

Lime Down Solar Park Development Consent Order (EN010168)  
January Farrington  
Unique Reference Number: [REDACTED]

## **Deadline 5 Submission**

### **Observations following the Applicant's Deadline 4 Responses and the Reliability of the Applicant's Assessment.**

This submission should be read alongside my Relevant Representation, Written Representation, oral submissions, Deadline 3 response and Deadline 4 submission concerning the equestrian setting of the Scheme. I wish to comment on what the Examination itself has revealed. A consistent pattern has emerged whereby important receptors and impacts were either incorrectly characterised, excluded from assessment or only investigated after they were raised by Interested Parties and the Examining Authority. The Applicant's conclusions were often reached before it had properly understood the places, businesses and practical realities it was assessing.

### **The Applicant's assessment of West Park Farm**

Throughout the Examination I have consistently questioned how West Park Farm had been assessed.

The Applicant repeatedly relied upon that assessment in responding to my submissions and maintained that West Park Farm had been specifically assessed and that no significant residual effects on its operation were anticipated. It later accepted that the business operations themselves had not been assessed because individual business performance fell outside the scope of its assessment. Those two positions are difficult to reconcile.

Following my request for clarification, it became clear that the assessment had been based largely on external observations and an online search, which failed to identify the true nature of our business.

This is significant not because a mistake was made, but because it occurred despite more than two years of consultation. During 2024 and 2025, Dermot and I engaged directly and at length with the project team, both in writing and in person, including a meeting at Bradfield manor with Will Threlfall and three other members of the Applicant's team. During the same period, two Racing Post articles were published, and I understand the Applicant visited Ladyswood Stud. The nature of the equine businesses within this landscape, including West Park Farm, was therefore communicated clearly throughout the consultation process. The Applicant therefore had repeated opportunities to understand West Park Farm that extended far beyond an online search.

For me, this raises a much wider question. If a specialist business immediately adjacent to the Scheme was not properly understood despite extensive engagement, what confidence can be placed in the wider assessment of businesses and receptors throughout the Scheme?

The same concern extends beyond West Park Farm. I remain unconvinced that businesses such as Whatley Manor have been understood sufficiently for the Applicant's socioeconomic conclusions to command confidence.

## **The Examination has identified further gaps**

The Examination has also demonstrated that important information has continued to be sought well after submission of the DCO application.

Examples include:

- The late equine business questionnaire
- Further consideration of equine receptors
- Continuing requests for clarification regarding rural roads and vulnerable users
- Additional flood survey work
- Further information requested by the Examining Authority on socio-economic effects

I welcome the Applicant undertaking further work however, I remain concerned that much of this work appears to be filling gaps in the original assessment rather than simply refining an already robust evidence base.

## **Rural roads**

The July hearings reinforced many of the concerns previously raised by local residents. The ExA questioned the Applicant's assumptions regarding rural road use, horse riders and other vulnerable users and continued to seek further clarification regarding usable road widths and passing arrangements.

These discussions reflected the reality experienced daily by those living and working here. Our local roads are not simply routes between villages. They are an essential part of the area's farming, equestrian and recreational infrastructure.

The issue is not simply whether construction vehicles can physically use these roads. It is whether they can safely coexist with the farming, equestrian and recreational activities that already depend upon them every day.

I also remain concerned about the reliability of the Applicant's NMU surveys. Further surveys have again been undertaken over a relatively short period during the school holidays and exceptionally hot weather, when use of local roads and PRow would not necessarily be representative of normal conditions. In addition, the location of some recent survey cameras appeared unlikely to capture the full extent of movement along certain routes. I respectfully ask the Examining Authority to exercise caution when placing significant weight on short-duration surveys when there is substantial local evidence demonstrating more extensive everyday use.

## **Cumulative Development**

I also remain concerned that Lime Down continues to be considered largely in isolation. Other consented or proposed solar development, including Five Lanes Solar, Red Barn Solar and Leigh Delamere Solar, have the potential to place additional pressure on the same

communities and transport network. The practical cumulative effects are not limited to landscape and visual impact. They include overlapping construction programmes, shared road use, increased HGV movements and the progressive industrialisation of what is currently a predominantly rural landscape.

## **Consultation**

At the beginning of the Examination, Stop Lime Down submitted concerns regarding the adequacy of the Applicant's consultation. Having followed the examination closely, I believe many of those concerns have subsequently proved to be well founded and do not understand why these concerns were dismissed so easily.

Consultation is only meaningful if the information gathered is used to inform the assessment. The experience of West Park Farm alone suggests that this did not happen.

## **Confidence in the Applicant's assurances has inevitably been affected by the cumulative experience of this Examination.**

The incorrect assessment of West Park Farm, the need for further questionnaires and assessment work during the Examination, unauthorised survey access to our land, and the continuing reliance on information and mitigation to be provided at later stages have, taken together, made it increasingly difficult to place confidence in assurances that outstanding matters can simply be resolved after consent. I respectfully ask the Examining Authority to take this wider context into account when considering the weight to be attached to the Applicant's evidence.

## **Concluding observations**

Throughout this Examination I have tried to provide factual, site-specific evidence based upon my own experience and the operation of West Park Farm. I appreciate the additional work undertaken by the Applicant during the examination. Nevertheless, I remain concerned that many important matters have only been revisited after they were raised by IPs or by the Examining Authority.

For me, the issue is not simply whether I agree with individual conclusions, it's whether those conclusions were reached using a sufficiently accurate understanding of the receiving environment. I do not believe the applicant has a sufficiently accurate understanding of the receiving environment to reach the conclusions set out in their Environmental Statement. The events of this Examination suggest that, in several important respects, it does not. I respectfully ask the Examining Authority to bear that in mind when considering the weight to be attached to the Applicant's evidence and the conclusions drawn from it.