more likely to move between wet and dry times, having an impact on foundations.

Appendix L (Site Selection and Alternative Sites Assessment) [\[REP1-186\]](#)

- 2.41. The council considers that an important point has been made in this document, specifically that although the Applicant states that the scheme is 'landscape led', which the council disputes, the Applicant refers to the selection as by 'willing landowners', thus putting environmental considerations as secondary.

3. Dermot Farrington [[REP1-202](#) to [REP1-204](#)] and January Farrington [[REP1-214](#) to [REP1-216](#)] Written Representations

- 3.1. As a result of these and other similar comments from equine businesses, Wiltshire Council have added a requirement into its Statement of Common Ground asking the Applicant to undertake an economic impact assessment on the equine sector within the affected area.