



Lime Down

Solar Park

Statement of Common Ground with National Highways

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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 National Highways.

Signed on behalf of Lime Down Solar Park Limited

Name:

Position:

Date:

Signature:

Signed by National Highways

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) National Highways.
- 1.2.2 Collectively, Lime Down Solar Park Limited and National Highways 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 29 January 2025. A summary of the meetings and correspondence that has taken place between the Applicant and National Highways is outlined in Table 2-1.

Table 2-1: Summary of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
29 January 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to National Highways for the launch of the statutory consultation.
20 February 2025	Scoping Opinion Response	Scoping response covered baseline conditions, construction programme and vehicle trip generation, traffic impact, construction vehicle access and routing, abnormal loads and outline CTMP and directional drilling for cable route corridor. NH considered that the development is unlikely to have any other significant adverse impacts on the SRN.
3 June 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to National Highways for the launch of the targeted consultation.
17 June 2025	Online MS Teams Meeting between Applicant, Project Team and National Highways	Meeting to discuss study area and baseline conditions, construction programme and vehicle trip generation, construction vehicle access and routing, abnormal loads and outline CTMP and directional drilling for cable route corridor. NH considered that the development is unlikely to have any other significant adverse impacts on the SRN.
29 October 2025	Email / letter	Notice under Section 56 of the Planning Act 2008 issued by the Applicant to National Highways.
9 January 2026	Relevant Representation	NH submitted a relevant representation to the Planning Inspectorate.
18 March 2026	Online MS Teams Meeting between	Meeting to discuss National Highways Relevant Representation. The Applicant and National Highways discussed outstanding

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Applicant, Project Team and National Highways	issues and concluded that it most issues could be resolved subject to agreement of the protected provisions and agreement on amendments required by NH to the DCO.
13 April 2026	Email	The Applicant provided NH with the draft SoCG document for their review and comment
23 April 2026	Email	NH provided the Applicant with comments on the draft SoCG document
1 May 2026	Written Representation	NH submitted a written representation to the Planning Inspectorate

3 Matters Raised

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

3.2 Draft Development Consent Order

Table 3-1: Draft Development Consent Order

Reference	Sub-topic	National Highways Position	Applicants Position	Status
3.1.1	Protective provisions	In order to facilitate the withdrawal of National Highways' objection to the DCO and the Authorised Development, National Highways requests that the Applicant includes the National Highways protective provisions at Appendix 1 to the draft Order [REP1-007] at the next deadline. National Highways will continue to engage with the Applicant to seek agreement on the protective provisions and will update the Examining Authority at a subsequent deadline.	Further to ongoing engagement with National Highways, the form of protective provisions has been agreed. The agreed form of protective provisions is included in the updated Draft DCO [REP1-007] submitted at Deadline 1.	Under Discussion
3.1.2	Draft DCO Articles	National Highways object to the powers provided to the Applicant under the Articles, which apply to land that includes the M4, which forms part of the	The Applicant has agreed the form of Protective Provisions with National Highways, which include restrictions on the use of DCO powers in relation to NH's land and the SRN. The agreed form of protective provisions are	Under Discussion

Reference	Sub-topic	National Highways Position	Applicants Position	Status
		<p>strategic network that National Highways is responsible for.</p> <p>National Highways' request the Applicant to obtain it's consent for any works affecting the strategic road network or land in which National Highways has an interest.</p> <p>National Highways' objection would be resolved by inclusion of its proposed protective provision requiring consent before powers are exercised.</p> <p>Any such consent must not be subject to deemed consent under article 47.</p>	<p>included in the updated Draft DCO [REP1-007] submitted at Deadline 1.</p>	
3.1.3	Article 21 (Compulsory acquisition of land)	<p>The DCO seeks powers to acquire or interfere with 23 plots owned or used by National Highways. These plots are essential for maintaining the Strategic Road Network (SRN). National Highways objects to the DCO and compulsory powers over these plots without protective provisions, arguing that granting such powers without safeguards would harm the SRN and lacks sufficient public interest justification.</p>	<p>There are no proposals to permanently acquire the freehold interest of NH land.</p>	Under Discussion

Reference	Sub-topic	National Highways Position	Applicants Position	Status
3.1.4	Temporary possession and acquisition of rights in respect of NH land interests	<p>The Applicant is seeking the power to take temporary possession of the land referred to in schedule 11 and any other order land without the consent of National Highways. National Highways are concerned that while Schedule 11 does not include any land which they have an operational interest in, it is noted that the article also applies to other Order land.</p> <p>The DCO seeks powers to acquire or interfere with 23 plots owned or used by National Highways. These plots are essential for maintaining the Strategic Road Network (SRN). National Highways objects to the DCO and compulsory powers over these plots without protective provisions, arguing that granting such powers without safeguards would harm the SRN and lacks sufficient public interest justification.</p> <p>National Highways must have control over the operations being carried out on its network and the Applicant should be required to obtain National Highways' consent in the event the activities effect</p>	<p>The Applicant has agreed the form of Protective Provisions with National Highways, which include restrictions on the use of DCO powers in relation to NH's land and the SRN. The agreed form of protective provisions are included in the updated Draft DCO [REP1-007] submitted at Deadline 1.</p>	Under Discussion

Reference	Sub-topic	National Highways Position	Applicants Position	Status
		the strategic road network or any land National Highways has an interest in.		
3.1.5	Article 40 (Felling or lopping of trees and removal of hedgerows)	<p>National Highways are concerned that this article provides the Applicant with the power to fell or lop any tree or shrub near any part of the authorised development.</p> <p>National Highways have environment mitigation commitments that may be affected by the authorised development and may put National Highways in breach of its own statutory obligations. It notes that Hedge CH170 (hedgerow) and CRH173 (important hedgerow) are located on the boundary of the network, and CRH172 (important hedgerow) is close to the boundary.</p> <p>Further clarity from the Applicant is needed on the works within Works No 5A that may impact CRH170, CRH173 and CHR172 so that National Highways can assess the impact of these hedgerows cumulatively.</p> <p>NH notes the Applicant's response to NH's Written Representations which relate to this Article. NH is unable to</p>	<p>Work No. 5A consists of laying the grid connection cable for the Scheme. This will be laid using trenchless techniques below the strategic road network. The agreed form of protective provisions provides NH with plan approval rights, ensuring it will not be put in breach of its statutory obligations. The agreed form of protective provisions is included in the updated Draft DCO [REP1-007] submitted at Deadline 1.</p> <p>In regard to the comment about Written Representations, the Applicant assumes this should be a reference Relevant Representations provided at Deadline 1 as responses to the former will be provided at Deadline 2.</p> <p>The response provided in the Applicant's Response to Relevant Representations (Part 1) [PDA-009] states that CRH170 and CRH173 lie within an 'Avoidance Area'. The proposed construction methodology in the Avoidance Areas is presented in</p>	Under Discussion

Reference	Sub-topic	National Highways Position	Applicants Position	Status
		<p>locate the information referred to (ES Volume 2 Appendix 3-2 Cable Installation Method [APP-183] and the Ecological Protection and Mitigation Strategy [APP-284]) and therefore is unable to comment further at the moment.</p> <p>Please also see NH's comments in relation to Requirement 7 and 8.</p>	<p>Section 1.3 of ES Volume 2, Appendix 3-2: Cable Installation Method Statement [APP-183].</p> <p>The Applicant's Response to Relevant Representations (Part 1) [PDA-009] stated that up to a 12 m wide section of CRH172 may be removed temporarily for cable route installation works, to enable construction of a cable trench and temporary haul route. On completion of temporary construction, works the section of hedgerow removed will be reinstated or replanted. The method statement for temporary habitat removal and reinstatement is provided in Section 6.3 in the Outline Ecological Protection and Mitigation Strategy (EPMS) [REP1-106].</p>	
3.1.6	Article 41 (Trees subject to tree preservation order)	<p>National Highways believes that the reference to Part 4 of Schedule 12 is an error since there is only Parts 1-3 of Part 12.</p> <p>Part 3 sets out trees subject to TPO's and notes that these relate to Work Nos5A and 8A for TPO Tree N/TPO8 and N/TPO42 (both shown on sheet 9 of 23 of the TPO and Hedgerow Plan).</p>	<p>The referencing error has been corrected in the updated Draft DCO [REP1-007] submitted at Deadline 1.</p> <p>The agreed form of protective provisions included in the updated Draft DCO [REP1-007] at Deadline 1 provide appropriate protection for National Highways' from the exercise of the powers contained in the DCO.</p>	Under Discussion

Reference	Sub-topic	National Highways Position	Applicants Position	Status
		<p>National Highways have no comment on TPO8 on the basis that is located a distance away from its network. However, TPO42 is in close proximity to National Highways' network and therefore our comments above in relation to culminative impact apply equally here.</p> <p>It is noted that TPO7 is not referred to in Schedule 12 but is adjacent to the SRN and forms the boundary to the same. The Applicant is requested to review Schedule 12 in light of the TPO and Hedgerow Plan (sheet 9 of 23).</p> <p>National Highways have environment mitigation commitments that may be affected by the authorised development and may put National Highways in breach of its own statutory obligations.</p> <p>National Highways object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of National Highways' proposed protective provisions. This would address National Highways objection to this article, which requires the Applicant to obtain National</p>		

Reference	Sub-topic	National Highways Position	Applicants Position	Status
		<p>Highways consent before exercising their right under this article.</p> <p>NH notes the comments on the reference error and will confirm agreement once NH has considered the updated Draft Development Consent Order submitted at Deadline 1.</p>		
3.1.7	Requirements	<p>Regarding multiple parcels of land, the Applicant is required to obtain a National Highway's consent in the event the activities effect the SRN or any land NH has an interest in.</p> <p>In addition to the Requirements noted above:</p> <ol style="list-style-type: none"> 1) A definition of relevant highway authority is required 2) NH also requires to be consulted on the discharge of Requirement 3 (approved documents and plans), 7 (written landscape and ecological management plan), 8 (written ecological protection and mitigation strategy), 10 (means of enclosure), 11 (surface water drainage scheme), 13 (construction environmental management plan), 14 	<p>(1) The Applicant will add a definition of 'relevant highway authority' to next version of the draft DCO to be submitted into Examination (Deadline 3).</p> <p>(2) National Highways, as 'relevant highway authority' will be consulted on the discharge of:</p> <ul style="list-style-type: none"> • Requirement 15 (construction traffic management plan (CTMP)) • Requirement 16 (public rights of way and permissive paths) • Requirement 20 (decommissioning and restoration). <p>NH must also be consulted in respect of measures in the detailed Construction Environmental Management Plan (CEMP) where these are located in the vicinity of the SRN, to ensure no adverse effects are caused to the SRN.</p>	Under Discussion

Reference	Sub-topic	National Highways Position	Applicants Position	Status
		<p>(operational environmental management plan) as set out in its Relevant Representations [RR-3426] in relation to matters relating to NH's statutory function. Amendments are also required to Requirement 5 as set out in NH's Relevant Representations [RR-3426].</p>	<p>This requirement is included in the Outline CEMP [REP1-096] submitted at Deadline 1, and provides proportionate consultation on matters including fencing, drainage and dust suppression close to the SRN. The Applicant will add a similar provisions to the next version of the Outline Operational Environmental Management Plan (OEMP) [REP1-098] in respect of replacement activities.</p> <p>The Applicant therefore considers that it is not necessary for National Highways to be a named consultee in respect of Requirements 7, 8, 10, 11, 13 or 14.</p> <p>The Applicant has included updated wording at Schedule 16 (Procedure for the discharge of requirements) to the Draft DCO [REP1-007] submitted at Deadline 1 which requires that, in respect of an application to amend an approved document under Requirement 3, any named consultees must also be consulted in relation to the approval of that amended document. This followed discussions between the Applicant and National Highways. As such, National Highways will be consulted on any</p>	

Reference	Sub-topic	National Highways Position	Applicants Position	Status
			amendments to the final CTMP, public rights of way and permissive paths management plan and decommissioning strategy (pursuant to Requirements 15, 16 and 20 respectively).	
3.1.8	Draft Development Consent Order – Schedule 1	Insufficient Information on Proposed Works: Details for works 5A and 8A affecting the SRN (Schedule 1 of the draft order) are unclear. Without full information, National Highways cannot assess or manage potential impacts. Protective provisions are needed to ensure relevant information is provided. NH note the Applicant's response to NH's Relevant Representations in this regard. Discussions with the relevant technical teams within NH in respect of the detail of the geotechnical specification for the directional drilling is currently ongoing.	The Applicant has agreed the form of Protective Provisions with National Highways, which include plan approval rights prior to any use of DCO powers or the carrying out of any works in relation to NH's land and the SRN. The agreed form of Protective Provisions is included in the Draft DCO [REP1-007] provided at Deadline 1. This mechanism will ensure the relevant information is provided to NH.	Under Discussion
3.1.9	Schedule 16	NH request the amendment Schedule 16 as agreed in Green Hill Draft Development Consent Order.	The Applicant confirms that Schedule 16 (Procedure for the discharge of requirements) to the Draft DCO [REP1-007] submitted at Deadline 1 was amended to align with the wording agreed between National Highways and Green Hill Solar Farm Limited. This	Agreed

Reference	Sub-topic	National Highways Position	Applicants Position	Status
			<p>amendment requires that, in respect of an application to amend an approved document under Requirement 3, any named consultees must also be consulted in relation to the approval of that document. As such, National Highways will be consulted on any amendments to the final CTMP, public rights of way and permissive paths management plan and decommissioning strategy (pursuant to Requirements 15, 16 and 20 respectively).</p>	

3.3 Transport and Access

Table 3-2 Transport and Access

Reference	Sub-topic	National Highways Position	Applicants Position	Status
3.2.1	Legislation and Policy	National Highways provided no comments on the legislation and policy used for the Transport and Access assessment.	The Applicant considers that ES Volume 1, Chapter 13: Transport and Access [REP1-019] has identified and appropriately considered all applicable transport legislation and policy.	Agreed
3.2.2	Methodology	National Highways provided no comments on methodology adopted for the Transport and Access assessment.	The Applicant considers that the methodology adopted within ES Volume 1, Chapter 13: Transport and Access [REP1-019] has identified and appropriately considered all applicable transport legislation and policy.	Agreed
3.2.3	Baseline	National Highways provided no comments on baseline conditions in the Transport and Access assessment.	The baseline conditions which are detailed in ES Volume 1, Chapter 13: Transport and Access [REP1-019] of the ES are representative of the baseline site conditions.	Agreed
3.2.4	Traffic Impact – Construction Phase	On the basis that the traffic impact represents a low percentage increase in M4 vehicle flows, the Applicant is not proposing to undertake any further assessment of traffic impacts for the SRN. It should be noted that National Highways would not usually accept	The Applicant welcomes National Highways' confirmation that no further capacity assessment is required for the SRN. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An Outline CTMP	Agreed - subject to agreement on Requirement 15

Reference	Sub-topic	National Highways Position	Applicants Position	Status
		<p>percentage-flow changes as a measure of traffic impacts on the SRN, but it is recognised that the impact will be temporary for the construction period only and is considered unlikely to result in an unacceptable or severe impact on the M4 and junctions 17 and 18 in accordance with the NPPF and DfT Circular 01/2022. No further capacity assessment in respect of the SRN is therefore sought. The Applicant has submitted an outline construction traffic management plan and it will be necessary for National Highways to review a final plan as noted above under Requirement 15 in respect of M4 measures.</p> <p>At deadline 1, NH requests to be consulted upon the outline CTMP and the final CTMP. Please see Requirement 15.</p>	<p>[APP-277] has been prepared and submitted with the Application. The CTMP sets out measures to ensure that the effect of construction traffic on the local highway network is minimised, including defined construction access points, approved HGV routes, coordination of deliveries, and timing restrictions to avoid peak traffic periods where practicable.</p> <p>The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the Draft DCO [REP1-007], ensuring construction traffic effects on the M4 are appropriately managed throughout the construction phase. National Highways is a named consultee (as the relevant highway authority) for the purposes of Requirement 15.</p>	
3.2.5	Traffic Impact – Operational Phase	National Highways confirm that once operational, the scheme will generate minimal traffic which is not expected to result in any material impact on the SRN.	The Applicant welcomes National Highways' confirmation that no further capacity assessment is required for the SRN.	Agreed

Reference	Sub-topic	National Highways Position	Applicants Position	Status
3.2.6	Traffic Impact – Decommissioning Phase	National Highways confirm that vehicle movements associated with the decommissioning phase are not expected to exceed those generated during the construction period.	The Applicant welcomes National Highways' confirmation that no further capacity assessment is required for the SRN.	Agreed