



# **Statement of Common Ground with Wiltshire Bridleways Association**

**May 2026**

**Revision 1**

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## Statement of Common Ground Signatures

This Statement of Common Ground has been prepared and agreed by Lime Down Solar Park Limited (the Applicant) and Wiltshire Bridleways Association.

Signed on behalf of Lime Down Solar Park Limited

Name:

Position:

Date:

Signature:

Signed by Wiltshire Bridleways Association

Name:

Position:

Date:

Signature

## **1 Introduction**

### **1.1 Purpose of this document**

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Lime Down Solar Park Development Consent Order (DCO) (the Application) made by Lime Down Solar Park Limited (the Applicant) to the Secretary of State for Energy Security & Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not yet been reached. SoCGs are an established means in the DCO consenting process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

### **1.2 Parties to this Statement of Common Ground**

- 1.2.1 This SoCG has been prepared by (1) Lime Down Solar Park Limited as the Applicant and (2) Wiltshire Bridleways Association (WBA).
- 1.2.2 Collectively, Lime Down Solar Park Limited and WBA are referred to as 'the parties'.

### **1.3 Terminology**

- 1.3.1 In the tables in Section 3 of this SoCG:
- "Agreed" indicates where the issue has been resolved.
  - "Not Agreed" indicates a final position, and
  - "Under discussion" indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

## 2 Record of Engagement

### 2.1 Summary of Engagement

2.1.1 The parties have been engaged in consultation since 9 January 2026. A summary of the meetings and correspondence that has taken place between the Applicant and Wiltshire Bridleways Association is outlined in Table 2-1.

**Table 2-1 Summary of engagement**

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
9 January 2026	Relevant representation	The Wiltshire Bridleways Association submitted a relevant representation to the Planning Inspectorate.
6 March 2026	Phone call and email	Introductory phone call and follow up email to discuss the approach to the preparation of the Statement of Common Ground.
17 April 2026	Email	Email from Wiltshire Bridleway Association to confirm the main contact for the SoCG
20 April 2026	Phone call	Phone call to discuss proposed deadline for SoCG
22 April 2026	Email	Follow up email from Wiltshire Bridleway Association to confirm alternative date for the comments on the SoCG
02 May 2026	Email	Email from Wiltshire Bridleway Association to request a meeting to discuss the SoCG
22 May 2026	Email	Email from Wiltshire Bridleway Association to provide comments on the initial draft SoCG.

### 3 Matters Raised

3.1.1 This section sets out a table for each relevant sub-topic, identifying where matters are agreed, still under discussion, or not agreed.

#### 3.1 Socio-Economic Tourism Recreation

**Table 3-1 Socio-Economic Tourism Recreation**

Reference	Sub-topic	WBA Position	Applicant's Position	Status
3.1.1	Legislation and Policy	No Comment	The Applicant considers that <b>ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]</b> and its supporting <b>ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240]</b> has identified and appropriately considered all applicable legislation and policy.	Agreed
3.1.2	Methodology	No Comment	The methodology adopted within <b>ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]</b> has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable.	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
3.1.3	Baseline	No Comment	The baseline conditions which are detailed in <b>ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]</b> and its supporting <b>ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240]</b> are representative of the baseline site conditions.	Agreed
3.1.4	Assessment results - impact on Bridleways within and bordering the application area during construction and operation	<p>WBA is concerned that bridleways SHER14, SHER16, MALW54, MALW59, MALW61, SSTQ4, GSOM9, which becomes SEAG23, would become unusable as a Public Right of Way for the use of equestrians, cyclists and walkers during and after construction if the Lime Down Solar Park were approved.</p> <p>Horse Riders, along with walkers and cyclists, are classed as vulnerable road users and consequently any development that threatens safe off-road riding routes, and which may force riders on to public roads is of major concern.</p>	The Applicant considers that <b>ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]</b> and its supporting <b>ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240]</b> have sufficiently assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on all public rights of way, unsurfaced highways, the local highway network, and any permissive routes made known to the Applicant. Equestrian facilities including both	Under Discussion

Reference	Sub-topic	WBA Position	Applicant's Position	Status
		Riders are likely to avoid narrow, enclosed corridors through solar farms, losing enjoyment of off-road routes and open countryside views.	private facilities and business have also been individually assessed. Residual significant adverse effects are only assessed as likely to occur during construction, to bridleway MALW54, the unsurfaced roads in Rodbourne used to access Lime Down E, and the equestrian facilities at Park Farm, Yatton Keynell.  Mitigation measures to protect all PROW users are set out in the <b>Outline Construction Traffic Management Plan (CTMP) [REP1-112]</b> and <b>Outline Public Rights of Way and Permissive Paths Management Plan (PRoWPPMP) [REP1-104]</b> , secured respectively by Requirements 15 and 16 in Schedule 2 to the <b>Draft DCO [REP1-007]</b> .	
3.1.5	Assessment results - impact on PROWs outside of the application area during construction and operation	WBA are concerned nearby PROWs may also be affected, extending the impact well beyond the 2,000-acre solar park.	The assessment in <b>ES Volume 1, Chapter 16 Socio-Economics, Tourism and Recreation [APP-068]</b> and the supporting <b>ES Volume 3, Appendix 16 2: Tourism and Recreation Receptor Tables [APP-241]</b> have assessed the likely impacts of the Scheme on a 2 km Zone of Influence surrounding the Scheme,	<b>Under Discussion</b>

Reference	Sub-topic	WBA Position	Applicant's Position	Status
			which extends to a 5 km Zone of Influence for regionally or nationally important tourism and recreation receptors.	
3.1.6	Mitigation - Construction Traffic	<p>Without the below mitigation measures WBA objects to all parts of the development.</p> <ul style="list-style-type: none"> <li>• Prepare a traffic effect plan considering safety of PROW users.</li> <li>• Restrict traffic to normal working hours; avoid early mornings, evenings, weekends.</li> <li>• Avoid bridleways, byways, and unsurfaced roads for site access; if unavoidable, maintain surfaces suitable for horses.</li> <li>• Provide alternative routes for equestrians during construction.</li> </ul>	<p>Mitigation measures to protect all PROW users, and recreational users of the public highway network are set out in the <b>Outline CTMP [REP1-112]</b> and <b>Outline PROWPPMP [REP1-104]</b>, secured respectively by Requirements 15 and 16 in Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p>	<b>Under discussion</b>
3.1.7	Mitigation - Closure of Rights of Way	<p>Without the below mitigation measures WBA objects to all parts of the development.</p> <ul style="list-style-type: none"> <li>• Avoid full closures without alternatives.</li> </ul>	<p>Mitigation measures to protect all PROW users, and recreational users of the public highway network are set out in the <b>Outline CTMP [REP1-112]</b> and <b>Outline PROWPPMP [REP1-104]</b>, secured respectively by Requirements</p>	<b>Agree</b>

Reference	Sub-topic	WBA Position	Applicant's Position	Status
		<ul style="list-style-type: none"> <li>Minimise closure duration if necessary; manage construction traffic carefully.</li> </ul> <p>We understand that only one existing bridleway will be closed for the construction phase (MALW54) and accept this measure.</p>	<p>15 and 16 in Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p> <p>Closures of PRoW are to be avoided where possible. Diversions lasting the full construction period are proposed only for bridleway MALW54, footpath MALW55, and footpath GRIT20.</p>	
3.1.8	Mitigation - Surface and Cable Management	<p>Without the below mitigation measures WBA objects to all parts of the development.</p> <ul style="list-style-type: none"> <li>Trenches should not cross rights of way; if necessary, obtain Highway Authority authorization.</li> <li>Reinstatement of surfaces must be firm and safe for horse use within a short timeframe.</li> <li>Buried cables near equestrian routes should be deeper than 300mm to avoid electrical hazards.</li> </ul> <p>WBA have reviewed the Applicant's position and confirm they agree on the proviso that human and equine safety remain paramount.</p>	<p>Mitigation measures to protect all PROW users, and recreational users of the public highway network are set out in the <b>Outline CTMP [REP1-112]</b> and <b>Outline PROWPPMP [REP1-104]</b>, secured respectively by Requirements 15 and 16 in Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p> <p>Cable trenches are proposed to cross PROWs, with the exception of locations where the Applicant has specifically committed to a trenchless technique (usually associated with major roads or watercourse crossings). Detail design of cable trenching will be submitted to Wiltshire Council (including in their role as highway authority) for approval. Cable trench sizes and depth are set out in the <b>Design Principles and Parameters [REP1A-008]</b>, secured by</p>	<b>Agree</b>

Reference	Sub-topic	WBA Position	Applicant's Position	Status
			Requirement 5 in Schedule 2 to the <b>Draft DCO [REP1-007]</b> .	
3.1.9	Mitigation - Noise Mitigation	<p>Without the below mitigation measures WBA objects to all parts of the development.</p> <ul style="list-style-type: none"> <li>• Use noise-attenuating fencing along bridleways for construction.</li> <li>• Inverter units should be sited away from public access and sound-proofed.</li> </ul> <p>WBA remains concerned regarding the hum from the panels which will potentially affect the usability of SHER 16 once the array is built. A substation is planned to be on HULL7. WBA questions what noise levels will be emitted from the substation.</p>	<p>Noise and vibration impacts arising from construction activities are assessed in Section 14.10 of <b>ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]</b>. Relevant mitigation measures are set out in the <b>Outline Construction Environmental Management Plan (CEMP) [REP1-096]</b>, secured by Requirement 13 in Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p> <p>The <b>Outline Operational Environmental Management Plan (OEMP) [REP1-098]</b> commits to noise levels from the Scheme being the same as or below those presented in Section 14.10 of <b>ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]</b> and <b>ES Volume 3, Appendix 14-4: Noise Modelling [REP1-061]</b>. This is secured by Requirement 14 in Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p>	<b>Under Discussion</b>
3.1.10	Mitigation - Drainage	Without the below mitigation measures WBA objects to all parts of the development.	The assessment in <b>ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]</b>	<b>Under Discussion</b>

Reference	Sub-topic	WBA Position	Applicant's Position	Status
		<ul style="list-style-type: none"> <li>Assess and provide adequate drainage for altered surfaces to prevent flooding.</li> <li>Consider effects beyond site boundaries; avoid hard surfacing unless necessary.</li> <li>Preserve existing surfaces where possible; upgrade only if suitable for horses.</li> </ul> <p>BA remains concerned as to the effect of the construction traffic on the surface quality of the byways in the area and the effect of the change in land use will have on the same.</p>	<p>demonstrates that existing drainage patterns would be maintained and that the Scheme would result in significantly changed runoff or inadequate drainage that could affect equestrian routes.</p> <p>Relevant mitigation measures are set out in the <b>Outline CEMP [REP1-096]</b>, secured by Requirement 13 in Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p> <p>The Applicant furthermore has committed to ensuring any construction alterations or damage to PROWs are remediated following construction works being completed. The Applicant also commits to maintaining the surface condition of PROWs on the Scheme throughout the operational lifetime of the Scheme. This is secured through the <b>Outline PRoWPPMP [REP1-104]</b>, by Requirement 16 in Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p>	
3.1.11	Mitigation - Fencing	Without the below mitigation measures WBA objects to all parts of the development.	A minimum surface width of 3 m is proposed for bridleways, as recommended by guidance from the British Horse Society. However, only groundcover planting will be planted	<b>Under Discussion</b>

Reference	Sub-topic	WBA Position	Applicant's Position	Status
		<ul style="list-style-type: none"> <li>• Maintain minimum width of 4–5m along bridleways/byways.</li> <li>• Use open mesh fencing; avoid intimidating or hazardous fencing (e.g., metal palisades with spikes).</li> <li>• Ensure vegetation and hedges do not narrow usable paths.</li> </ul> <p>It will be very important that the width of the corridors (especially on SHER 16 and the proposed permitted paths through the arrays) are wide enough so horses do not feel trapped or threatened. We note that a minimum of 3 meters is proposed.</p>	<p>immediately alongside PROWs, allowing users to pass at a greater width if required. Where new hedgerow planting is proposed alongside PROWs, this will be planted to maintain a suitable passable width that is to be determined at the detailed design stage. This is shown indicatively on <b>ES Volume 2, Figures 3-4-1 to 3-4 5.2: Landscape and Ecology Mitigation Plan [REP-029 to REP1-032]</b>.</p> <p>The majority of site fencing is to consist of 2 m deer stock fencing set a minimum of 15 m from the centreline of the nearest PROW. Metal palisade fencing is only proposed in locations where there is a danger to life, and so is limited to substation and BESS enclosures. Palisade fencing is not proposed adjacent to PROWs.</p> <p>These principles (including offsets to PROWs, PROW widths, and fencing and PV types), are set out in the <b>Design Principles and Parameters [REP1A-008]</b> and indicatively shown on the <b>ES Volume 2, Figures 3-4-1 to 3-4 5.2: Landscape and Ecology</b></p>	

Reference	Sub-topic	WBA Position	Applicant's Position	Status
			<p><b>Mitigation Plan [REP-029 to REP1-032]</b></p> <p>All details of the Scheme are subject to the relevant Requirements in Schedule 2 the <b>Draft DCO [REP1-007]</b>.</p>	
3.1.12	Mitigation - Security	<p>Without the below mitigation measures WBA objects to all parts of the development.</p> <ul style="list-style-type: none"> <li>• Anti-vehicle barriers allowed only for livestock or user safety, not for theft prevention.</li> <li>• Permissive paths should follow BHS guidance on vehicle barriers.</li> </ul>	<p>PROWs are not proposed to be located within 'secure' areas and so are only to be controlled where there is potential for livestock to be present on adjacent land. This is demonstrated on the <b>ES Volume 2, Figures 3-4-1 to 3-4 5.2: Landscape and Ecology Mitigation Plan [REP-029 to REP1-032]</b> and secured in principle by the <b>Design Principles and Parameters [REP1A-008]</b>. Both of these documents are subject to detailed design being approved as secured through Requirements 5 and 7 of Schedule 2 to the <b>Draft DCO [REP1-007]</b></p> <p>Treatment of specific gaps, and barriers on PRoW are under discussion with Wiltshire Council and are to be discussed and agreed through a SoCG.</p>	<b>Agree</b>
3.1.13	Mitigation - Alternative or	Without the below mitigation measures WBA objects to all parts of the development.	The Applicant has committed to providing permissive paths as part of the Scheme on the Solar PV Sites.	<b>Under Discussion</b>

Reference	Sub-topic	WBA Position	Applicant's Position	Status
	Additional Access	<ul style="list-style-type: none"> <li>• Provide new or upgraded routes to enhance community access and circular routes.</li> <li>• Consider upgrading footpaths to bridleways.</li> <li>• Ensure new routes link effectively with existing PROWs.</li> </ul> <p>Proposed permitted paths around Limedown A linking Sher 14 to SHER16 will improve the riding path network in this area.</p> <p>Path linking MALW59 and MALW62 needs to be extended to SSTQ4 to benefit the equestrian community.</p> <p>Proposed permitted path through Lime Down B does not reach Honey lane but would be a bonus to equestrians riding off road if it did.</p> <p>The proposed permitted path linking the fosseway to SHER35 and the path linking LUCK57 with the road with also improve the network</p>	<p>These include paths for pedestrians where linking public footpaths, and for equestrians and cyclists where linking bridleways. These are designated as Work No. 10 on the <b>Works Plan [REP1-005]</b> and shown as on <b>ES Volume 2, Figures 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plan [REP-029 to REP1-032]</b>, with the various measures for developing these secured through the <b>Outline Landscape and Ecological Management Plan (LEMP) [APP-283]</b>, and the <b>Outline PROWPPMP [REP1-104]</b>, under Requirement 7 and 16 of Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p> <p>The Applicant confirms (in response to these specific comments raised) this includes: permissive bridle routes in Lime Down A between SHER14/Foxley-Sherston Road and two points on SHER16, both a permissive path and permissive bridle route in Lime Down E connecting MALW59 to MALW61, and to MALW63 (SSTQ4) respectively, and permissive bridle routes connecting SHER35 to the</p>	

Reference	Sub-topic	WBA Position	Applicant's Position	Status
			<p>Fosse Way and connecting LUCK57 at Cream Gorse to the public highway near Alderton Church through Lime Down C.</p> <p>The Applicant currently can only commit to a permissive path for pedestrians on Lime Down B due to the route intersecting a public footpath (NORT10)</p> <p>The Applicant has worked with Wiltshire Council's PRow and Countryside Access Team to generate permissive path links and explore means by which PRow infrastructure within the Order Limits can be repaired or improved. The latter are likely to be agreed at detailed design following development consent. The Applicant is also committed to providing a Community Benefit Fund for offsite works.</p>	
3.1.14	Mitigation - Visual Screening	Without the below mitigation measures WBA objects to all parts of the development.	The assessment in <b>ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]</b> has been undertaken in accordance with the methodology set out in GLVIA3, which sets out an assumed observer	<b>Under Discussion</b>

Reference	Sub-topic	WBA Position	Applicant's Position	Status
		<ul style="list-style-type: none"> <li>Account for equestrian height (approx. 11 ft) when assessing visual impact.</li> <li>Plant larger or semi-mature trees for effective screening.</li> </ul> <p>WBA is still concerned that the change in land use will be to the detriment of walkers, cyclists equestrians and tourists experience of the area so the quality of the visual screening will be of paramount importance.</p>	<p>height of 1.5-1.7 m based on the average height of a person. Whilst it is recognised mounted equestrians will be higher, this does not represent the majority of PROW users.</p> <p>The assessment in <b>ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060]</b> assesses Year 1 and Year 15 impacts. Planting of larger or semi-mature trees and hedges are proposed only where instant screening is deemed necessary.</p>	
3.1.15	Policy / Mitigation - Planning Compliance	<p>Without the below mitigation measures WBA objects to all parts of the development.</p> <ul style="list-style-type: none"> <li>Align mitigation with NPPF, Wiltshire Core Strategy Policy 52, and DEFRA ROW Circular 1/09.</li> <li>Retain, enhance, and manage green infrastructure.</li> <li>Avoid diversions unless the new route is more advantageous; consider reversion post-permission.</li> </ul>	<p>The Applicant considers that <b>ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]</b> and its supporting <b>ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240]</b> has identified and appropriately considered all applicable legislation and policy.</p>	<b>Under Discussion</b>

Reference	Sub-topic	WBA Position	Applicant's Position	Status
3.1.16	Mitigation - Specific Proposed Bridleway Upgrades	<p>Without the below mitigation measures WBA objects to all parts of the development.</p> <ul style="list-style-type: none"> <li>Lime Down A–E: Provide new or upgraded bridleways along perimeters and connecting existing PROWs to maintain safe, circular, and continuous routes.</li> </ul>	<p>The Applicant has committed to providing permissive paths as part of the Scheme on the Solar PV Sites. These include paths for pedestrians where linking public footpaths, and for equestrians and cyclists where linking bridleways. These are designated as Work No. 10 on the <b>Works Plan [REP1-005]</b> and shown as on <b>ES Volume 2, Figures 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plan [REP-029 to REP1-032]</b>, with the various measures for developing these secured through the <b>Outline LEMP [APP-283]</b>, and the <b>Outline PRoWPPMP [REP-104]</b> under Requirements 7 and 16 of Schedule 2 to the <b>Draft DCO [REP1-007]</b>.</p> <p>Some of the routes requested by WBA have been considered but ultimately not included due to location specific constraints or matters of land ownership that cannot be addressed through the Development Consent Order.</p>	<p><b>Under Discussion</b></p>