



Statement of Common Ground with Wiltshire Bridleways Association (Clean)

August 2026

Revision 3

Planning Inspectorate Reference: EN010168

Document Reference: EXAM/8.17

The Infrastructure Planning (Examination Procedure) Rules 2010

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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 Wiltshire Bridleways Association.

Signed on behalf of Lime Down Solar Park Limited

Name:

Position:

Date:

Signature:

Signed by Wiltshire Bridleways Association

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) Wiltshire Bridleways Association (WBA).
- 1.2.2 Collectively, Lime Down Solar Park Limited and WBA 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 9 January 2026. A summary of the meetings and correspondence that has taken place between the Applicant and Wiltshire Bridleways Association is outlined in Table 2-1.

Table 2-1 Summary of engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
9 January 2026	Relevant representation	The Wiltshire Bridleways Association submitted a relevant representation to the Planning Inspectorate.
6 March 2026	Phone call and email	Introductory phone call and follow up email to discuss the approach to the preparation of the Statement of Common Ground.
17 April 2026	Email	Email from Wiltshire Bridleway Association to confirm the main contact for the SoCG
20 April 2026	Phone call	Phone call to discuss proposed deadline for SoCG
22 April 2026	Email	Follow up email from Wiltshire Bridleway Association to confirm alternative date for the comments on the SoCG
02 May 2026	Email	Email from Wiltshire Bridleway Association to request a meeting to discuss the SoCG
22 May 2026	Email	Email from Wiltshire Bridleway Association to provide comments on the initial draft SoCG.
5 June 2026	Email	Email from the Applicant to Wiltshire Bridleway Association to confirm submission of the first revision of the SoCG and invite further discussion.

23 June 2026	Email	Follow up email from Applicant requesting input into the SoCG.
2 July 2026	Email	Email from Wiltshire Bridleway Association to provide comments on the revised draft SoCG.
4 August 2026	Email	Applicant shared the SoCG submitted at Deadline 4 and requested a review and update on its position, where appropriate.
13 August 2026	Email	WBA provided comments on the SoCG for inclusion in the updated SoCG for Deadline 6.
17 August 2026	Email	Applicant responded to a specific query from WBA regarding how the scheme would be managed if the developer became insolvent or the project proved to be unprofitable/obsolete.

3 Matters Raised

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

3.1 Socio-Economic Tourism Recreation

Table 3-1 Socio-Economic Tourism Recreation

Reference	Sub-topic	WBA Position	Applicant's Position	Status
3.1.1	Legislation and Policy	No Comment	The Applicant considers that ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240] has identified and appropriately considered all applicable legislation and policy.	Agreed
3.1.2	Methodology	No Comment	The methodology adopted within ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
			and studies and is considered acceptable.	
3.1.3	Baseline	No Comment	The baseline conditions which are detailed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240] are representative of the baseline site conditions.	Agreed
3.1.4	Assessment results - impact on Bridleways within and bordering the application area during construction and operation	The size of this project dictates that there will be a large number of heavy vehicle movements over a 2 year period. This will not encourage the leisure rider or walker and will significantly detract from their enjoyment of the landscape. The WBA accepts that the traffic management plan seeks to minimize the disruption, by confining vehicle movements to the middle of the day on week days. It also seeks to facilitate maximum safety for all vulnerable PROW users.	The Applicant considers that ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240] have sufficiently assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on all public rights of way, unsurfaced highways, the local	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
			highway network, and any permissive routes made known to the Applicant. Equestrian facilities including both private facilities and business have also been individually assessed. Residual significant adverse effects are only assessed as likely to occur during construction, to bridleway MALW54, the unsurfaced roads in Rodbourne used to access Lime Down E, and the equestrian facilities at Park Farm, Yatton Keynell. Mitigation measures to protect all PROW users are set out in the Outline Construction Traffic Management Plan (CTMP) [REP1-112] and Outline Public Rights of Way and Permissive Paths Management Plan (PRoWPPMP) [REP1-104], secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007].	
3.1.5	Assessment results - impact on PROWs outside of the application area during	WBA accepts that using a traffic management plan all users of the roads and PROWs will be accommodated as safely as possible within the needs of the project.	The assessment in ES Volume 1, Chapter 16 Socio-Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3, Appendix 16 2: Tourism and Recreation Receptor Tables [APP-	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
	construction and operation		241] have assessed the likely impacts of the Scheme on a 2 km Zone of Influence surrounding the Scheme, which extends to a 5 km Zone of Influence for regionally or nationally important tourism and recreation receptors.	
3.1.6	Mitigation - Construction Traffic	WBA accepts that using a traffic management plan all users of the roads and PROWs will be accommodated as safely as possible within the needs of the project.	Mitigation measures to protect all PROW users, and recreational users of the public highway network are set out in the Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104] , secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007] .	Agreed
3.1.7	Mitigation - Closure of Rights of Way	WBA accepts that the only existing bridleway to be closed during the construction phase will be MALW54.	Mitigation measures to protect all PROW users, and recreational users of the public highway network are set out in the Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104] , secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007] . Closures of PRoW are to be avoided where possible. Diversions lasting the full construction period are proposed	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
			only for bridleway MALW54, footpath MALW55, and footpath GRIT20.	
3.1.8	Mitigation - Surface and Cable Management	Without the below mitigation measures WBA objects to all parts of the development. - Trenches should not cross rights of way; if necessary, obtain Highway Authority authorization. - Reinstatement of surfaces must be firm and safe for horse use within a short timeframe. - Buried cables near equestrian routes should be deeper than 300mm to avoid electrical hazards. WBA have reviewed the Applicant's position and confirm they agree on the proviso that human and equine safety remain paramount.	Mitigation measures to protect all PROW users, and recreational users of the public highway network are set out in the Outline CTMP [REP1-112] and Outline PROWPPMP [REP1-104], secured respectively by Requirements 15 and 16 in Schedule 2 to the Draft DCO [REP1-007]. Cable trenches are proposed to cross PROWs, with the exception of locations where the Applicant has specifically committed to a trenchless technique (usually associated with major roads or watercourse crossings). Detail design of cable trenching will be submitted to Wiltshire Council (including in their role as highway authority) for approval. Cable trench sizes and depth are set out in the Design Principles and Parameters [REP1A-008], secured by Requirement 5 in Schedule 2 to the Draft DCO [REP1-007].	Agreed
3.1.9	Mitigation - Noise Mitigation	From the information and assurances that have been provided WBA	Noise and vibration impacts arising from construction activities are	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
		understands that the noise levels from the panels and the inverters will not exceed that of a domestic washing machine and in most cases will be less than the road noise of the M4.	assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] . Relevant mitigation measures are set out in the Outline Construction Environmental Management Plan (CEMP) [REP1-096] , secured by Requirement 13 in Schedule 2 to the Draft DCO [REP1-007] . The Outline Operational Environmental Management Plan (OEMP) [REP1-098] commits to noise levels from the Scheme being the same as or below those presented in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] and ES Volume 3, Appendix 14-4: Noise Modelling [REP1-061] . This is secured by Requirement 14 in Schedule 2 to the Draft DCO [REP1-007] .	
3.1.10	Mitigation - Drainage	Without the below mitigation measures WBA objects to all parts of the development. Assess and provide adequate drainage for altered surfaces to prevent flooding.	The assessment in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] demonstrates that existing drainage patterns would be maintained and that the Scheme would not result in significantly changed runoff or	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
		- Consider effects beyond site boundaries; avoid hard surfacing unless necessary. - Preserve existing surfaces where possible; upgrade only if suitable for horses. WBA remains concerned as to the effect of the construction traffic on the surface quality of the byways in the area and the effect of the change in land use will have on the same. Updated position WBA now agree - WBA understands from conversations with project members that the land drainage will neither be improved or made worse by the Lime Down project.	inadequate drainage that could affect equestrian routes. Relevant mitigation measures are set out in the Outline CEMP [REP1-096], secured by Requirement 13 in Schedule 2 to the Draft DCO [REP1-007]. The Applicant furthermore has committed to ensuring any construction alterations or damage to PROWs are remediated following construction works being completed. The Applicant also commits to maintaining the surface condition of PROWs on the Scheme throughout the operational lifetime of the Scheme. This is secured through the Outline PRoWPPMP [REP1-104], by Requirement 16 in Schedule 2 to the Draft DCO [REP1-007].	
3.1.11	Mitigation - Fencing	The WBA would like the minimum path width to follow British Horse Society guidance at 3 metres and for fencing to be of vegetation rather than corrugated metal which would make the paths feel narrower.	A minimum surface width of 3 m is proposed for bridleways, as recommended by guidance from the British Horse Society. However, only groundcover planting will be planted immediately alongside PROWs, allowing users to pass at a greater	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
		Updated position WBA accepts that a 3m width for bridleways is inline with BHS recommendations and will be sufficient.	width if required. Where new hedgerow planting is proposed alongside PROWs, this will be planted to maintain a suitable passable width that is to be determined at the detailed design stage. This is shown indicatively on ES Volume 2, Figures 3-4-1 to 3-4 5.2: Landscape and Ecology Mitigation Plan [REP-029 to REP1-032]. The majority of site fencing is to consist of 2 m deer stock fencing (i.e. wooden posts with wire mesh) set a minimum of 15 m from the centreline of the nearest PROW. Metal palisade fencing is only proposed in locations where there is a danger to life, and so is limited to substation and BESS enclosures. Palisade fencing is not proposed adjacent to PROWs. These principles (including offsets to PROWs, PROW widths, and fencing and PV types), are set out in the Design Principles and Parameters [REP1A-008] and indicatively shown on the ES Volume 2, Figures 3-4-1 to 3-4 5.2: Landscape and Ecology	

Reference	Sub-topic	WBA Position	Applicant's Position	Status
			Mitigation Plan [REP-029 to REP1-032] All details of the Scheme are subject to the relevant Requirements in Schedule 2 the Draft DCO [REP1-007].	
3.1.12	Mitigation - Security	Without the below mitigation measures WBA objects to all parts of the development. • Anti-vehicle barriers allowed only for livestock or user safety, not for theft prevention. • Permissive paths should follow BHS guidance on vehicle barriers.	PROWs are not proposed to be located within 'secure' areas and so are only to be controlled where there is potential for livestock to be present on adjacent land. This is demonstrated on the ES Volume 2, Figures 3-4-1 to 3-4 5.2: Landscape and Ecology Mitigation Plan [REP-029 to REP1-032] and secured in principle by the Design Principles and Parameters [REP1A-008]. Both of these documents are subject to detailed design being approved as secured through Requirements 5 and 7 of Schedule 2 to the Draft DCO [REP1-007] Treatment of specific gaps, and barriers on PRow are under discussion with Wiltshire Council and are to be discussed and agreed through a SoCG.	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
3.1.13	Mitigation - Alternative or Additional Access	The WBA acknowledges that the applicant has linked some bridleways which will enhance the existing possibilities for off highway hacking. Specifically, the path in Lime Down A linking SHER14 with SHER16: the path linking SHER35 to the Fosse Way; and LUCK 57 at Cream Gorse to the highway at Alderton Church. Also the permitted path linking MALW59 to MALW61 and MALW63 to SSTQ4. WBA are disappointed that a permitted path east from MALW61 to SEAG23 and GSOM9 in Seagry Wood is not possible due to a 50 metre gap between the end of the project and the existing bridleway. WBA will enquire further regarding opportunities here with the owner of Seagry Wood and Paul Millard at Wiltshire Council. WBA are also disappointed that the permitted path through Lime Down B is to be for pedestrians only, WBA understand that this is due to current incidences of anti social behaviour	The Applicant has committed to providing permissive paths as part of the Scheme on the Solar PV Sites. These include paths for pedestrians where linking public footpaths, and for equestrians and cyclists where linking bridleways. These are designated as Work No. 10 on the Works Plan [REP1-005] and shown as on ES Volume 2, Figures 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plan [REP-029 to REP1-032], with the various measures for developing these secured through the Outline Landscape and Ecological Management Plan (LEMP) [APP-283], and the Outline PRowPPMP [REP1-104], under Requirement 7 and 16 of Schedule 2 to the Draft DCO [REP1-007]. The Applicant confirms (in response to these specific comments raised) this includes: permissive bridle routes in Lime Down A between SHER14/Foxley-Sherston Road and two points on SHER16, both a permissive path and permissive bridle route in Lime Down E connecting	Under Discussion

Reference	Sub-topic	WBA Position	Applicant's Position	Status
		involving motorbikes but would like the Applicant to find ways of allowing bicycle and equestrian use of this path.	MALW59 to MALW61, and to MALW63 (SSTQ4) respectively, and permissive bridle routes connecting SHER35 to the Fosse Way and connecting LUCK57 at Cream Gorse to the public highway near Alderton Church through Lime Down C. The Applicant confirms that as SEAG23/GSOM9 fall outside the Order Limits and within the land of a separate landowner, means of connecting this route to MALW61 have not been able to be explored further. The Applicant has however committed to allowing space for future network improvements (such as potentially between Seagry Wood and Rodbourne Bottom) to come forward at a later date, The Applicant is only able to commit to a permissive path for pedestrians on Lime Down B. This is due to the route intersecting a public footpath (NORT10), and to previous instances of anti-social behaviour both on the Site at Lime Down B and nearby land under the same ownership. This involved trespassing by motorcyclists	

Reference	Sub-topic	WBA Position	Applicant's Position	Status
			and 4x4 drivers. As a result, police and political involvement was required to stop reoccurrences. On this basis, provision of additional access onto this permissive route for cyclists and equestrians has not been able to be agreed. The Applicant has worked with Wiltshire Council's PRow and Countryside Access Team to generate permissive path links and explore means by which PRow infrastructure within the Order Limits can be repaired or improved. The latter are likely to be agreed at detailed design following development consent. The Applicant is also committed to providing a Community Benefit Fund for offsite works.	
3.1.14	Mitigation - Visual Screening	Without the below mitigation measures WBA objects to all parts of the development. Account for equestrian height (approx. 11 ft) when assessing visual impact.	The assessment in ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060] has been undertaken in accordance with the methodology set out in GLVIA3, which sets out an assumed observer height of 1.5-1.7 m based on the	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
		Plant larger or semi-mature trees for effective screening. WBA is still concerned that the change in land use will be to the detriment of walkers, cyclists, equestrians and tourists experience of the area so the quality of the visual screening will be of paramount importance. Updated position WBA accepts the plans in place on the project to protect the visual impact on the landscape as much as possible	average height of a person. Whilst it is recognised mounted equestrians will be higher, this does not represent the majority of PROW users. The assessment in ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [APP-060] assess Year 1 and Year 15 impacts. Planting of larger or semi-mature trees and hedges are proposed only where instant screening is deemed necessary.	
3.1.15	Policy / Mitigation - Planning Compliance	The WBA accepts that mitigation measures comply with UK law.	The Applicant considers that ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240] has identified and appropriately considered all applicable legislation and policy.	Agreed

Reference	Sub-topic	WBA Position	Applicant's Position	Status
3.1.16	Mitigation - Specific Proposed Bridleway Upgrades	In line with matter 3.1.13 above, WBA welcomes the proposed bridleway links, which will improve off-highway riding opportunities, including connections between SHER14 and SHER16, SHER35 and the Fosse Way, LUCK57 and Alderton Church, MALW59 and MALW61, and MALW63 and SSTQ4. However, WBA is disappointed that a link between MALW61 and the existing bridleways SEAG23 and GSOM9 in Seagry Wood cannot be provided due to a five-metre gap. WBA will explore potential opportunities with the landowner and Wiltshire Council. WBA is also concerned that the proposed permitted path through Lime Down B is restricted to pedestrians. While recognising concerns regarding anti-social motorbike use, WBA encourages the applicant to consider measures that would allow access for cyclists and equestrians.	The Applicant has committed to providing permissive paths as part of the Scheme on the Solar PV Sites. These include paths for pedestrians where linking public footpaths, and for equestrians and cyclists where linking bridleways. These are designated as Work No. 10 on the Works Plan [REP1-005] and shown as on ES Volume 2, Figures 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plan [REP-029 to REP1-032], with the various measures for developing these secured through the Outline LEMP [APP-283], and the Outline PROWPPMP [REP-104] under Requirements 7 and 16 of Schedule 2 to the Draft DCO [REP1-007]. Some of the routes requested by WBA have been considered but ultimately not included due to location specific constraints or matters of land ownership (see 3.1.13) that cannot be addressed through the Development Consent Order.	Under Discussion

Reference	Sub-topic	WBA Position	Applicant's Position	Status
3.1.17	Decommissioning	WBA accepts that the applicant plans to decommission the solar array in line with best practise at the end of the 60 year term. However are there any contingencies in place for decommissioning should the applicant fall into financial difficulties or that the technology becomes unprofitable/obsolete before the end of the term?	Sections 160 and 161 of the Planning Act 2008 make it an offence to breach the terms of a DCO. In the event the Applicant became insolvent, this would also constitute a breach of the terms of the DCO, and therefore an offence under section 161 of the Planning Act 2008. The enforcement process would then be followed, with the relevant planning authority issuing a notice under section 169 requiring steps be taken to decommission the Scheme. The landowner could choose to comply with the notice and recover its costs from the Applicant under s170(2) or, if the Applicant was insolvent, via the security put in place under the terms of the lease. If this notice was not complied with, the relevant planning authority would then arrange for decommissioning to be carried out under section 170. The relevant planning authority would then exercise its statutory right to recover its full costs from the landowner under section 170(1)(b). In circumstance where the Applicant was insolvent, the	Under Discussion

Reference	Sub-topic	WBA Position	Applicant's Position	Status
			landowner would recover the costs under the security put in place pursuant to the terms of the lease, with the same effect as if the landowner had recovered the costs from the Applicant directly under section 170(2).	