

23 September 2026

Dear Sir/Madam,

PINS REFERENCE NO: EN010168

DESCRIPTION: Development consent to construct, operate, maintain and decommission a solar photovoltaic (PV) generating station, with a generating capacity of more than 50 megawatts (MW) and associated infrastructure

LOCATION: Lime Down Solar Park, Wiltshire

This response comprises the Cotswolds National Landscape (CNL) Board's ('the Board's') Written Representations for submission at Examination Deadline 7- 2 October 2026. These comprise Post Hearing Submissions responding to action points arising from Issue Specific Hearing 5, 15 September 2026 and Submissions at Deadlines 5 and 6.

i. Response to action points arising from Issue Specific Hearing 5 (including the Board's concluding comments on PMIE 4)

ISH5 Action Point 1

At Issue Specific Hearing 5 ('ISH5') the Board's Planning Officer agreed that, along with other Interested Parties, the Board would comment upon the content and conclusions of the Applicant's '*Tranquillity Assessment – Effects of Construction Traffic on the Cotswolds National Landscape*' [REP5-099, 'the Tranquillity Assessment'], submitted at Deadline 5. This assessment was undertaken to address concerns raised by the Cotswold National Landscape Board (the Board) in our Written Representations submitted at Examination Deadline 3 – 15th June 2026 [REP3-154], specifically our comments made in respect of Potential Main Issue for Examination (PMIE) 4 concerning the routing of the construction (and decommissioning) traffic for sites A, B, and C and for several access points for the Cable Route Corridor and the impact that this traffic would have on the tranquillity of the CNL, one of its special qualities.

At ISH5, the Applicant's Transport Consultant discussed their latest estimates of HGV and overall traffic movements along the route, as outlined within their *Highways Technical Note in Response to Appendix A of the SLD Deadline 4 Submission* [REP5-107]. At ISH5, the Applicant stated that their latest 'worst-case scenario' estimates are for 56 HGV movements a day for the period when construction for Sites A, B and C will take place, which is a 265% increase over baseline levels of HGV traffic along Alderton Road and Fosse Way. In terms of overall road traffic, there would be a 30% uplift from the existing baseline for this period along this part of the route.

At ISH5, Stop Lime Down's Transport Consultant outlined how in addition to the 265% increase in HGV movements along Alderton Road and Fosse Way when Sites A, B and C are under construction, he estimates there would be increases of 152% when Sites A and B are under construction and 116% when Site C is under construction.



As outlined in our previous representations (discussed in detail in REP3-154), this level of increase in HGV movements and overall traffic movements is significantly in excess of the 10% 'rule of thumb' outlined within the Board's Tranquillity Position Statement and in the Board's view is likely to have a significant adverse impact on the tranquillity of the CNL for the duration of construction and decommissioning. Whilst the Applicant points to what they consider to be a current low baseline of HGV movements and the 'fleeting' experience of aural and visual disturbance created by HGVs, the Board considers that even the absolute figure of up to 56 HGV movements a day would have a significant adverse impact on tranquillity.

The Tranquillity Assessment separately considers the sections of the construction route from Site A entrance to Grittleton and from Grittleton to the M4 J18.

Site A entrance to Grittleton

The Applicant's Tranquillity Assessment highlights a baseline high level of tranquillity along the route between Site A and Grittleton (paragraph 6.2.6). Paragraphs 6.2.14 and 6.2.15 state that *"The effects on tranquillity of the Scheme during construction will create visual, aural and experiential changes reducing the level of tranquillity to Medium to Low along the transport route during the hours of construction. The effects on tranquillity of the Scheme in combination with the construction route during construction will create visual, aural and experiential changes across a larger area between Scheme A and Grittleton reducing the level of tranquillity to Low along the transport route during the hours of construction."* (emphasis added). The Board considers that a reduction in tranquillity from a baseline of high to low during hours of construction (and high to medium outside of these hours during the construction period) is significant. It is noted that a similar assessment (i.e. medium to low) is made for the equivalent period during decommissioning (paragraphs 6.2.23 and 6.2.24).

Grittleton to M4 J18

At Table 13-23 of their Environmental Statement Volume 3 Appendix 13-1 rev. 5 [REP5-061] the Applicant shows levels of % change in HGV traffic in excess of the 10%, 30% and 60% rules of thumb for the B4040 (+68.9%), B4039 (+75.9%) and Road west of Grittleton (102.9%) and in excess of 10% for total vehicles along the B4040 and Road west of Grittleton. Whilst the Applicant states these are the more heavily trafficked parts of the construction routes, all parts of the route through the CNL east of the A46 would still experience an increase in HGVs of more than 60% for the construction and decommissioning periods.

The Applicant assesses a baseline low to medium level of tranquillity for this stretch though this assessment covers both the area around the A46 and J18 of the M4 as well as the more rural, and tranquil, parts of the route along the B4040 and B4039. The Board disagrees with the conclusion of the Tranquillity Assessment that increases in HGV movements of between 70% and 100% on these latter stretches would result in *"no significant change to the current baseline that would increase or decrease tranquillity"* (paragraph 6.2.34). Whilst this is more likely to be the case for the M4 J18 and A46 sections, the Board considers that for the B4040, B4039 and Road west of Grittleton, the Scheme would result in a significant adverse impact on the tranquillity in this part of the CNL.

Whilst the conclusions of the Tranquillity Assessment are noted, the Board's position outlined at pages 4-5 of REP3-154 remains: routing these significant levels of construction traffic through these sections of the CNL, in particular the routes between the B4039 and the site, the Scheme would give rise to a **direct, major/moderate (significant) adverse** effect on the tranquillity of the CNL. Whilst it is acknowledged that in EIA terms, this impact would be 'temporary', it would be for a significant duration of time and for that period, the impact would be significant, direct and adverse. Fundamentally, routing construction traffic through the CNL at the levels predicted by the Applicant does not accord with the Board's guidance, particularly Section 4.5 of the Board's Tranquillity Position Statement.

Therefore, the Board maintains its position that routing construction traffic through the CNL conflicts with Policies CE1, CE5 and CE13 of the CNL Management Plan and by extension Policy 51 of the Wiltshire Core Strategy, paragraph N4 of the NPPF and NPS EN-1.

The Board considers that PMIE 4 remains unresolved and this is reflected in the Final Statement of Common Ground between the Applicant and the Board.

ii) Legacy Landscape

The Board welcomes the submission by the Applicant of *Imagery of Legacy Landscape* at Deadline 5 (REP5-100) and notes the additional photomontages to illustrate how the 'legacy landscape' may look after 60 years from seven representative viewpoints, including a selection within the setting of the CNL. While the Board supports the Applicant's intent to leave a positive, enhancing landscape legacy following decommissioning, we would note that there is no guarantee that the imagery shown in this document will be matched by the actual condition of the site after 60 years. Much will depend on effective establishment of planting and ongoing management for the life of the project including effective monitoring and adaptive management measures and noting the retention of some beneficial landscape mitigation and enhancement components would be at the final discretion of individual landowners in combination with environmental protections in force at the time of decommissioning.

iii) Time-Limited Enhancements

On a related matter, the Board wishes to comment further in respect of time-limited enhancements, to update the position outlined at REP5-128 in the Board's response to ExQ2 LV2.1 Part 3).

In Part 3), the question is, "*If enhancements are removed at decommissioning, would that then be considered a harm to the purposes of the Cotswolds National Landscape at decommissioning?*".

The Board now understands that for DCOs / NSIPs, the assessment should be based on the existing baseline situation (i.e. prior to DCO consent) rather than the condition at decommissioning. The Board agrees with the Applicant and Stop Lime Down that If the measurement should be based on the existing baseline situation, then if the enhancements were removed at decommissioning, this would not be a harm





to the CNL's purposes at decommissioning because the removal would be the cessation of a time-limited benefit, not the introduction of a new adverse effect.

Declaration of Use of Artificial Intelligence

The Board confirms there has been no use of AI in authoring these representations.

ENDS



