

From: [REDACTED]
To: [Lime Down Solar](#)
Cc: ["Stop Lime Down"](#)
Subject: FW: Administrative error Appendix J2 SLD WR
Date: 01 July 2026 15:58:59
Attachments: [Appendix J2 Rainfall Amounts used in the Climate Change Risk Review at Lime Down Stop Lime Down.pdf](#)

Dear Rammiel,

Further to the below, please accept this email as confirmation that Stop Lime Down would like to withdraw REP1-183 (Appendix J2 from Deadline 1) and replace it with the attached correct contents for Appendix J2 of the Stop Lime Down Written Representation.

Kind regards,

[REDACTED]

[REDACTED]

For and on behalf of Stop Lime Down.

From: [REDACTED]
Sent: 26 June 2026 14:22
To: 'Lime Down Solar' <limedown@planninginspectorate.gov.uk>
Cc: 'Stop Lime Down' <info@stoplimedown.com>
Subject: Administrative error Appendix J2 SLD WR

Dear Rammiel,

It has been brought to our attention that there has been an administrative error, on our part, with Appendix J2 to the Stop Lime Down Written Representation (WR).

Appendix J2 should be Rainfall Amounts used in the Climate Change Risk Review at Lime Down (as indicated in the table on Page 6 of our WR). However, the PDF content of Appendix J2 that was submitted by us, is in fact a repeat of content from Appendix F4 Flood risk due to reduced evaporation.

We are enormously apologetic for this erroneous submission and politely request if it would be possible to submit the correct document in its place, as a late submission at the discretion of the Planning Inspectorate?

The correct contents for Appendix J2 of the Stop Lime Down Written Representation is attached, should this be allowed.

Please let me know if this would be acceptable.

Kind regards,

[REDACTED]

[REDACTED]

For and on behalf of Stop Lime Down

Climate Change Resilience and Rainfall Amounts at Lime Down

Summary

1. The Lime Down Climate Change Assessment in the ES [APP-059] uses Met Office data from Yeovilton to conduct the required Climate Change Risk Review. That risk review was necessitated by section 4.10 of NPS EN-1, which directs that the Secretary of State “should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change” (para 4.10.13), and that he “should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be more seriously affected by more radical changes to the climate” when compared to the UK projections (para 4.10.15). As a result, “Adaption measures should be required to be implemented at the time of construction where necessary and appropriate to do so” (para 4.10.19). NPS EN-3 notes that PV sites “may also be proposed in low lying exposed sites” and that for such schemes applicants “should consider, in particular, how plant will be resilient to: increased risk of flooding; and impact of higher temperatures” (para 2.4.11).

2. The Applicant asserts that Yeovilton (68 km from Lime Down) is the closest Met Office station to the site. The Met Office recognises at least 11 closer stations which are suitable for climate change assessment. Yeovilton is a low altitude site in the rain shadow of the moors to the west, and hence has a lower rainfall and higher temperatures than Lime Down. Using data from Yeovilton for the Climate Change Risk Review will give misleading results. The assessment needs to be repeated with more appropriate data.

Introduction

3. I am an [REDACTED] of Geography and Environmental Science [REDACTED] [REDACTED] I have been involved in hydrological research since 1977, first as an environmental scientist in the electrical generation industry working on the effects of acid rain on freshwaters, and after I returned to academic life in 1999, working on modelling and monitoring freshwaters, and hydrology and climate change. [REDACTED] [REDACTED] on climate change and the water environment in England and Wales, and co-led the modelling workpackages of two large EU-funded projects, EUROLIMPACS and REFRESH, which investigated the predicted effects of climate change on waters across Europe.

Assessment

4. Several chapters of the Environmental Statement on the Lime Down Solar Park proposal involve the use of meteorological data to assess risks. These include in particular sections on Climate Change, Hydrology and Flooding, and Ground Conditions and Contamination. Chapter 7 *Climate Change* [APP-059] of the ES, Paragraph 7.7.8, reveals the source of met data for the Climate Change Risk (CCR) review. It states: “The most recent available and completed historic climate data acquired by the Met Office from the closest Met Office Station to the Scheme (Yeovilton) for the 30-year climate period of 1991 – 2020 will provide the current baseline for the CCR Review (Ref 7-39). Yeovilton Met Office Station is approximately 55km to the southwest of the Scheme”.

5. In fact Yeovilton is 68 km from Lime Down, measured to the centre of the Scheme at Hullavington, and even further from the most of the panel sites. It is by no means the closest Met Office climate site. The Met Office provides a website database of measurement sites suitable for climate appraisal at (1). These are chosen to give an even spread over the country and do not include every suitable site. There are at least 11 sites closer to Lime Down than Yeovilton even in this restricted database. These are Lyneham (12 km); Cirencester (23 km); Bath Beechen Cliff (24 km); Filton (30 km); Marlborough (33 km); Cheltenham (40 km); Brize Norton (47 km); Ross on Wye (50 km); Weston Super Mare No. 2 (61 km); Fontwell Magna (66 km) and Oxford (66 km).

6. In choosing a Met Office measurement site to represent Lime Down, geographical closeness is an important factor. There are also well-known factors that strongly affect the main climate parameters over even short distances. In the southern UK, the most important are altitude, exposure to the prevailing SW winds, and proximity to urban areas (e.g. 2). Deciding on a met station which represents the climate of Lime Down should take these into account. The characteristics of the closest six sites in this database, together with Yeovilton, are shown in Table 1, together with the annual rainfall over the most recent standard period, 1991 to 2020. Also shown in the Table is the rainfall in the Lime Down area derived from the HAD-UK gridded observation dataset, likewise for 1991 to 2020, accessed from (3). This is a 1 km grid of rainfall values interpolated from measurement stations, in this case aggregated into 5 km grid squares. The value in the table is the mean of the grid squares at the four corners of the Lime Down rectangle: 856 mm (NW corner); 883 mm (SW); 830 mm (NE); 820 mm (SE).

7. Table 1 shows clearly that Yeovilton is notably unrepresentative of Lime Down. It is much lower altitude and in the rain shadow of the high moors to the west. Correspondingly it has a lower rainfall, at 730 mm, 14% lower than the gridded average for Lime Down.

Station	Distance from Lime Down (km)	Altitude (m asl)	Position	Location	Annual Rainfall (mm)
Met Office Hadley Gridded Rainfall Lime Down	0	76 - 125	Cotswolds	Rural	847
Lyneham	12	140	Chalk Downs	Urban Fringe	771
Cirencester	23	133	Cotswolds	Urban Fringe	823
Bath Beechen Cliff	24	115	Cotswolds	Urban	830
Filton	30	65	Bristol Avon Valley	Urban	820

Marlborough	33	130	Kennet Valley	Urban Fringe	841
Cheltenham	40	68	Severn Valley	Urban Fringe	867
Yeovilton	68	20	Clay Vale	Airfield	730

Table 1: Characteristics of Met Office sites close to Lime Down. Annual rainfall is the average for the period 1991 to 2020.

8. Use of Yeovilton data will underestimate climate change effects by a similar amount. It is not clear from the ES whether Yeovilton data has also been used in hydrological calculations for other chapters, but in its response to Stop Lime Down’s Relevant Representation on this point [PDA-009] SLD082, the Applicant clarifies that it has not. These comments therefore just apply to the Climate change Risk Review in Chapter 7 of the ES.

9. If it is wished to use data from a real site rather than the HAD_UK grid, the Cirencester site (at the Royal Agricultural University) looks the most appropriate site. Though Lyneham is closer, it is further east and has a lower rainfall. There is a Met Office site at Westonbirt Arboretum only 7 km from Lime Down, but it was not instrumented to Met Office standards until relatively recently.

10. If other meteorological parameters from Yeovilton are used to represent Lime Down, they will be similarly unrepresentative.

Applicant’s Response in Relevant Representations

11. In its response to Stop Lime Down’s Relevant Representation on this point ([PDA-009] SLD082), the Applicant states: *“Yeovilton has been used within **ES Volume 1, Chapter 7: Climate Change [APP-059]** as a nearby met station with historic representative weather data in the format required for assessment as sourced from available Met Office data. This site was chosen as it has data available going back to 1964 to best establish the current baseline, though data from a 30year period (1991-2020) was used for the assessment. The data sites which are available can be viewed at <https://www.metoffice.gov.uk/research/climate/maps-and-data/historic-station-data>.”*

12. The Applicant therefore claims that it is using the Yeovilton dataset because it dates back to 1964, to establish the current baseline. However:

- a) Many of the closer and more representative sites will also have data going back to 1964 or earlier;
- b) Since the UK climate has changed considerably since 1964, use of the older data as a baseline would be misleading; and,
- c) The Applicant admits that in any case they start their assessment in 1991.

13. Thus, SLD082 is no proper response to the point: the use of Yeovilton data for the Climate Change Risk Review will lead to a substantial underestimate of climate change effects at Lime Down. A meaningful assessment will require the review to be repeated with more appropriate data. Proper compliance with the assessment as set out in NPS EN-1 and NPS EN-3 can only be secured with the appropriate data used.

References

- (1) <https://www.metoffice.gov.uk/research/climate/maps-and-data/location-specific-long-term-averages/>
- (2) Barry, R. G. and Chorley, R. J. (2009) *Atmosphere, Weather and Climate* Taylor and Francis, London, Chapter 10.
- (3) <https://ukclimateprojections-ui.metoffice.gov.uk/products>