

POST-HEARING SUBMISSION

Lime Down Solar Park DCO — Compulsory Acquisition Hearing 2 (CAH2), 23 September 2026

Submitted by: KMT Farming & Consultancy Limited [REDACTED]

On behalf of: Mr John Eavis and Mrs Rosemarie Eavis, [REDACTED] (the Owners)

Plots: 05-043 and 06-001 to 06-006 | Refs: [REDACTED]

1. Summary of oral case at CAH2

[REDACTED] appeared at CAH2 to provide an update on the Owners current position. The following points were made.

Frustration at lack of clarity. The Owners have been engaged with this application for almost two years. Throughout that time, basic clarity about what the scheme genuinely requires from their land has been slow to arrive. Some of that clarity has only been provided in recent weeks and months, and further important technical detail — including the nature of the interconnecting cables between Lime Down D and E and the rationale for the wide order limits in this location — was provided for the first time at the hearing itself. The Owners welcome this clarity but note that it has started to be put forward later in the process than it should have.

Progress acknowledged, but significant distance remains. The Owners acknowledge that there has been movement in recent weeks, including some clarity on the temporary treatment of the access tracks. However, the Owners do not consider themselves close to voluntary agreement. The CA justification tests have not, in the Owners' submission, been comprehensively satisfied in respect of [REDACTED]. A full assessment of this position will be set out in the closing submission at Deadline 8.

Wider farm business impacts. The Owners drew the Examining Authority's attention to the fact that the impact of this scheme on the Eavis family extends well beyond the land take itself. The wider implications for the farm business — investment decisions, agri-environment scheme participation, long-term planning, and the operational and commercial consequences of permanent easement rights over a significant portion of the holding — have not yet been fully acknowledged by the applicant. Whilst there has been an attempt by the applicant to mitigate construction impacts, the fact that permanent construction and operational rights (for any purpose associated with the project and at any time) will persist throughout the project still presents a very significant burden to the Owners.

Funding statement concern. The Owners raised a concern about the adequacy of the Funding Statement, noting that it contains a bare assertion of financial confidence without supporting evidence, and that recent Secretary of State decisions have applied the CA Guidance standard on funding with greater rigour.

DCO documentation — capturing commitments. The Owners asked whether the agreed position on the temporary treatment of the access tracks could be captured within the DCO documentation rather than left solely to a contractual arrangement. The Examining Authority directed the Applicant to reflect this commitment in the CTMP, the CEMP, and the mitigation route map, and to direct the Owners to the relevant sections at Deadline 7. The Owners will review those documents when published.

2. Response to hearing action points

Action: Meeting with [REDACTED]

The Owners confirm that they are actively seeking to arrange this meeting and will pursue it with urgency. At the time of this submission the meeting has not yet taken place. The Owners will report on the outcome of that meeting, and on any additional clarity it provides on the scheme requirements for [REDACTED], in their closing submission at Deadline 8.

Action: Review of CEMP section 3.6 (Rep 6-029) and Operational EMP section 3.6 (Rep 6-031)

The Examining Authority drew the Owners' attention to updated drainage commitments in section 3.6 of both the Outline Construction Environmental Management Plan (Rep 6-029) and the Outline Operational Environmental Management Plan (Rep 6-031). The Owners are reviewing those documents and will provide their assessment of the adequacy of those commitments for [REDACTED] in their closing submission at Deadline 8.

Action: DCO documentation — temporary access track commitment

The Examining Authority directed the Applicant to capture the commitment to remove the physical access tracks after construction in the CTMP or CEMP and the mitigation route map, and to direct the Owners to the relevant sections at Deadline 7. The Owners will review the Deadline 7 documents when published to confirm this commitment has been incorporated.

3. Common themes across affected parties

The Owners note that CAH2 produced consistent and independent accounts from all affected parties heard at the hearing — [REDACTED] (represented by [REDACTED]) and Greenenergy Renewables — that reflect very similar concerns to those raised on behalf of the Owners throughout this examination. In particular:

1. Basic information about what the scheme requires from individual landholdings has only been provided very late in the examination — and in some cases for the first time at CAH2 itself.
2. The cable route between Lime Down D and E — affecting the Eavis and Bailey landholdings — is uniquely and disproportionately undefined compared to the remainder of the cable route.
3. The engagement obligation under the CA Guidance has not been met to the standard required. The Examining Authority observed that "a lot of this information seems to only be coming to light and fully discussed at these hearings when there is limited time in the examination to bottom them out."
4. The order limits in the area between Lime Down D and E are wider than demonstrated to be necessary. It cannot be established that these rights are 'reasonably required'.

At this late stage of examination, the Owners do not believe that the Applicant is able to demonstrate that they meet the engagement and compulsory acquisition tests required by the relevant guidance and legislation.