



**Cotswolds
National
Landscape**

15 June 2026

Dear Sir/Madam,

PINS REFERENCE NO: EN010168

DESCRIPTION: Development consent to construct, operate, maintain and decommission a solar photovoltaic (PV) generating station, with a generating capacity of more than 50 megawatts (MW) and associated infrastructure

LOCATION: Lime Down Solar Park, Wiltshire

This response comprises the Cotswolds National Landscape Board's ('the Board's') Written Representations for submission at Examination Deadline 3- 15 June 2026 in response to the Examining Authority's First Written Questions.

The Board's responses to the Examining Authority's First Written Questions and requests for information

The Examining Authority issued its First Written Questions and requests for information (ExQ1) on Friday 29 May 2026, four of which were directed to the Board along with other parties. These four comprised:

ExQ1 LV1.9: *The parties are asked to define in spatial terms the extent of the area outside of the boundary of the Cotswolds National Landscape (CNL) that is considered to form the setting of the CNL.*

CNLB Response:

In the Applicant's Response to Relevant Representations (PDA-009) to the comments of the Board at CNL-054 (page 582), the Applicant states "*The Applicant agrees that Lime Down A, B and C and parts of the Cable Route Search Corridor are located within the setting of the Cotswolds National Landscape and that sites D and E are not*". This is also confirmed in respect of Sites A, B and C at paragraph 3.6.3 of ES Appendix 8-6. The Board agrees with this statement.

The Board's Development in the Setting of the Cotswolds AONB Position Statement states "*The Board considers the setting of the Cotswolds AONB to be the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the Cotswolds AONB*". The Position Statement clarifies this further stating: "*The surroundings of the Cotswolds AONB are also important to its landscape character and quality. There are views out of the AONB and across back into land within the AONB and views towards or into it from surrounding areas, all of which can be very significant. Development proposals that affect views into and out of the AONB need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the AONB*".

ExQ1 LV1.11 1): *With regards to PMIE 3, the applicant and the CNLB are asked to clarify how its recommendation that consideration should also be given to removing the southern part of Field A1 was dealt with and whether the CNLB still consider that panels should be removed in this location?*

CNLB Response: The Board notes the draft Statement of Common Ground with the Cotswolds National Landscape Board (May 2026, Revision 1, REP2-029) and the Applicant's position on this matter which is stated at Reference 3.1.17, page 14 of the document: "*The final iteration of the Scheme includes the avoidance of panels in the southern part of Field A1, the remainder of Field C6 and Fields C7. These areas*

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The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

cotswoldsaonb.org.uk

Chairman:
Brendan McCarthy

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Rebecca Charley

are identified for habitat enhancement" (our emphasis). As such the Board understands and supports the Applicant's position that Solar PV panels are to be removed from the southern part of Field A1.

ExQ1 LV1.12: *In its RR, the CNLB states [RR-0944] that it considers it likely that construction traffic would have a significant adverse impact upon the tranquillity of the National Landscape (one of its special qualities). Other than disagreeing with the applicant's assessment of the impact on the special quality of tranquillity, do the CNLB agree with the applicant's conclusions on the assessment of effects on the CNL's other special qualities as summarised in table 18 of the applicant's ES Appendix 8-6 [APP-197]?*

CNLB Response: The Board notes the Applicant's assessment of the impact of the Scheme on the 14 identified special qualities of the CNL, as summarised in Table 18 of Appendix 8-6 of the ES (APP-197). The Applicant also summarises the effects of the Scheme on the CNL's special qualities in Table 2-1 of their Tranquillity Technical Note (PDA-010).

In both documents the Applicant concludes that there would be no direct significant effects on the special qualities of the CNL. The Board disagrees with this assessment for the reasons outlined in our previous representations and expanded upon below.

Please see below the Board's comments on each of the CNL's 14 special qualities listed at Section 4 of the Cotswolds National Landscape Management Plan 2025-2030:

We agree that the following special qualities should be scoped out of any assessment:

2. *The Cotswold escarpment, including views from and to the National Landscape;*
7. *Ancient broadleaved woodland particularly along the crest of the escarpment; and*
8. *Variations in the colour of the stone from one part of the National Landscape to another which add a vital element of local distinctiveness.*

We consider that in addition to the above, the following special quality should also be scoped out due to the distance of the Scheme from the High Wold LCT:

3. *The high wolds – a large open, elevated predominately farmed landscape with commons, 'big' skies and long-distance views.*

We also agree that the following special qualities would be unaffected by the Scheme:

1. *The unifying character of the limestone geology – its visible presence in the landscape and use as a building material;*
4. *River valleys, the majority forming the headwaters of the Thames; and an important water resource; and*
14. *A vibrant heritage of cultural associations.*

Therefore, we make the following comments regarding the remaining special qualities:

5. *Distinctive dry-stone walls:* Although dry-stone walls are not a characteristic feature of this immediate part of the CNL, the Board understands that the Scheme would include the restoration of some short stretches of dry-stone wall within the CNL's setting as part of the proposed embedded mitigation (as outlined at ES Appendix 8-6, paragraph 2.3.19). Therefore, this comprises an ***indirect, negligible beneficial effect*** to this special quality.
6. *Flower-rich grasslands including floodplain meadows and neutral grasslands and particularly limestone grasslands:* There would be no direct impact on flower-rich grasslands within the CNL as the Scheme is located within its setting. The Applicant identifies the delivery of approximately 119.7 hectares of flower-rich neutral grassland, some of which is located on land adjacent to the CNL's boundary and the Board considers its creation to be an enhancement associated with the Scheme. Therefore, this comprises an ***indirect, minor beneficial effect*** to this special quality.
10. *Extensive dark sky areas:* The Applicant discusses this matter at paragraphs 3.4.58 – 3.4.72 of ES Appendix 8-6 (APP-197) and concludes that *"the Scheme has been designed to ensure that the CNL's dark skies remain entirely intact"* (paragraph 3.4.72). Whilst the Applicant's approach as outlined in Appendix 8-6 is acknowledged, it is noted that no detailed lighting plans or lighting strategy have been submitted and accordingly we also note the Examining Authority's questions

at ExQ1 LV1.16 and LV1.17. As such we would wish to comment further on this matter following the Applicant's response to these questions and potential submission of further information, if possible, by Deadline 4 (10 July 2026).

11. *Distinctive settlements, developed in the Cotswold vernacular with high architectural quality and integrity:* Effects on settlements within the CNL would be indirect and principally would relate to changes in landscape character and visual impact. As outlined below, the Applicant identifies an indirect significant adverse effect on landscape character within the 1 km local study area, an area which includes CNL settlements such as Sherston and Alderton. As such we disagree with the Applicant's assessment that there would be negligible neutral indirect effects on a small number of settlement-edge receptors and consider there would be an ***indirect, moderate adverse effect*** on this special quality.
12. *An accessible landscape for quiet recreation for both rural and urban users, with numerous walking and riding routes, including the Cotswold Way National Trail:* The Applicant assesses "a Minor adverse indirect effect at Year 1 affecting short stretches of certain routes but not the overall recreational experience. By Year 15 the effect would reduce to Negligible". The Board agrees that there may be a slight indirect beneficial impact arising from the creation of new additional and linking 'permissive' Public Rights of Way routes in terms of increasing opportunities to access countryside for informal recreation, although overall we consider that users' experiential and/or perceptual experience of rural countryside within the setting of the CNL would likely be negatively influenced by the contrasting nature and scale of the introduced operational energy infrastructure and ancillary development. As such, we consider that overall, there would be an ***indirect, minor adverse effect*** on access and recreational opportunities within the CNL.
13. *Significant archaeological, prehistoric and historic associations dating back 6,000 years, including Neolithic stone monuments, ancient drove roads, Iron Age forts, Roman villas, ridge and furrow fields, medieval wool churches and country estates and parks:* The Applicant outlines at paragraphs 3.4.97 to 3.4.107 of ES Appendix 8.6 how they have sought to minimise the impact of the Scheme on heritage assets within the CNL, in particular on views from Footpath WT|LUCK|35 which crosses the boundary of the CNL near Site C which have been protected by the removal of panels in C1-C4 to maintain open views of Alderton Church and in Site A fields A11 and A12 would remain as set aside to protect views from Footpath WT|SHER|15 to Sherston Church. This approach has been informed by consultation with the Board. We agree with the Applicant's assessment that the effect on this special quality is ***direct, minor adverse.***

Whilst acknowledging the ExA's question recognises our previous comments on tranquillity, for completeness in terms of comments on the CNL's special qualities, we briefly highlight that 'the tranquillity of the area, away from major sources of inappropriate noise, development, visual clutter and pollution' is special quality 9. Our detailed comments on the potential impacts of construction traffic on the tranquillity of the CNL are outlined below, under 'PMIE 4', though having reviewed the additional information submitted by the Applicant on this matter we consider that the Scheme would lead to a ***direct, major/moderate (significant) adverse*** effect on the tranquillity of the part of the CNL through which construction traffic is to be routed during the Scheme's construction and decommissioning periods. Although these periods would last several years it is acknowledged that this would be a 'temporary' effect in EIA terms.

Therefore, overall, the Board considers the Scheme would have a ***net adverse*** effect upon the CNL's special qualities.

ExQ1 LV1.14: Wiltshire Council and the CNLB are asked to confirm if they are satisfied with the viewpoint and photomontage locations? If not, provide reasoning and a marked-up plan showing any additional viewpoint or photomontages that are considered necessary to assess the impact of the proposed development on landscape and visual receptors

CNLB Response: The Board is satisfied with the selection viewpoint and photomontage locations. During consultation the Board requested several additional viewpoints (CNL A to CNL G) which have been included and assessed within the submission.

ENDS

