



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, namely the Board's closing statement.

The Board's Closing Statement (including the Board's conclusions on PMIE1)

The Board welcomes the engagement with the Applicant throughout the preparation, submission and examination of this DCO application. The final Statement of Common Ground Matters between the Applicant and the Board outlines matters agreed and where outstanding disagreement exists.

As outlined in our previous submission at REP3-154, the Board acknowledges and supports the avoidance measures incorporated into the Scheme which have been introduced with the aim of reducing development impacts and controlling any negative effects on the CNL and its setting as well as the mitigation and enhancement measures proposed by the Applicant, subject to the Board's comments on potential 'double-counting' between mitigation and enhancement.

However, the Board's assessment remains that notwithstanding the avoidance, mitigation and enhancement measures contained within the Scheme, it would still give rise to significant residual adverse effects on the natural beauty of the CNL and its setting, including effects upon:

- Its tranquillity, one of its special qualities, due to the proposed routing of construction and decommissioning traffic, in particular HGVs and AILs;
- Its special qualities overall; when considered alongside other adverse (but not significant) effects on special qualities aside from tranquillity, there would be a net significant adverse effect on the CNL's special qualities overall;
- The landscape character of the Site itself which lies within the CNL's setting and the landscape character within the 1 km local study area which includes land within the CNL. Proposed mitigation would reduce the scale of this effect by Year 15, but the Board considers adverse effects would remain significant for the duration of the development.

The Board acknowledges that, due to the nature of the Scheme, these effects should be considered 'temporary', however we observe that the operational phase is still classed as 'long term', defined at paragraph 1.6.19 of LVIA Appendix 8-1 [APP-187] as being '10-40 years (or longer)'.

In relation to the relevant planning policy and guidance outlined within our previous Relevant Representations [RR-0944], we consider that the Scheme conflicts with Policies CE1, CE5 and CE13 of the Cotswolds National Landscape Management Plan 2025-2030 and Sections 9.13, 9.14, 11.4, 11.12, 11.13 and 14.4 of the Cotswolds AONB Landscape Strategy and Guidelines. In turn it would also conflict with Wiltshire Core Strategy Core Policy 51 and paragraph N4 of the National Planning Policy Framework August 2026 (and paragraph 189 of the National Planning Policy Framework December 2024). We also consider that it does not comply with NPS EN-1, notwithstanding the NPS' caveat at Section 5.10 that virtually all NSIPs will have adverse effects on the landscape. The Board considers that whilst the Project has sought to minimise the degree of harm to the landscape, a development of this scale in this location to be constructed in the manner proposed (i.e. routing most construction traffic through the CNL) will still have a net significant adverse impact on the natural beauty of this nationally designated landscape.

The Board's position on large scale solar energy proposals such as this, outlined at paragraph 3.4.4.13 of our Renewable Energy Position Statement is that "For larger schemes that might be put forward, Applicants should be required to demonstrate that the scheme could be accommodated without significantly affecting the natural beauty of the CNL". As previously outlined within our Relevant Representations, whilst the Position Statement was principally intended to outline the Board's position regarding renewable energy proposals within the CNL, the Board considers this to be an appropriate position relating to proposals which lie within the CNL's setting and have the potential to impact the CNL.

As such, the Board continues to **object** to this DCO application and recommends that consent should not be granted. It also considers that PMIE 1 remains unresolved.

For avoidance of doubt, our position regarding the 'seek to further' duty at Section 85 of the Countryside and Rights of Act 2000 remains unchanged; please refer to our comments on pages 8 and 9 of REP3-154 on this matter.

Declaration of Use of Artificial Intelligence

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

ENDS



