

Summary of Representation to the Planning Inspectorate

by Chris Waltho on 23rd September 2026

following written objection Submission ID [REDACTED]

(Library ref. [REDACTED])

Planning Application:

Lime Down Solar Project

Applicant:

Lime Down Solar Park Ltd.

Hearing:

Compulsory acquisition hearing 2

Affected Person on whose behalf representation is made

Angus Methuen-Campbell

Interested Party reference:

[REDACTED]

- 1) My name is Chris Waltho and I am employed as [REDACTED] of the [REDACTED]. I am a [REDACTED] and have worked on the [REDACTED] for the last 38 years.
- 2) The cable route (as defined by the Book of Reference APP-020 of June 2026 rev.3, plot nos. 12-001 – 14-047) extends to an area of some 80 has of Mr Methuen-Campbell's land (shaded blue on the associated plan) over which the Applicant is seeking acquisition/restriction rights.
- 3) On the basis that the working width is in fact 30m, it is difficult to understand why the Applicant needs to secure rights over an area equivalent to 400% of that represented by the working width.
- 4) The apparent surplus "blue land" impacts especially on affected holdings farmed respectively by two of Mr Methuen-Campbell's

tenants. This is because much of their land abounds the Great Western Railway mainline where the cable route is ill-defined on account of:

- Ground investigation surveys having not yet having been carried out; and
 - (as has recently been confirmed) the absence of any agreement between the Applicant and Network Rail as to where the cable route should cross the railway line.
- 5) The consequential uncertainty makes it very difficult for the two farm businesses (both of which are mixed farms with grazing livestock and arable enterprises) to plan their stocking and cropping over an anticipated three year construction phase.
- 6) I understand that Orders are not made to confer rights that are not reasonably required for the delivery of a development scheme.
- 7) Bearing in mind for how many months the preferred cable route has been known, its apparent trajectory beneath the expanse of blue infill on the map at Easton/Thingley (nearly 40 has) and the fact that that the cables cannot be diverted through acute angles, it is difficult to accept that anything like the full extent of land, over which acquisition/restriction rights are being sought, can be justified.
- 8) In short, ground investigation surveys should have been conducted/concluded at an early stage where it is clear that major engineering works are required. No approach was ever made to Mr Methuen-Campbell in this connection, although consent was readily given for the non-intrusive surveys undertaken across the Corsham Estate. If the opportunity had been taken to better establish the geological characteristics of the site and the engineering implications thereof, the request for rights over land which is critical for the continuation of the two farm businesses, but not necessary for the for the installation of the cable, would have been obviated.

- 9) The issues are of course compounded by the uncertainty surrounding the location of the railway crossing. Surely this should have been resolved (or at least nearing resolution) before the preferred cable route was chosen.
- 10) These circumstances have made it very difficult to make any meaningful progress towards agreeing an option with the Applicant's Agent as it cannot adequately define the extent of the rights it needs for the Lime Down Solar Park cable to be installed.