THE EQUESTRIAN SETTING OF THE LIME DOWN SOLAR PROJECT

Evidence relating to the Characterisation and Sensitivity of the Equine Environment around the Lime Down Solar Project
Submission to the Examining Authority at **Deadline 4**
Lime Down Solar Park Development Consent Order (EN010168**)**

Unique Reference Number:[redacted]

1. Purpose of this Submission

1.1. This submission has been prepared to assist the Examining Authority in understanding the character and importance to the local economy of the equestrian setting surrounding the proposed Lime Down Solar.

During the Examination a considerable amount of evidence has emerged from local equestrian businesses, horse owners, professional riders, parish councils and other Interested Parties which suggests that the importance of equestrian businesses and riding of all types in the areas surrounding the scheme is considerably more extensive and diverse than is reflected within the Applicant's Environmental Statement.

This document seeks to draws that evidence together into a single overview.

It has been prepared from information gathered during the Examination, Relevant Representations, local knowledge, site visits, discussions with equestrian businesses and organisations, together with a detailed mapping exercise undertaken to identify equestrian properties and the network of roads and Public Rights of Way regularly used for exercising horses.

Relationship to the ExA's First Written Questions

ExA Question	Principle Issue	Where addressed
SE1.9 (1)	Horses are not standard recreational receptors	Sections 3,4 and 7
SE.1.9(2)	Business viability and employment	Sections 5, 7 and 8
SE.1.9 93)	Mapping of equestrian facilities	Appendix Fig 1and 2
SE1.3	Socio-Economic study area methodology and wider equine economy	Sections 5 and 7
SE1.2	Agricultural and Rural Employment	Section 5, 7 and 8
TT1.13	Receptor Sensitivity	Section 6
TT1.18	Non-Motorised User Delay, Amenity, Severance and Safety.	Sections 4 and 6

1.2. The purpose of this submission is not to suggest that the presence of horses should prevent development in principle.

Rather, it is to demonstrate that the receiving environment has particular characteristics which require careful consideration when assessing the likely significance of environmental effects.

Unlike many recreational receptors, equestrian activity within this locality is not confined to individual facilities or isolated Public Rights of Way (PRoWs). It comprises an interconnected network of commercial businesses, elite sport, breeding enterprises, recreation, heritage and community participation which depend upon the same rural roads, lanes and bridleways affected by the Proposed Development.

It is this interconnected setting, rather than any individual equestrian property, that forms the principal receptor.

1.3. The Applicant has identified a number of equestrian receptors within the Environmental Statement. However, the evidence assembled during the Examination suggests that this identifies only part of the wider equestrian environment surrounding the Scheme and a failure to understand the impact that the Scheme would have on that environment.

This submission considers whether the Environmental Statement adequately reflects:

- The concentration of equestrian activity immediately surrounding the Scheme
- The functional relationship between roads and Public Rights of Way used by equestrians
- The distinction between commercial, professional and recreational equestrian activity
- The seasonal nature of equestrian use; and
- The implications these characteristics have for assessing receptor sensitivity.

1.4. The central proposition of this submission is therefore straightforward.

The equestrian setting surrounding Lime Down is not characterised by isolated horse owners or occasional recreational riders spread around the area.

Instead, the evidence demonstrates an established, extensive and highly interconnected equestrian environment supporting internationally recognised competition, commercial breeding, rural employment, recreation, education and heritage.

The sensitivity of that receiving environment should therefore be considered in the context of its overall character rather than through individual receptor locations alone.

2. The Equestrian Setting of the Scheme

2.1. The countryside surrounding the proposed Lime Down Solar Park has developed over many generations into one of the most distinctive equestrian areas in southern England.

Within a relatively compact geographical area are internationally recognised competition riders, commercial thoroughbred and sport horse breeding enterprises, professional training yards, veterinary practices, nationally important equestrian institutions, riding schools, Pony Club activities, trail hunting, polo and a large community of recreational riders.

Whilst each activity is different, they share one defining characteristic: they all depend upon the same network of rural roads, quiet lanes and PRoWs and tranquillity that surround the Scheme.

This shared dependence creates an equestrian setting whose character is markedly different from that of a typical rural landscape.

2.2 Figure 1 illustrates this clearly

Figure 1 identifies equestrian properties (that is, any property with a recreational or business connection with equestrian activity) within and surrounding the Scheme and the network of roads and Public Rights of Way evidenced as being regularly used for exercising horses. Given time and resources, the focus has been on the area surrounding the solar sites themselves.

Viewed together, these figures demonstrate that equestrian activity is not concentrated at one location, nor confined to designated bridleways. Instead, it forms an extensive and interconnected network extending across the whole of the receiving environment.

The roads are not simply routes to reach bridleways. They form an integral part of the equestrian transport network, linking fragmented rights of way, connecting businesses with exercise routes and enabling the day-to-day management of horses throughout the locality.

This functional relationship is fundamental to understanding the nature of the equestrian setting as a receptor.

3. Understanding the Equestrian Setting – Why it is Particularly Susceptible to Change

3.1 Introduction

The significance of environmental effects depends not only upon the scale of change introduced by a development, but also upon the sensitivity of the receiving environment.

Sensitivity is generally influenced by two principal considerations:

- The susceptibility of a receptor to the type of change proposed; and
- The value or importance of that receptor.

Section 2 has demonstrated the extent and density of equine properties making up the equestrian setting surrounding the Scheme. Section 4 goes on to consider the value and importance of the equine setting surround the Scheme.

The factors described below do not operate independently. Together they explain why equestrian receptors within this locality are more susceptible than would be suggested by the Applicant's surveys (which, in any event, were conducted at an inappropriate time and were for a short period).

3.2 The Equestrian Network Functions as a Connected System

Unlike many recreational activities, equestrian use cannot be understood by considering individual routes or isolated facilities.

Figure 1 demonstrates that horses are exercised across an extensive network of rural roads, lanes and Public Rights of Way. These routes are functionally connected. Public highways are routinely used to link fragmented bridleways, access quieter exercise routes, move horses safely between grazing land and yards, and undertake daily conditioning work.

The road network therefore forms part of the equestrian infrastructure rather than simply providing access to it.

A restriction, reduction in amenity or increase in perceived risk affecting one part of this network has the potential to influence use of a much wider area. This interconnectedness is a defining characteristic of the equestrian setting and has not been fully reflected within the Applicant's assessment.

3.3 Daily Operational Dependence

Unlike many recreational activities that can be postponed or relocated, the management of horses is a daily requirement.

Commercial breeding enterprises, competition yards, liveries and private horse owners all require regular exercise, turnout, veterinary access and routine movement of horses throughout the year.

For many businesses these movements are fundamental to normal operation rather than discretionary.

Construction activity extending over a prolonged period therefore has the potential to influence day-to-day management practices in a way that differs materially from occasional recreational use.

Such construction work also has the potential to produce noise and vibration, including through traffic movements but also the building out of the scheme (e.g. through piling) which will cause stress and flight response in horses. Similarly in the operational phase noise and also glint and glare has the potential to produce the same response in horses. This is again a material harm and one which is hard to avoid.

This is particularly relevant within an area where commercial equestrian activity forms an important part of the rural economy.

3.4 Public Roads are an Essential Part of Horse Management

The Applicant's assessment places considerable emphasis on Public Rights of Way.

Whilst these routes are important, they represent only one component of the local equestrian network.

The mapped evidence assembled during the Examination demonstrates that local roads and quiet rural lanes are used extensively by equestrians because many bridleways are fragmented and do not provide continuous off-road access.

In practice, horses frequently travel along public roads in order to reach safer off-road riding, gallops, woodland tracks or circular exercise routes.

Consequently, any assessment that focuses primarily upon designated bridleways risks underestimating the extent of equestrian activity potentially affected by changes to the surrounding highway network.

Evidence gathered confirms that this road use is not simply a consequence of fragmented rights of way. Respondents consistently explained that roadwork forms an essential part of horse management, being used to develop fitness, strengthen tendons and ligaments, improve bone density, rehabilitate injured horses and safely introduce young horses to traffic before they undertake more demanding work. These activities cannot readily be replicated within arenas or enclosed fields.

3.5 Commercial Equestrian Activity Cannot Easily Relocate

The Applicant's assessment largely considers equestrian users as a single receptor group.

However, the evidence demonstrates that the receiving environment supports a broad range of commercial enterprises including thoroughbred breeding operations, competition yards, liveries, vets and associated equestrian services.

These businesses have developed within this locality because of its existing characteristics, including the availability of quiet rural roads, interconnected riding routes, experienced equestrian professionals and supporting infrastructure.

Unlike occasional recreational activity, commercial equestrian businesses cannot simply relocate their daily operations or suspend exercise routines during extended periods of construction.

Their continued success depends upon maintaining safe, predictable access to the surrounding network.

Several commercial and competition yards have responded that relocating horses elsewhere for daily exercise is not a realistic operational alternative. Doing so would require additional staffing, horse transport and time, fundamentally altering established business practices and increasing operating costs.

3.6 Horse Behaviour and Rider Safety

Horses are large prey animals whose behavioural responses differ fundamentally from those of pedestrians or cyclists.

Although many horses become accustomed to normal rural traffic, where drivers are generally familiar with horses and at pains to slow down or stop and to give them a wide birth. Sudden changes in their surroundings, unfamiliar construction activity, abnormal

loads, increased HGV movements, temporary traffic management and associated noise can alter both horse and rider behaviour and increase risks to horses and riders.

This is recognised within national equestrian guidance and explains why riders often seek quiet roads and predictable traffic conditions when exercising horses.

The issue is therefore not simply one of physical access. It is also one of confidence, safety and the continued suitability of established exercise routes.

Respondents also describe the importance of gradually introducing young or previously nervous horses to normal rural traffic in controlled conditions. They expressed concern that prolonged construction traffic, abnormal loads and frequent HGV movements would fundamentally alter those training environments and reduce opportunities for safe rehabilitation and confidence-building.

3.7 The Duration of Construction is Material

The Proposed Development would involve a prolonged construction programme extending over approximately two years.

This is not comparable to temporary highway works or short-term disruption.

For commercial businesses, breeding enterprises and regular riders, the effects would coincide with multiple breeding seasons, competition seasons, trail hunting seasons and the routine daily management of horses.

The duration of construction is therefore an important consideration when assessing susceptibility.

3.8 Cumulative Effects Across an Interconnected Setting

The sensitivity of the receiving environment does not arise solely from the presence of individual equestrian properties.

It arises because numerous businesses, professional riders, recreational users and equestrian organisations operate within the same interconnected landscape and depend upon many of the same roads and Public Rights of Way.

Consequently, relatively modest changes experienced by individual users have the potential to become more significant when considered collectively across the wider equestrian setting.

This cumulative characteristic distinguishes the Lime Down equestrian setting from one where equestrian activity is isolated or incidental.

4. Evidence Supporting the Characterisation of the Equestrian Setting

4.1 Introduction

The purpose of this section is not to catalogue individual equestrian facilities or achievements, but rather to emphasise the importance of equestrian activity in the area.

Taken collectively, these examples demonstrate that the Scheme lies within an established equestrian setting characterised by commercial breeding, elite competition, professional training, recreation, heritage and associated rural businesses.

No single example is relied upon in isolation. Instead, together they illustrate the exceptional concentration and diversity of equestrian activity immediately surrounding the Proposed Development.

4.2 Elite Competition and Professional Equestrian Sport

The local area supports an exceptional concentration of professional equestrian activity. Current residents include Olympic medallists, international event riders, Grand Prix dressage riders, international trainers and leading polo players whose daily professional activities rely upon exercising horses within the surrounding road and Public Rights of Way network. Examples include Laura Tomlinson MBE, Kitty King, Alicia Hawker and Sarah Stewart BHSI.

The significance of these individuals is not their personal achievements, but what their presence demonstrates about the character of the locality.

Professional riders choose to establish themselves where suitable infrastructure, experienced support services and safe exercising routes exist. Their continued presence reflects the long-established suitability of this area for high-level equestrian activity.

4.3 Commercial Breeding and the Bloodstock Industry

The area also supports an established concentration of commercial breeding enterprises forming part of the United Kingdom's internationally recognised bloodstock industry.

These include internationally trading thoroughbred studs, sport horse breeding establishments, youngstock producers and specialist sales preparation yards. Examples include West Park Farm, Ladyswood Stud, Estcourt Park Stud (Juddmonte Farms), New Prior Stud, West Kington Stud, Kington Langley Stud and Park Wood Stud.

Unlike recreational horse ownership, these are commercial businesses whose operation depends upon the routine movement, safety and management of valuable horses throughout the year.

Broodmares, foals, yearlings and young competition horses require regular handling, exercise and veterinary attention using the surrounding network of roads and tracks.

These businesses demonstrate both the economic importance of the equestrian sector and its dependence upon the surrounding rural infrastructure.

4.4 Historic Equestrian Institutions

The wider setting has been shaped by equestrian activity over many centuries.

The Duke of Beaufort's Hunt (Trail hunting)

The Duke of Beaufort's Hunt is one of the oldest hunting institutions in the world. It has operated across this area since the seventeenth century and remains one of Britain's most distinguished hunts. Its country extends across approximately 760 square miles, encompassing the entirety of the Proposed Development and surrounding villages.

During the trail hunting season, substantial numbers of mounted riders (200+) use the same roads, tracks and rights of way identified within Fig. 1 and 2.

Recent meets at East Dunley Farm, Lordswood Farm, Lordswood House, Foxley Manor, Badminton and Easton Grey House illustrate that organised equestrian activity remains an established part of the local environment.

This level of activity is inherently seasonal and could not reasonably be expected to be represented by a single week of survey work undertaken in late May.

Badminton Horse Trials

Approximately 4km west of the Scheme lies Badminton Horse Trials, one of only a small number of five-star eventing competitions held worldwide. Each year Badminton attracts competitors and spectators (200,000+) from across the world and generates exceptionally high volumes of horse transport, equestrian traffic and associated rural activity throughout the surrounding road network.

The relevance of Badminton within this submission is not that the event itself would necessarily experience direct effects from Lime Down.

Rather, Badminton demonstrates the established equestrian character of the surrounding area.

The international reputation of the event has contributed to the development of a unique concentration of riders, trainers, breeders, support services and equestrian businesses throughout the locality over many decades.

It is one of the defining characteristics of the equestrian setting of this area.

4.5 Polo

Polo in this area has documented roots to 1872, when Colonel Frank Henry established the first polo club in Norton (directly within the Lime Down scheme) after returning from the regiment credited with introducing polo to England. Its founding members were drawn from the Beaufort Hunt.

The modern Beaufort Polo Club is now based at Westonbirt (approx. 4 miles from Lime Down sites) is now run by Luke and Mark Tomlinson, both England polo captains and HRH King Charles III has served as patron.

Together with associated training establishments and players located within and immediately surrounding the Scheme, polo contributes a further dimension to the equestrian setting.

Unlike many other equestrian disciplines, polo requires strings of ponies to be exercised daily. These movements rely upon the same interconnected network of quiet roads and rural lanes used by other equestrian businesses.

This further illustrates that the surrounding highway network supports a wide range of equestrian activity extending well beyond recreational riding.

4.6 Community Participation

The equestrian setting is equally important at community level. The area supports riding schools, Pony Club activities, unaffiliated competitions, trail hunting, pleasure riding, endurance riding and a large number of private horse owners.

Facilities such as the paddocks on Avil's Lane (The Pony Project charity) provide opportunities for children and young people to participate in equestrian sport immediately adjacent to the Scheme.

This demonstrates that the equestrian setting supports participation at every level, from first-time riders through to Olympic competition.

Its value therefore extends beyond commercial activity alone.

4.7 A Supporting Rural Economy

The equestrian setting also supports a wider network of rural businesses whose success depends upon the continued presence of equestrian activity.

These include specialist veterinary practices, farriers, feed merchants, transport operators, saddlers, physiotherapists, instructors, fencing contractors and other equestrian service providers.

Many of these businesses have developed specifically because of the concentration of horses and equestrian enterprises within the locality. Many horses are kept in livery yards to be able to hack around the rural lanes and tracks safely. The loss of any horse to a yard will have a direct economic impact on the yard, it’s staff and also on the farrier, feed merhcannt and others who provide services to that yard.

Accordingly, the equestrian setting should not be viewed solely as a recreational resource, but as an established component of the local rural economy.

4.8 Summary

The evidence presented above demonstrates a receiving environment that is unusual both in its concentration and diversity of equestrian activity. Professional competition, commercial breeding, recreation, heritage, education and rural business are not separate receptors operating independently.

They are interconnected components of a single equestrian setting which has evolved over many generations and depends upon the same network of roads, lanes and Public Rights of Way.

This wider context is fundamental to understanding the importance, and therefore the sensitivity of equestrian receptors surrounding the Scheme.

4.9 Evidence from the local equestrian community

During preparation of this submission additional information was obtained from commercial equestrian businesses, competition riders and recreational horse owners across the scheme area. Although representing different disciplines, the responses demonstrated remarkable consistency. They confirmed that horses are exercised routinely throughout the year using an interconnected network of roads and PRoWs, that roadwork forms an essential component of horse management and that the principal concerns relate to safety, loss of established exercise routes and the operational consequences of prolonged construction activity.

5. Comparison with the Applicant's Assessment

5.1 Introduction

The previous sections have described the character of the equestrian setting surrounding the Scheme and the factors that contribute to its sensitivity.

This section considers that evidence alongside the methodology adopted within the Applicant's Environmental Statement.

The intention is not to repeat matters already addressed elsewhere during the Examination, but to assist the Examining Authority in considering whether the equestrian receiving environment has been fully characterised before the significance of likely effects is determined.

5.2 The Assessment Focuses on Individual Facilities Rather than the Receiving Environment

The Applicant's assessment identifies a number of equestrian facilities and recreational receptors within the study area and cable corridor and considers their likely interaction with the Proposed Development.

That approach is understandable when assessing individual visitor attractions or recreational facilities. However, the evidence assembled during the Examination suggests that equestrian activity within the Lime Down area functions differently.

Rather than comprising a series of independent destinations, the receiving environment is characterised by an extensive network of commercial businesses, professional riders, recreational users and supporting services that operate collectively across the wider countryside all adding to the economy of the immediate area.

Fig 1 and 2 demonstrate this distinction.

The principal receptor is therefore not simply an individual riding establishment or a particular bridleway, but the wider equestrian setting that supports them all.

This distinction is important because receptor sensitivity depends upon the character of the receiving environment as a whole rather than individual facilities considered in isolation.

5.3 The Functional Riding Network

The Applicant's assessment recognises Public Rights of Way that are likely to experience direct effects from the Scheme.

The evidence gathered during the Examination suggests that this captures only part of the network routinely used by equestrians. Figure 1 demonstrates that roads and quiet rural lanes are used extensively to connect fragmented bridleways, reach off-road exercise routes and undertake routine horse management.

For many equestrian users, these roads are not an alternative to PRoW they are an integral component of the riding network.

Consequently, changes affecting the local highway network have the potential to influence equestrian activity more widely than would be indicated by considering designated bridleways alone.

5.4 Distinguishing Different Types of Equestrian Receptor

The evidence assembled during the Examination also suggests that equestrian activity within the locality encompasses a broad spectrum of users with different operational requirements.

These include:

- Internationally recognised competition riders
- Commercial breeding enterprises
- Professional training establishments
- Veterinary and associated equestrian businesses
- Trail hunting and polo activities
- Riding schools and charitable organisations
- Recreational riders – whether keeping their horse at home or at livery

Whilst all involve horses, their susceptibility to environmental change is not necessarily the same.

Commercial breeding enterprises, for example, are dependent upon the routine movement of mares, foals and youngstock throughout the year and responsible for staff safety.

Professional competition yards require regular exercise programmes and safe access to surrounding routes. Recreational riders may have greater flexibility in how and when they ride. The evidence therefore suggests that considering these varied activities collectively as a single receptor group may not fully reflect their differing sensitivities.

5.5 Survey Methodology

The Applicant's Non-Motorised User surveys provide a snapshot of activity during the survey period. However, the evidence assembled during the Examination indicates that a single

week of survey work during an unrepresentative week does not properly represent the complexity of equestrian activity within this locality.

Equestrian use varies considerably according to:

- Season
- Weather conditions
- Trail hunting calendars
- Breeding activities
- Competition schedules
- School holidays
- Daylight hours.

In addition, horses are routinely exercised at different times of day depending upon weather conditions and management practices.

The survey period also coincided with an Amber Heat Health Alert and half term, during which many horse owners altered normal exercise routines in the interests of horse welfare.

The survey results should therefore be interpreted as a snapshot of activity during one particular period rather than a comprehensive representation of annual equestrian use.

5.6 Commercial Activity

The evidence presented within this submission indicates that the equestrian setting supports a substantial rural economy extending beyond the individual equestrian facilities identified within the Environmental Statement.

Commercial breeding studs, veterinary practices, farriers, transport providers, feed suppliers and numerous specialist services collectively contribute to the economic character of the locality.

The purpose of this observation is not to suggest that every individual business should necessarily have been assessed separately as a receptor though the economic impact to each business does not appear to have been assessed, it is to demonstrate that the concentration of commercial equestrian activity forms part of the baseline character of the receiving environment and is relevant when considering receptor sensitivity.

5.7 Overall Characterisation of the Equine Setting as the Receiving Environment

Taken individually, each of the matters described above might reasonably be regarded as a limitation inherent within any broad environmental assessment.

Taken collectively, however, they suggest that the equestrian setting surrounding the Scheme is more extensive, more interconnected and more operationally dependent upon the surrounding road and rights of way network than is apparent from the Environmental Statement alone.

The evidence assembled during the Examination therefore indicates that the equestrian receiving environment may not have been fully characterised before judgements regarding receptor sensitivity were reached.

Applicant's assessment	Evidence assembled during examination
Individual equestrian facilities	Interconnected equestrian setting
PRoWs	PRoWs **AND** local roads
Short duration survey's	Year-round operational use
General equestrian receptors	Commercial, professional and recreational receptor groups
Individual locations	Continuous network across the scheme

Common Themes from responses:

Theme	Evidence
Daily Riding	Most exercise horses 4-7 days per week
Roads	Essential for roadwork and linking fragmented bridleways
Commercial	Businesses cannot simply relocate exercise and ensure staff safety
Young horses	Roads used to introduce horses safely to traffic
Rehabilitation	Roads important for recovery programmes
Construction	HGVs and traffic expected to reduce safety and confidence

6. Implications for the Examination

6.1. The purpose of this submission is not to suggest that equestrian activity should prevent development in principle but it seeks to assist the Examining Authority by demonstrating that the equestrian receiving environment surrounding the Scheme possesses characteristics which appear more extensive, interconnected and operationally dependent upon the surrounding road and Public Rights of Way network than is reflected within the Environmental Statement.

The significance of any environmental effect depends not only upon the scale of change introduced by a development, but also upon the sensitivity of the receptor affected.

Accordingly, an accurate understanding of the receiving environment forms an essential foundation for any subsequent assessment of likely significant effects.

6.2. The evidence assembled during the Examination suggests that the equestrian setting surrounding Lime Down comprises considerably more than a collection of individual equestrian facilities.

It functions as an interconnected environment supporting:

- Commercial breeding enterprises
- Professional competition yards
- Internationally recognised riders
- Veterinary and equestrian service providers
- Trail hunting, polo and recreational riding
- Education and youth participation
- A substantial rural equestrian economy

These activities depend upon many of the same roads, lanes, PRoWs and general tranquility.

Understanding this interconnected character is fundamental when considering sensitivity to environmental change.

6.3. This submission does not seek to substitute one professional assessment for another. Nor does it seek to quantify impacts that have not yet occurred.

Instead, it provides additional contextual evidence assembled during the Examination which may assist the Examining Authority when considering whether the Environmental Statement has fully characterised the equestrian receiving environment against which impacts have been assessed.

It is respectfully suggested that this wider and more concentrated equine context should be considered alongside the Applicant's assessment when determining the sensitivity of equestrian receptors.

6.4. Should the Examining Authority conclude that the equestrian receiving environment is more extensive, more concentrated and/or more sensitive than originally characterised, this may be relevant when considering:

- The significance attributed to environmental effects
- The adequacy of proposed mitigation
- The assessment of cumulative effect
- The construction and traffic management plans
- Whether the Environmental Statement provides a sufficiently complete understanding of the receiving environment.

7. Conclusions

7.1. The evidence presented within this submission demonstrates that the countryside surrounding the proposed Lime Down Solar is an established and highly interconnected equestrian setting.

That setting supports elite competition, commercial breeding, professional training, rural businesses, recreation, education and heritage, all of which rely upon the same network of local roads, rural lanes, PRoWs and the general tranquility of the area.

It is this interconnected character, rather than any individual equestrian facility, which defines the receiving environment.

7.2 The mapping undertaken during the Examination demonstrates that equestrian activity extends throughout the Scheme and its surroundings.

Figures 1 illustrates both the concentration of equestrian properties and the extensive network of roads and Public Rights of Way routinely used for horse management and exercise.

Taken together, they provide a picture of the receiving environment that differs materially from one based solely upon individual facilities or short-duration observations.

7.3 The evidence assembled during the Examination also demonstrates that commercial, professional and recreational equestrian activities are closely interconnected.

Stud farms, competition yards, riding schools, veterinary practices, farriers, Pony Club activities, trail hunting, polo and private horse owners all contribute to the character of the locality and rely upon many of the same routes and infrastructure.

This overall character is a defining feature of the equestrian setting.

7.4 This submission respectfully suggests that the equestrian receiving environment surrounding the Scheme may be more extensive, more concentrated, more interconnected and more sensitive to environmental change than is apparent from the Environmental Statement alone.

I therefore ask The Examining Authority to consider this evidence alongside the Applicant's assessment when reaching its conclusions on receptor sensitivity and the significance of likely environmental effects.

Appendix

Fig. 1.
Map identifying equine properties (businesses in red) and hacking routes in green (roads and PRoWs)

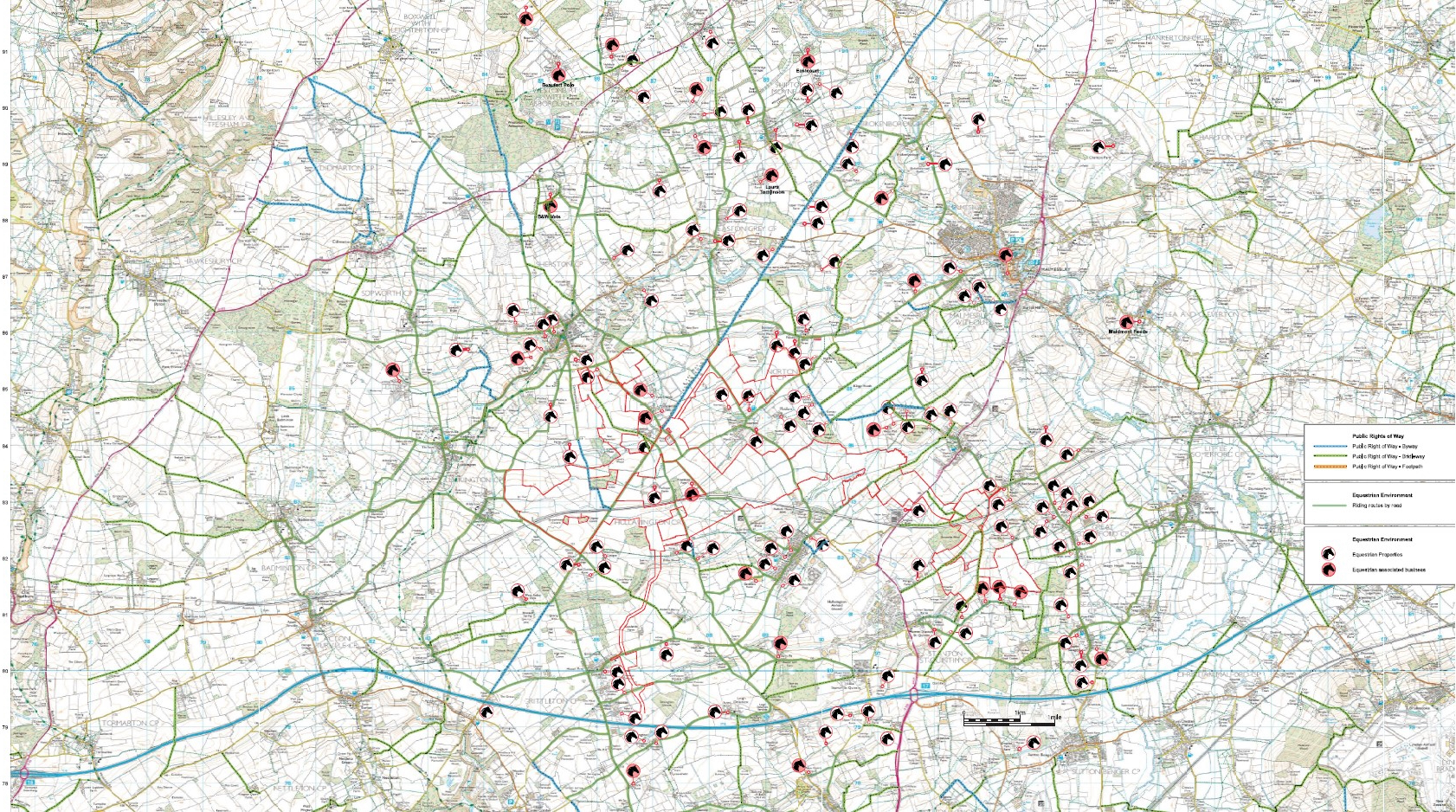
Fig 2.
Map identifying routes - roads (Green) and PRoWs (Yellow)

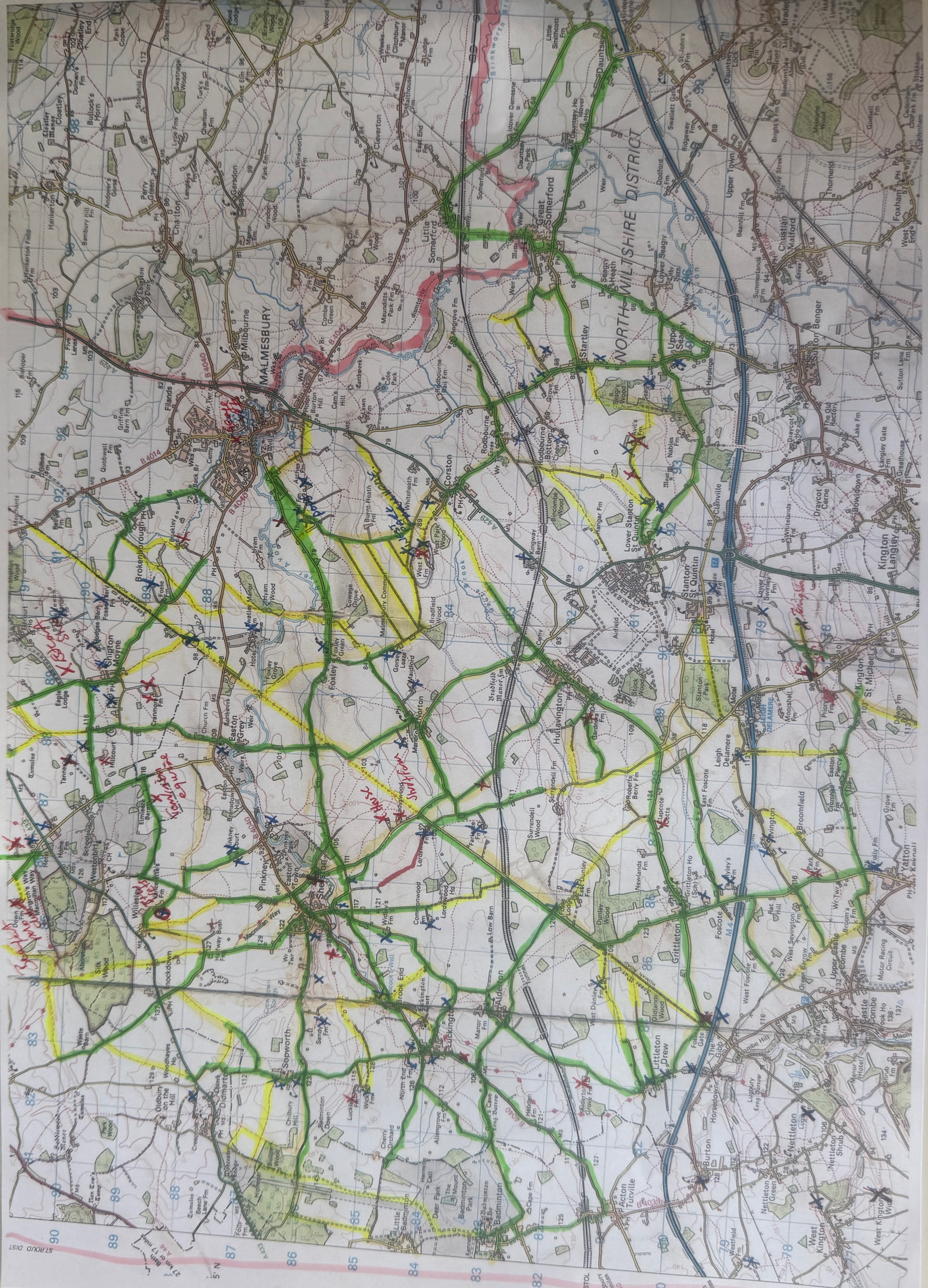
3. Email response from IGP on West Park Farm Assessment

This email confirms that the Applicant assessed West Park Farm as a local livery yard because “its operations could not be determined from publicly available information”.

This is despite extensive engagement during the Applicant's 2024 and 2025 consultation, including written representations, in person consultation events, a meeting between myself and IGP representatives at Bradfield Manor, a site visit to Ladyswood Stud, and two Racing Post articles (2024 & 2025)

The result is that the ES conclusions about West Park Farm are not just based on a guess and a business which doesn’t exist, they are based on a guess made in apparent ignorance of information the Applicant already held.


Public Rights of Way
Public Right of Way - Byway
Public Right of Way - Bridleway
Public Right of Way - Footpath
Equestrian Environment
Riding routes by road
Equestrian Environment
Equestrian Properties
Equestrian associated business
1km
mile
Sudbury Park
Eastwell
Laurie Tomlinson
RAW Vets
Maidwell Feeds
BOXWELL WITH LECKHAMPTON CP
HILLESLEY AND TRESHAM CP
TINDMARTON CP
HAWKESBURY CP
TOPWORTH CP
BADMINTON CP
ACTON TURVILLE CP
TORMARTON CP
RETTLETON CP
ALDERTON CP
HILLESLEY CP
ROKEMARSH CP
BARTON CP
HANNINGTON CP
SUTTON BENDER CP
CHIPPENHAM FOREST CP


NORTH WILTSHIRE DISTRICT
MALMESBURY
Charlton
Little Somerford
Great Somerford
Startley
Upper Seagry
Lower Seagry
Upper Town
Christian Malford
Sutton Benger
Foxham
Dauntsey
Idover Demesne
Dauntsey Park
Dauntsey Lock
Swallett Gate
Ridgeway Fm
Dodford
Thornend
Cadenham
Stokkeign
Cloatley
Cloatley End
Bullock's Horn
Perry Green
Hankerton
Garsdon
Cleverton
Lea
Milbourne
Filands
Brokenborough
Shipton Moyne
Foxley
Easton Grey
Norton
Hullavington
Leigh Delamere
Corston
Rodbourne
Rodbourne Bottom
Lower Stanton St Quintin
Stanton St Quintin
Clanville
Kington Langley
Kington St Michael
Yatton Keynell
Pinkney
Sherston
Westonbirt
Sopworth
Luckington
Alderton
Didmarton
Oldbury on the Hill
Badminton
Little Badminton
Acton Turville
Grittleton
Foscote
Littleton Drew
Burton
Nettleton
West Kington
Broomfield
Upper Castle Combe
Castle Combe
Motor Racing Circuit
Macmillan Way
Fosse Way
Roman Road
M4
A429
A4
B4014
B4040
B4042
B4069
B4039
STROUD DIST
BRISTOL
Bath 27 km or 17 miles
5' N

From: info@limedownsolar.co.uk [redacted]
Subject: Re: West Park Farm Assessment
Date: 26 June 2026 at 12:34
To: [redacted]

Dear January,

Thanks again for getting in touch, and for your patience while we reviewed this.

We can confirm that West Park Farm was identified in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], and assessed as an equestrian facility. ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241], page 124, identifies West Park Farm and confirms it was carried forward for detailed assessment because likely effects from the Scheme were identified. At this point, West Park Farm was identified as an equestrian business, although the full extent of operations was not known. Initial observations were made onsite by the Applicant's landscape and visual impact assessment consultants from Lime Down D and public rights of way to determine the visual relationship between West Park Farm and Lime Down D. This was followed by a desk-based search by the socio-economics consultant for business information at West Park Farm to identify the nature of operations. Whilst the physical extent of paddocks, buildings, and stabling was evident, the type of operations could not be determined from information available online or advertised 'on-the-ground'. As such, West Park Farm was assumed to be a livery business with clientele most likely to be from the surrounding area (Wiltshire and Gloucestershire), and assessed as such.

Appendix 16-2, page 1, explains that tourism and recreation receptors, including equestrian facilities, were screened by considering likely views and landscape character, effects on use and desirability for visitors and users, and impacts on accessibility from HGV movements or changes to vehicular and non-vehicular access routes. For West Park Farm, Appendix 16-2 identifies immediate views of Lime Down D, potential loss of amenity and desirability, likely effects on local hacking routes, and potential accessibility and delay impacts due to Scheme traffic.

These matters are assessed in Chapter 16 with reference to the relevant technical assessments. Views, setting and landscape character are informed by ES Chapter 8: Landscape and Visual [APP-060]. Disruption and noise during construction are informed by ES Chapter 14: Noise and Vibration [APP-066], and the in-combination assessment in ES Chapter 21 [APP-073] also identifies West Park Farm as a receptor where landscape and visual effects interact with noise and vibration effects. Access, hacking routes and traffic-related delay are assessed with reference to ES Chapter 13: Transport and Access [APP-065], the Transport Assessment [APP-233], the Outline Construction Traffic Management Plan [APP-287], and the Outline Public Rights of Way and Permissive Paths Management Plan [APP-282].

The relevant assessments were undertaken in accordance with standard EIA methodology. This included desk-based identification of receptors, consideration of traffic and noise survey data, modelling, professional judgement, and site visits and fieldwork within the surrounding study area.

Further details are provided in the relevant ES chapters and in ES Volume 1, Chapter 6: EIA Methodology [APP-058].

These matters are then collectively assessed within ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] to determine the likely impact to a 'tourism and recreation' receptor. It is from the assessment of impacts to all receptors across the Scheme that a collective impact on an industry's employment and economic performance has been assessed. For the case of stud farms and liveries, this is considered as part of the agriculture industry under the collective description of 'rearing of animals', while eventing venues and riding schools are considered under 'sports and recreation'. Employment and the economic performance of individual businesses (including any equestrian businesses) were not assessed for any part of the Scheme.

Further to the publication of the Examining Authority's First Written Questions [PD-010] for the Lime Down Solar Park Examination, the Applicant has been requested to provide a more detailed assessment of potential impacts on job losses and business viability within the equine sector and its supporting industries. The relevant question is set out at SE1.9 of PD-010, which can be viewed here.

To support this work, please find attached an Equine Sector Business Questionnaire. We have also sent a copy directly to yourself and Dermot for completeness. The purpose of the questionnaire is to gather up-to-date and detailed information from business owners and practitioners working in the equine sector, so that the Applicant can provide a robust assessment in response to the Examining Authority's request.

The questionnaire asks for information about your business operations, employment, income and operating costs, site-specific uses, any concerns relating to the Scheme, and any mitigation or future engagement that may be helpful. Please provide as much information as you are comfortable sharing.

We would be grateful if you could complete and return the questionnaire by **Friday 3 July 2026** to info@limedownsolar.co.uk.

If you have any questions about the information provided, the questionnaire, or would like to discuss any of the information requested, please do not hesitate to contact the project team using the details below.

Kind regards,
Kate
Community Relations Team
Lime Down Solar Park

- T: 0808 175 6656
- E: info@limedownsolar.co.uk
- FREEPOST Lime Down Solar

From: info@limedownsolar.co.uk <info@limedownsolar.co.uk>
Sent: Wednesday, June 3, 2026 12:37 PM
To: [redacted]
Subject: Re: West Park Farm Assessment

Dear January,

Thank you for getting in touch.

We have passed your enquiry to the relevant members of the project team for review and will come back to you as soon as possible. Thank you for your patience in the meantime.

Kind regards,
Kate
Community Relations Team
Lime Down Solar Park

- T: 0808 175 6656
- E: info@limedownsolar.co.uk
- FREEPOST Lime Down Solar

From: [redacted]
Sent: Tuesday, June 2, 2026 2:28 PM
To: info@limedownsolar.co.uk <info@limedownsolar.co.uk>
Subject: West Park Farm Assessment

You keep saying in DCO submissions that you have assessed West Park Farm and I would be grateful if you could explain how this has been done.

We are not aware anyone from IGP has been to West Park Farm. I therefore presume

this has been a desk top study and I'm wondering if you or the person doing the assessment took into account our business?

Were you aware of the nature of our business prior to receipt of my RR and WR?

You appear to continue to disregard the specific nature of our equine business and have not addressed any of my concerns.

Regards,

January Farrington

Lime Down Solar Park Letter from Will Threlfall.pdf
197 KB

Lime Down Solar Park Equine Sector Business Questionnaire...
147 KB