

Lime Down Solar Park Development Consent Order (EN010168)

Unique Reference Number: [REDACTED]

Below are my comments on the Equine Business Report submitted by the Applicant at Deadline 5

Whilst the Applicants Equine Business Report describes in more detail the baseline and potential impact pathways it fails to convert those findings into appropriate conclusions.

Whilst I continue to disagree with the Applicant's conclusions, the report at least now recognises a far more extensive and sensitive equine receiving environment than was identified in the original Environmental Statement. It now acknowledges commercial breeding enterprises, specialist supporting businesses, the importance of client confidence and business viability, and the wider economic significance of the local equine sector. But my principal concern is that this substantially expanded baseline has resulted in remarkably little change to the Applicant's conclusions.

Therefore, if the baseline has changed so significantly, why haven't the conclusions?

The report still describes the original methodology in the ES as “robust and sufficient” despite requiring a 72-page Equine Business Report halfway through the Examination.

Our local roads are not simply access routes to PRowS. As we have identified these are training routes, conditioning routes, rehabilitation routes and everyday infrastructure for such a heavily equestrian landscape yet the applicant still appears to treat these simply as transport corridors.

Who, within the applicant's report reaches these conclusions? Veterinary opinion and economic/business conclusions are different disciplines.

The Applicant places considerable reliance on horses habituating to disturbance. In my experience operating a commercial Thoroughbred breeding enterprise, this does not reflect the continual turnover of mares, foals, yearlings and boarded horses, many of which arrive with no previous exposure to this environment.

I have already raised concerns at Deadline 4 over the transparency of IGP's questionnaire as to who received the questionnaires, who replied, why anonymised results haven't been disclosed and how their conclusions were reached.

The applicant repeatedly relies on 15m - 30m as a generic flight zone yet the applicant themselves describes West Park Farm and Ladyswood Stud as amongst the most sensitive receptors. Why therefore wasn't a genuinely site specific assessment undertaken?

Overall, whilst the Applicant has undertaken considerably more work than in the original Environmental Statement, we remain concerned that the assessment framework is fundamentally incomplete. The report continues to assess equestrian businesses primarily through visual amenity, traffic and Public Rights of Way rather than considering how commercial equine businesses, particularly Thoroughbred breeding enterprises, operate and what determines their viability.

In my opinion, the Applicant has not identified all of the relevant impact pathways raised throughout our Relevant Representations, Written Representations and Oral Submissions. Whilst some impacts are acknowledged, many are either omitted entirely or recognised only briefly before being dismissed without any meaningful site-specific evidence.

Table 2 – Assessment of Impact Pathways

I do not consider that the Applicant has identified all relevant construction or operational impacts affecting commercial equine businesses.

Insufficient consideration has been given to:

- Client confidence and reputational damage
- Commercial viability and long-term business resilience
- Bloodstock insurance and insurability
- Disruption to breeding, foaling and sales preparation
- The continual arrival of new mares, foals, yearlings and boarded horses which have not previously habituated to the environment
- Staff, vet and handler safety during routine and emergency husbandry procedures
- Cumulative impacts arising from construction and subsequent operation
- The combined welfare and commercial consequences of these impacts.

Many of these issues have been consistently raised throughout the Examination but remain inadequately assessed.

Acoustic fencing / indoor facilities / alternative turnout

I do not consider these to represent realistic mitigation for a commercial Thoroughbred stud.

Stud farms cannot simply relocate mares and foals or permanently alter turnout and management practices without significant welfare, operational and commercial implications. These measures also transfer additional costs and management burdens onto our business rather than mitigating the source of the impact.

The issue is also not simply whether horses are "more sensitive". The principal concern is commercial confidence. Owners of high-value bloodstock choose where to keep their horses based upon confidence in the environment, management and welfare standards. Loss of confidence may lead to horses being relocated irrespective of whether any physical incident has yet occurred.

The Applicant's original assessment concluded that significant operational noise effects would not occur, yet this report now proposes acoustic fencing as potential mitigation.

If operational noise is not anticipated to increase, it raises questions as to why acoustic fencing is now considered necessary."

Physiological responses

██████████ veterinary review addresses these issues in detail.

In summary, our concern is not whether horses are capable of habituation in general, but that the Applicant relies too heavily upon this general proposition to justify conclusions of low residual risk without adequately considering the characteristics of our commercial Thoroughbred stud. The veterinary report also highlights that behavioural habituation should not be assumed to equate to physiological adaptation or the absence of welfare and commercial consequences.

Construction mitigation

Whilst improved communication and engagement are welcome, many of the proposed mitigation measures do not actually remove or even reduce the impacts identified. Instead, they rely upon our business adapting operations around the applicant's construction programme.

Similarly, the appointment of an equestrian representative to a Community Liaison Group may improve communication but would not itself mitigate noise, traffic, vibration, moving machinery or the practical difficulties faced by commercial equine businesses.

Much of the mitigation proposed throughout the report appears to depend upon future liaison, communication, advance warning or businesses adapting their own operations around the construction programme. That is not the same as demonstrating that impacts have been avoided.

Measures described as being implemented "where practicable" or developed through future management plans provide limited reassurance to businesses that now stand acknowledged as amongst the most sensitive receptors within the study area.

Construction impacts on business viability

I disagree with the suggestion that impacts are unlikely to affect viability simply because construction is temporary.

Commercial Thoroughbred businesses operate around fixed biological and commercial cycles which cannot simply be rescheduled. Temporary disruption during foaling, breeding, veterinary treatment or sales preparation may have permanent commercial consequences.

Likewise, business decisions are frequently made in anticipation of perceived future risks. Loss of client confidence, reduced investment and relocation of horses may occur well before construction has commenced and may not be reversed once construction has finished.

Referring to these impacts as "short-term disruption" fundamentally misunderstands the nature of a commercial Thoroughbred breeding enterprise. Temporary disruption during critical periods such as breeding, foaling, veterinary treatment or yearling preparation may have permanent welfare and commercial consequences. This terminology therefore reinforces our concern that the Applicant continues to underestimate the practical realities of operating an internationally connected breeding business immediately adjacent to the Scheme.

Operational phase

I remain unconvinced that the Applicant has demonstrated that the operational phase would not significantly affect adjacent commercial Thoroughbred breeding enterprises.

The Applicant places considerable reliance upon landscape buffers and screening yet provides little consideration of the 15 year establishment period before these measures may become effective. In practice, meaningful screening may take many years to develop, during which the operational infrastructure will remain largely exposed.

In addition, the Applicant continues to conclude that the slow movement of tracker panels is unlikely to result in significant effects, despite providing little or no equine-specific empirical evidence to support this conclusion. There remains no convincing real-world evidence demonstrating that commercial Thoroughbred breeding enterprises can successfully operate immediately adjacent to extensive 4.5m high moving solar arrays.

Similarly, insufficient consideration has been given to operational noise sources, including tracker motors, maintenance activities and wind interaction with panels. Evidence presented from Cleve Hill demonstrates that operational noise from solar infrastructure is capable of generating concern, even with smaller panels than those proposed at Lime Down. The Applicant has not adequately demonstrated why similar issues would not arise here.

Temporary impacts can have permanent consequences

The Applicant repeatedly refers to construction effects as "temporary" or "short-term disruption".

In my opinion this fundamentally misunderstands the way commercial Thoroughbred breeding businesses operate. Breeding, foaling, veterinary procedures, yearling preparation and sales programmes all occur within fixed biological and commercial windows.

Temporary disruption during those periods may have permanent welfare and commercial consequences. Similarly, business decisions are often made in anticipation of future risk rather than after an incident has occurred.

Clients do not necessarily wait until a horse has been injured before deciding to relocate valuable bloodstock. Loss of confidence, reduced investment and relocation of horses may occur long before construction begins and may not be reversed when construction eventually finishes.

General observations

Throughout the report there is a tendency to acknowledge potential impacts before concluding that significant effects are unlikely without adequately demonstrating why that conclusion is justified for the businesses concerned.

I also remain concerned regarding the transparency of the consultation methodology. It remains unclear precisely which equine businesses received questionnaires, how they were selected, how many responses were received, and the extent to which the conclusions

presented are supported by the available evidence. We are continuing to review this and hope to provide further comments separately.

Throughout the report, the Applicant frequently assesses whether horses may eventually habituate to the proposed environment. However, this is not the same question as whether a professional breeding enterprise can continue to recommend that environment to its clients with confidence. Business viability depends upon maintaining both welfare standards and professional confidence. The report does not adequately bridge that gap.

Examples of local impacted equestrian businesses/properties which have not received the Applicants Questionnaire:

The lack of inclusion of local businesses is evident from the map of equestrian properties and businesses submitted at Deadline 4 alongside the Equine setting report. It is very difficult to understand the methodology the applicant has used to identify the recipients of this questionnaire. A few initial examples of affected equine businesses not included who are existing IP's include:

Andrew Privas – Existing IP who [REDACTED] spoke to himself during the Accompanied Site Visit about the Questionnaire never received a copy. He is a local farrier whose business will be heavily impacted.

[REDACTED] – Existing IP with a busy local livery yard in Luckington who did not receive the Questionnaire.

Grant Barnes and Son - long established saddlers based in the centre of Malmesbury and heavily used by local equine businesses. The applicant appears to have included a saddler near to Melksham yet fail to include this very locally based and much more likely affected business.

Very few properties marked on the map submitted at Deadline 4 have received this Questionnaire. It appears businesses along the cable route (as opposed to sites) have been included who are less likely to be aware of the scale and impact. Perhaps it would be useful for the Applicant to plot the businesses which received their questionnaire on a map similar to the one submitted at Deadline 4.

Applicant: “For an equestrian business to become economically unviable during the construction phase, there would need to be a sustained reduction in demand from both existing and prospective clients. This could potentially arise where construction-related activities influence customer perceptions, reduce the attractiveness of facilities or otherwise discourage participation in equestrian activities over a prolonged period.”

As professionals entrusted with the care and management of high-value Thoroughbreds, our primary responsibility is to provide an environment that we believe is safe, suitable and conducive to the welfare and performance of the horses in our care. Our clients rely upon our professional judgement when deciding where to place valuable broodmares, foals and youngstock. The issue is therefore not simply one of client perception or confidence in our business, it is also our own professional confidence that we are able to continue providing the standard of environment and care that we have promised. If we are no longer confident that this can be achieved because of the proximity and duration of major construction works, it

would inevitably influence both our business decisions and those of our clients. The Applicant significantly underestimates the importance of this professional judgement and its direct relationship to business viability.

Appendix:

1. Vet report on Equine Business Report – [REDACTED]
2. Letter from Andrew Privas

VETERINARY RESPONSE TO THE EQUINE BUSINESS REPORT (EXAM/9.62)

Lime Down Solar Project

Prepared by

BA (Mod) Biochemistry, Graduate Diploma in Business Studies (DBS), MVB, Graduate Certificate in Equine Sports Medicine (UCD)

Professional Background and Basis of Opinion

I qualified as a veterinary surgeon in 2009 and have worked exclusively in Thoroughbred veterinary practice since qualification. For the past 11 years, I have worked exclusively within a large, commercial, industry-leading Thoroughbred stud farm.

My professional experience includes the day-to-day veterinary management of Thoroughbred broodmares, foals, weanlings and yearlings, including reproductive and neonatal medicine, nutrition, routine and emergency veterinary procedures, youngstock management, and the behavioural and practical considerations associated with handling Thoroughbreds within a commercial stud-farm environment.

My qualifications are BA (Mod) Biochemistry, Graduate Diploma in Business Studies (DBS), MVB and Graduate Certificate in Equine Sports Medicine (UCD).

I have reviewed the Equine Business Report (EXAM/9.62) from the perspective of my professional veterinary experience within the Thoroughbred breeding industry and with reference to the scientific literature relevant to equine behaviour, physiology, nutrition and welfare.

Summary of Veterinary Concerns

The report does not need to be challenged on the general proposition that horses can habituate. The central concern is that this general biological capacity is relied upon too heavily to support conclusions of low residual risk in a continuously exposed population of high-value Thoroughbred broodmares, foals, yearlings and newly arriving bloodstock. Population-level habituation does not establish safe adaptation in every individual, does not prevent catastrophic injury during early exposure, and does not address physiological or commercial consequences where normal behaviour such as foraging is materially altered.

1. Habituation evidence is over-extrapolated

Report weakness

The report relies heavily on rapid habituation to justify low residual risk. However, Janicka et al. (2024) studied only 20 Warmblood horses used for hippotherapy and recreational riding, exposed repeatedly to selected recorded sounds under controlled conditions. The paper describes habituation to a "specific stimulus", reports marked individual variation in the number of exposures required, and found renewed vigilance, locomotion and heart-rate responses to novel sounds. A population selected and managed for therapy/recreational work is not a representative population of Thoroughbred broodmares, foals and yearlings, and repeated playback of a defined sound is not equivalent to an evolving construction site.

Veterinary objection

Construction presents changing and combined stimuli - machinery, HGVs, people, reversing alarms, impact noise, visual movement, vibration and activity from different positions. Habituation to one stimulus cannot safely be assumed to generalise to the next. Repetition may also reinforce an adverse association after a sufficiently frightening event rather than progressively improve the response.

Evidence

Evidence: Janicka et al. 2024, Journal of Veterinary Behavior 74:11-18. The authors conclude: "Horses distinguish familiar sounds from novel sounds." Recent young-Thoroughbred work also found substantial individual and environmental-context effects (Klitzing et al., 2025).

2. Individual Thoroughbred reactivity and the catastrophic-outlier problem

Report weakness

The assessment relies too heavily on the response of the "average horse". In stud practice there is a wide spectrum of neuro-/sensory reactivity: some horses are exceptionally sensitive to sound, touch, confinement, handling or unexpected movement. Thoroughbred-specific studies support meaningful individual variation in behavioural traits, and genetic work supports a biological contribution to temperament.

Veterinary objection

For this risk, the outlier matters. It takes only one unpredictable startle response for a yearling to run through a fence, collide with a gate or handler, escape, or sustain a catastrophic limb injury. Eventual habituation is irrelevant to an animal catastrophically injured during its first exposure. The assessment must therefore consider severity as well as probability.

Evidence

Evidence: Powell et al. (2023) state that an inappropriate startle response can "cause serious injury to the animal or human handlers." Yokomori et al. (2024) identified genetic associations with personality traits in 169 Thoroughbreds. Klitzing et al. (2025) concluded that "it is important to consider the individual behavior of each horse."

3. Youngstock, maternal families and newly arriving horses remain vulnerable

Report weakness

The report's reliance on neuroplasticity in young horses does not establish that foals and yearlings are at no greater practical risk. Youngstock are naive and may react intensely before learning occurs. West Park also has a continuously changing bloodstock population, so newly arriving animals will repeatedly enter without prior habituation.

Veterinary objection

Long-term stud experience is additionally relevant expert evidence: temperament and reactivity can recur strongly within maternal families. Similar characteristics may remain apparent even in foals subsequently reared by foster mares. This clinical observation should be distinguished from the published evidence, but it is consistent with modern evidence of a genetic contribution to Thoroughbred temperament.

Evidence

Evidence: Yokomori et al. (2024), Thoroughbred personality/genetic associations; Powell et al. (2023), measurable individual startle phenotypes in weanlings; Klitzing et al. (2025), individual and environmental effects in young Thoroughbreds.

4. Reduced foraging: broodmare nutrition, colostrum, foal growth and commercial consequences

Report weakness

The report underweights reduced foraging as though it were principally a transient behavioural response. In the 2026 experimental traffic-noise study, median foraging fell from 81% at baseline to 41% during initial noise exposure, while vigilance and heart rate increased; avoidance and physiological arousal persisted despite partial behavioural habituation.

Veterinary objection

On a Thoroughbred stud, a substantial or recurrent reduction in normal feeding has potentially serious downstream consequences. Late-pregnant and lactating mares have high nutritional requirements; inadequate intake can compromise maintenance of optimal body condition and nutrient

supply. Maternal nutrition is relevant to colostrum quality, including vitamin E status and colostral immunoglobulin concentrations, while adequate colostrum is essential to passive transfer in the foal. Reduced intake also raises concerns for milk production, foal growth, youngstock condition, veterinary intervention and eventual sales value and athletic potential. The report should therefore assess the complete biological and commercial pathway rather than treating reduced foraging as a minor behavioural effect.

Evidence

Henke-von der Malsburg & König von Borstel (2026) reported a fall in median foraging from 81% to 41% during initial noise exposure. Bondo & Jensen (2011) reported that late-gestation vitamin E supplementation increased alpha-tocopherol in mare milk and affected milk IgG/IgM concentrations. Thoroughbred growth literature demonstrates the commercial and developmental importance of appropriate foal and youngstock growth. This evidence supports a credible risk pathway; it does not prove that this Scheme will necessarily cause failure of passive transfer.

5. Maiden mares and low-birthweight foals are a relevant vulnerable subgroup

Report weakness

The report does not meaningfully consider mare/foal units with less biological margin for additional nutritional or physiological disturbance. This is particularly relevant to maiden/primiparous Thoroughbred mares. Thoroughbred data show that parity is positively associated with foal birthweight, meaning first-parity mares tend to produce lighter foals.

Veterinary objection

The consequences of imposing an additional environmental/nutritional stressor on an already lower-birthweight subgroup are not established and should not be invented; that uncertainty is itself relevant. The appropriate question is whether the Applicant has assessed potentially vulnerable mare/foal subgroups rather than assuming a uniform response across the breeding population.

Evidence

Evidence: Elliott, Morton & Chopin (2009), 348 Thoroughbred foals: parity was positively associated with birthweight. Pagan et al. (2023), 3,062 Thoroughbred foals across Kentucky, the UK and Australia, also evaluated parity as a major determinant of birthweight. Wilsher & Allen (2006) found that an infection-mediated nutritional insult with transient maternal weight loss in primiparous Thoroughbred fillies was associated with placental changes and reduced foal birthweight.

6. Behavioural habituation must not be confused with physiological adaptation

Report weakness

The report is predominantly behavioural: if overt reaction reduces, risk is treated as diminishing. That is not necessarily physiologically valid. Recent experimental evidence found persistent heart-rate elevation and spatial avoidance despite partial behavioural habituation to environmental noise.

Veterinary objection

This opens a broader veterinary question that the report does not adequately address: chronic or recurrent physiological arousal, appetite/foraging disruption, gastrointestinal health, maintenance of body condition, reproductive/lactational demands and growth. A horse looking calmer does not prove that the biological effect has disappeared.

Evidence

Evidence: Henke-von der Malsburg & König von Borstel (2026) found persistent physiological arousal despite partial behavioural habituation. Claims about cortisol should be made only where directly supported; the current evidence is stronger for autonomic arousal than for asserting a particular cortisol response to this Scheme.

7. Gastric-health consequences of reduced forage/stress warrant consideration

Report weakness

Thoroughbreds are a population in which equine gastric ulcer disease is clinically important. The strongest argument is not a simplistic stress-cortisol-ulcer chain, but the interaction of altered normal feeding behaviour with gastric physiology. Horses are adapted to frequent forage intake; prolonged or recurrent reductions in forage alter salivary buffering and increase acid exposure of the squamous stomach.

Veterinary objection

Accordingly, where environmental noise has experimentally produced a large reduction in foraging, gastric health is a legitimate physiological endpoint for a Thoroughbred-specific assessment. Any assertion that this particular construction will cause ulcers would be too strong; the weakness is that the pathway is not adequately considered.

Evidence

Evidence: established EGUS literature identifies feeding management, periods without forage and high-concentrate/low-forage management among important risk factors. The 2026 noise study provides the missing behavioural link by directly demonstrating reduced foraging during noise exposure.

8. The 30 m flight-zone argument is not a validated construction safety threshold

Report weakness

The report appears to convert a handling concept - the horse's flight zone - into a general prediction that construction movement beyond about 30 m will not elicit a material response. A flight zone is not an acoustic, vibration or visual detection threshold.

Veterinary objection

Horses can perceive and react to noise, machinery, flashing lights and movement far beyond a handling flight distance. No cited evidence validates 30 m as a safe construction separation for Thoroughbreds, particularly when parts of West Park are recorded at 0 m and 50 m from works.

Evidence

Evidence: the 2026 traffic-noise study demonstrated equine behavioural and physiological effects at exposures modelled over distances far beyond 30 m. It does not establish a construction threshold; it demonstrates why a 30 m handling concept cannot serve as one.

9. Safe handling concerns apply to vets and stud staff, not only farriers

Report weakness

The report recognises the need for calm conditions during farriery but does not adequately extend the same risk analysis to veterinary procedures, routine stud work and even very simple close handling of horses in fields or paddocks.

Veterinary objection

The risk is not confined to formal procedures. Stud staff and veterinarians routinely have to enter a horse's immediate personal space to fit or adjust a headcollar, attach a lead rope, check a limb or wound, take a temperature, administer medication, examine a foal, scan a mare, give an injection, take blood, apply a bandage or simply catch and move a horse. At those moments the handler may be beside the head, shoulder or hindquarters with limited ability to evade a sudden movement. An unexpected construction noise, movement or vibration at precisely the wrong moment can produce a rapid startle, spin, strike, kick or collision and expose the handler to serious injury. This is especially relevant when horses are loose at pasture and cannot be managed within a controlled clinical environment. Advance warning cannot eliminate this risk because many routine interactions are unavoidable and emergencies are inherently unpredictable.

Evidence

Powell et al. (2023) expressly notes that an inappropriately expressed equine startle response can cause serious injury to the animal or human handlers. The relevance therefore extends beyond farriery to all close-contact husbandry, veterinary and handling activities carried out within the stud environment.

10. Mitigation is uncertain and transfers burden to the stud

Report weakness

The proposed controls rely heavily on advance warning, altered routines, increased staff vigilance and wording such as "where practicable". The report should distinguish mandatory secured controls from measures that may not occur when inconvenient or impracticable.

Veterinary objection

It should also specify equine-awareness training for all relevant contractors, subcontractors, plant operators and delivery drivers; prohibited behaviours; supervision; and whether the stud can require work to stop before a high-risk procedure or horse movement. Additional supervision, altered turnout, horse relocation and rescheduling are themselves costs and operational impacts.

Evidence

This is principally a risk-management and business-impact objection, supported by the startle/safety literature rather than by a specific construction-worker study.

11. The other solar/equestrian case studies are not comparable with an adjacent Thoroughbred stud

Report weakness

The report relies on Sunnica, Membury, Lower Thames Crossing and Wallaroo as contextual reassurance. Those examples are not equivalent in exposure or receptor type. Lower Thames Crossing concerned a riding school where lesson times could be altered; Wallaroo concerned a riding centre located less than 2 km from the proposed development; and the Lime Down report itself acknowledges that Membury had no specific horse-industry impact assessment at planning stage. Exercise gallops, bridleways, riding lessons and general equestrian routes are transient or actively controlled uses. They do not reproduce continuous exposure of broodmares, foals and yearlings living immediately beside construction.

Veterinary / evidential objection

A broodmare unit cannot reschedule foaling, lactation, turnout, spontaneous field behaviour, neonatal care or emergency veterinary procedures. Yearlings and foals loose in paddocks are not analogous to ridden horses passing along a route under human control. These comparator schemes therefore provide little empirical evidence that an adjacent Thoroughbred breeding unit will be unaffected.

Sunnica - the most relevant comparator

Sunnica is the exception because its examination did include genuine breeding-stud receptors. That makes the way it is presented especially important. The Lime Down summary concentrates on gallops, exercise/training routes, traffic management, timing and screening, but does not reflect highly relevant Sunnica examination evidence concerning Brookside Stud and other studs. That evidence described the proposed BESS as almost adjacent to Brookside Stud and raised concerns involving broodmares and young foals, bolting and injury, loss of usable paddocks and business effects. In other words, the most comparable element of the case-study record raised substantially the same stud-specific concerns now raised at West Park.

Conclusion

The case studies cannot properly be used as a collective demonstration that equine impacts are manageable. Most do not involve an adjacent commercial breeding stud at all; the one that does contain genuinely comparable stud evidence is materially less reassuring than the Lime Down summary suggests.

12. Business viability, client confidence and bloodstock insurance remain insufficiently assessed

Report weakness

The report acknowledges differences in equine hearing yet relies substantially on human/residential environmental assessment. It also concludes that significant business effects are unlikely without modelling the individual financial resilience of West Park.

Veterinary objection

A Thoroughbred-specific commercial assessment should include client confidence, loss or alteration of paddock use, additional staffing, horse throughput, sales preparation and value, and bloodstock insurance. Major construction immediately adjacent to premises housing high-value bloodstock is a potential underwriting consideration that should form part of the commercial assessment, including any implications for notification requirements, policy terms, premiums, deductibles, exclusions or insurability.

Evidence

The report does not appear to address this potential insurance and insurability consequence. It should therefore be treated as an additional commercial risk pathway requiring assessment alongside the other identified effects on the operation of the stud.

Overall Conclusion

The Equine Business Report moves too readily from the general capacity of horses to habituate, and from case studies that are frequently not comparable with an adjacent Thoroughbred breeding operation, to a conclusion that significant adverse effects are unlikely. In my opinion, that progression is not adequately established by the evidence cited.

The relevant population includes individually reactive horses, maiden mares, foals, yearlings and continually arriving non-habituated bloodstock. The relevant consequences extend beyond visible startle behaviour to catastrophic injury, altered foraging and physiological arousal, gastric health, broodmare and foal nutrition, safe veterinary and husbandry procedures, youngstock development, client confidence, sales value and potentially bloodstock insurance.

For a high-value Thoroughbred stud, a single unpredictable adverse behavioural event may be sufficient to cause irreversible loss. Repeated lesser effects may also accumulate into substantial veterinary, welfare and commercial consequences. These issues require site-specific and Thoroughbred-specific assessment rather than reassurance based principally on studies of other equine populations, controlled stimuli or transient equestrian uses.

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Veterinary Surgeon

Veterinary Surgeon

Signed: _____

Date: _____

13/08/2026

APPENDIX - REFERENCES

Lime Down Solar Project

- Bondo, T. & Jensen, S.K. (2011). Administration of RRR-alpha-tocopherol to pregnant mares stimulates maternal IgG and IgM production in colostrum and enhances vitamin E and IgM status in foals. *Journal of Animal Physiology and Animal Nutrition*, 95(2), 214-222. <https://doi.org/10.1111/j.1439-0396.2010.01043.x>
- Elliott, C., Morton, J. & Chopin, J. (2009). Factors affecting foal birth weight in Thoroughbred horses. *Theriogenology*, 71(4), 683-689. <https://doi.org/10.1016/j.theriogenology.2008.09.041>
- Henke-von der Malsburg, J. & König von Borstel, U. (2026). Constant traffic noise affects the behavior and physiology of naïve horses at pasture. *Frontiers in Ethology*, 5, 1802957. <https://doi.org/10.3389/fetho.2026.1802957>
- Janicka, W., Próchniak, T., Mierzicka, M., Wnuk-Pawlak, E. & Wilk, I. (2024). Persistency of horse habituation to distracting sounds. *Journal of Veterinary Behavior*, 74, 11-18. <https://doi.org/10.1016/j.jveb.2024.06.011>
- Klitzing, L., Kirsch, K., Schindler, M., Merle, R., Hoffmann, G., Thöne-Reineke, C. & Wiegand, M. (2025). Exploring factors that influence the behavior response to novel object tests in young Thoroughbred horses: investigating sex, test site and auction history. *Frontiers in Veterinary Science*. <https://doi.org/10.3389/fvets.2024.1478350>
- Pagan, J.D., Phethean, E., Caddel, S., McFaul, M., Bonner, P., Nowara, D., Perriam, W. & Huntington, P.J. (2023). Factors affecting birth weights in Thoroughbred foals born in Kentucky, United Kingdom, and Australia. *Journal of Equine Veterinary Science*, 124, 104419. <https://doi.org/10.1016/j.jevs.2023.104419>
- Powell, B.B., Horvath, K.C., Gilliam, T.L., Sibille, K.T., Keil, A., Miller-Cushon, E.K., Wickens, C.L. & Brooks, S.A. (2023). Behavioral and physiological reactions to a sudden novel object in the weanling horse: Quantitative phenotypes for future GWAS. *Genes*, 14(3), 593. <https://doi.org/10.3390/genes14030593>
- Sykes, B.W., Hewetson, M., Hepburn, R.J., Luthersson, N. & Tamzali, Y. (2015). European College of Equine Internal Medicine Consensus Statement - Equine Gastric Ulcer Syndrome in Adult Horses. *Journal of Veterinary Internal Medicine*, 29(5), 1288-1299. <https://doi.org/10.1111/jvim.13578>
- Wilsher, S. & Allen, W.R. (2006). Effects of a *Streptococcus equi* infection-mediated nutritional insult during mid-gestation in primiparous Thoroughbred fillies. Part 1: placental and fetal development. *Equine Veterinary Journal*, 38(6), 549-557. <https://doi.org/10.2746/042516406X156497>
- Yokomori, T., Tozaki, T., Ohnuma, A., Ishimaru, M., Sato, F., Hori, Y., Segawa, T. & Itou, T. (2024). Non-synonymous substitutions in Cadherin 13, Solute Carrier Family 6 Member 4, and Monoamine Oxidase A genes are associated with personality traits in Thoroughbred horses. *Behavior Genetics*, 54, 333-341. <https://doi.org/10.1007/s10519-024-10186-x>

20/08/2026

Dear Sir Madam

Following the release of the Equine Business Report relating to the proposed Lime Down Solar Park, I feel once again that the developers have somewhat missed the mark in regards to the impact to the local community and in this case specifically, the local equine community.

As a practicing farrier based less than three miles from a proposed site, I am hugely disappointed that I have not been included in further impact evaluations to the industry. I not only service clients at every property on [REDACTED]. Not only will the solar farm have an economic effect to my business but I also breed and graze young stock bred for showjumping on [REDACTED]. The report fails to mention the entire sports horse sector, which in itself contains showjumping, dressage and event horses.

Supporting evidence in the report is poorly researched and shows a distinct lack of understanding of the industry leaving the author with little to no credibility on the matter.

The report uses Christensen J. W. 2005, (Fear in Horses) to incorporate the idea of a 5-30m flight zone. It is worth noting that the stimuli in this case was a 75cm stationary traffic cone placed next to the equines feed source and data was primarily collected using heart rates as a gauge of fear. Christensen J. W. 2005 also mentions other studies where the stimuli include artificially produced boar smell, and eucalyptus oil!

None of the studies include the heavy industry construction site practices involved in the development of a solar farm. Nor do they use the uncontrolled environment of a herd in a paddock.

There are many studies that will go on to show that there is little in the way of predictability in the horse when scared. I would suggest that the report should have looked into studies carried out on Belgian police horses that indicate that there is no limit to the flight zone of the frightened horse.

Studies using sound frequency as stimuli quoted in the report offer no supporting evidence to support the theory that horses will become accustomed to site works, given that the report offers no indication of previously tested sound frequencies from this type of development. The studies concentrated on repetitive habitual or white noise. Not the varying levels of noise associated with heavy industry.

I find it disappointing that the report used Equine Canada, and sought to so heavily quote from their hand book "Equine Canada, National Farm Care Council". The United Kingdom has an enviable wealth of knowledge in the equine industry and industry specific guidance could have been gathered through the British Federations and associated bodies. All of which have a far greater understanding of the management practices of horses in this country.

In the acquisition of poorly selected evidence, the report has done nothing to ease any concerns of both human and equine safety during the period of construction. Furthermore, it highlights the authors lack of understanding and their will to circumvent real issues with the development by using poorly selected literature sources and quotes.

In regards to the practical issues I face as a business owner, as I explained to Will Threlfall on his site visit to West Park Farm on 11th June 2026. I base my financial forecasts on the basis that each horse is worth between [REDACTED] per annum to my business. The destruction of local equine businesses around the selected sites will have a crippling effect on my own business.

During the site visit to West Park Farm the sight of the visitors spooked the horses I was working on resulting in them getting loose and left one mare with an open wound that required treatment. Suggestions that horses in these numbers can be managed in a way to avoid issue is both naive and disingenuous.

I remain concerned about my own safety in trying to maintain the welfare of horses in the close proximity of heavy industrial construction site, I do not believe there is president for having large scale development in such close proximity to equestrian properties of this kind.

As a priority I hope that those involved in the development of the Lime Down Solar Park realise the seriousness of the impact to the local communities and with particular attention to the

equine industry which has a vital role in the local community in this area. Thus far the report looks written thin in expertise with little in the way of facts and understanding to both human and equine welfare.

Yours Faithfully

Andrew Pivars