

From: [REDACTED]
To: [Lime Down Solar](#)
Cc: [REDACTED]
Subject: Late submission
Date: 07 October 2026 11:24:59
Attachments: [TBASubmissionLimeDown01.10.26\[3\].pdf](#)

Interested Party Reference number: [REDACTED]

Please accept my sincere apologies for not sending these documents onto you sooner. We had crosswise at our end having thought personally that this had been completed by our legal team with whom I shared the documents straight after my representation.

The documents I used in my comments on 22nd Sept beyond those in my submissions & questionnaires included the attached:

[REDACTED]
[REDACTED]
[REDACTED]

I feel the economic impact caused by studs being closed is being underestimated by the applicant. The sport is on the cusp of breakdown with the foal crops in UK already -20% from peak. More studs closing is seen to be the straw that might break the back of an industry worth £4.1bln, bringing £300m in taxation per year, 85,000 rural jobs.

[REDACTED]
[REDACTED] Economic impact details are outlined in this article.
[REDACTED]
[REDACTED]
[REDACTED]

Moss Landing: <https://elkhornslough.org/files/publications/EMBER-Preliminary-Biota-Report-November-2025.pdf>

This was sent to me by our biggest client - [REDACTED] - who has 8 horses on our stud. [REDACTED] said [REDACTED] simply couldn't take the risk of keeping horses with us given the extent of the unknowns associated with horse health & solar farms. If [REDACTED] was to take away 8 horses, we would effectively go to [REDACTED] loss next year, a position that is unsustainable. In simple terms, our fixed cost base is [REDACTED] we make c [REDACTED] on each horse, hence anything below c40 horses in total and the business becomes unviable. Given this was sent on a whatsapp group with other owners we have a very negative situation building whereby others would follow suit.

Hence the comments when discussing paragraph 6.1-11 by the applicant such as "temporary disruption" and "no materially adverse effect" were unfathomable and

extremely ill-informed. In forming this highly subjective opinion, they didn't even suggest they had spoken to bloodstock stud owners, their staff, local experts, bloodstock industry experts, let alone the clients who send their incredibly valuable bloodstock to these studs.

My concerns of timings with regards to emergency surgery came were described in this article: [REDACTED]

[REDACTED]
[REDACTED] Horses being rushed to operating theatres in Breadstone [REDACTED] won't be able to have flashing light transport and with the increased HGV usage/construction work we are very concerned for their welfare, likewise for those needing to get to our nearest hospital given the likely increase in human injuries from horse handling, as discussed in the hearing yesterday (22nd Sept).

My fundamental line of questioning was threefold:

1. Economic impact - given these are studs already on the brink of commercial unviability, loss of customers is inevitable given Lime Down going ahead. While the area contains only 2% of the 660 studs in the UK, studies have shown this may be a tipping point in the second most attended sport in the UK, given the supply of foals suggests it is already on the brink of collapse.
2. Personal safety - I have a duty of care to my family, friends and staff. Suggesting [REDACTED] should bring in foals and yearlings when Fosse Way could well be subject to unpredictable HGV movement, with hospital access severely compromised, is simply not a risk I feel I should be asked to make.
3. Confidence in the consultation process - throughout we feel we have been given a very economical version of the truth and yesterday was no different. Will Threlfall claimed he had responded to one of my seven requests for him to visit our stud. He has yet to provide any evidence of such an exchange, let alone coming to speak to myself, staff and our local vets/farriers/feed providers and all that sit in a complex and far-reaching ecosystem that has been in place for many hundreds of years in one of the most well-known equine areas of the world. I suggested I followed up with him via email (see below) asking him for the evidence with which he replied to one of my seven requests to visit the stud with a suggested date or option. I still have no reply to that much in keeping with all the other emails when it came to a direct question as to whether he would be willing to come and meet our expensive team and ask them directly as to how we might be affected or indeed work together to ensure sufficient mitigation.

Please do let me know if there's any further you would need from my representation. I

would obviously be delighted to provide any further documentation that might be of use.

Kind regards,

Alex Frost

Sent from Outlook for Mac

From: Alex Frost

Date: Tuesday, 22 September 2026 at 11:11

To: [REDACTED]@islandgp.com

Cc: [REDACTED]

Subject: Requests to visit Ladyswood Stud

Good morning Mr Threlfall,

Would you be kind enough to share the emails and dialogue you were referring to in the hearing this morning?

My wife is there in person so perhaps you can show her? It would be good to substantiate the claims you made.

Best regards,

Alex

Alex Frost [REDACTED]

Lime Down Solar Park – Examination of Development Consent Order Application

Submission from the Thoroughbred Breeders' Association

The Thoroughbred Breeders' Association (TBA) is the representative body for Thoroughbred breeders in Great Britain. The TBA has been asked to comment upon matters concerning the Thoroughbred breeding sector arising during the Examination of the proposed Lime Down Solar Park.

The TBA does not seek to comment upon the merits of the proposed development as a whole, nor upon technical matters outside its expertise. Our comments are intended to assist the Examining Authority in understanding the particular characteristics of the Thoroughbred breeding industry and the factors relevant to the operation and commercial viability of Thoroughbred breeding businesses.

The local Thoroughbred breeding industry

The area affected by and surrounding the proposed Lime Down Solar Park contains an established concentration of equine activity, including a number of commercial Thoroughbred breeding and bloodstock operations.

This should not be regarded simply as recreational equestrian activity. Thoroughbred breeding and bloodstock businesses form part of a specialist rural industry, involving breeders, owners, stud staff, veterinarians, farriers, transporters and other supporting businesses and services.

Where assessing potential effects upon such businesses, the TBA considers it important that their particular operations are understood rather than treating all equestrian establishments as equivalent receptors.

The particular characteristics of a Thoroughbred stud

Commercial Thoroughbred breeding operations may accommodate pregnant broodmares, mares with young foals, weanlings, yearlings and other young or breeding stock. Many horses may belong to third-party owners and can represent substantial financial and bloodstock value.

Unlike a static population of horses, the population of a commercial boarding stud can change throughout the year as mares and youngstock arrive and leave for breeding, boarding, veterinary treatment, sales preparation and other purposes. Individual horses will differ in age, temperament, experience and management requirements.

These characteristics are relevant when considering disturbance and the practicality of mitigation. An assumption that horses already present at a particular location may become accustomed to a stimulus over time does not necessarily address the circumstances of young horses or new arrivals encountering that stimulus for the first time.

Environment and management are part of the commercial proposition

The physical and management environment offered by a Thoroughbred stud is an important consideration for owners deciding where valuable breeding stock should be kept.

Factors including safe turnout, appropriate paddocks and stabling, tranquillity, safe handling conditions, suitable access and confidence in the management environment can therefore have commercial as well as

welfare significance.

Owners of valuable bloodstock have choices about where their horses are boarded. Stud operators similarly have professional responsibilities when determining whether they consider their premises suitable for particular horses.

For that reason, the commercial consequences of environmental change cannot necessarily be assessed solely by asking whether horses are ultimately capable of habituating to particular stimuli or whether physical injury is predicted to occur.

Client confidence and business viability

For businesses caring for horses on behalf of third-party owners, reputation and client confidence are important commercial considerations.

An owner does not necessarily have to wait for an accident or demonstrated adverse welfare outcome before deciding that another location is preferable for their bloodstock. Similarly, a stud operator may consider changes to management necessary before an accident occurs.

The TBA therefore considers that, where the viability of a commercial Thoroughbred business is being assessed, it is appropriate to consider not only predicted physiological or behavioural effects upon horses but also the potential consequences for horse placement, client confidence, management requirements and the continuing commercial attractiveness of the establishment.

The TBA is not in a position to predict whether any particular client would remove a horse from any individual business affected by Lime Down. Our point is that these are legitimate features of the commercial operation of a Thoroughbred stud and should form part of any assessment purporting to determine effects upon business viability.

Mitigation in a working Thoroughbred environment

The practical operation of a breeding establishment should also be considered when assessing proposed mitigation.

Measures such as advance notification of potentially disruptive activity and liaison with neighbouring businesses can be helpful. However, notification does not necessarily remove the underlying effect.

Measures requiring a stud to alter turnout, relocate horses, change established management routines, provide additional supervision or reorganise movements may themselves have practical and commercial consequences.

The ability to move horses is also constrained by the circumstances of the animals concerned. Matters such as age, sex, breeding status, temperament, paddock availability and established groups may affect where horses can safely be placed. Foaling and veterinary emergencies cannot necessarily be scheduled around neighbouring construction activity.

Where reliance is placed upon such measures, the TBA considers it appropriate to establish whether they are practically achievable for the affected business and whether any additional management, staffing or commercial burden has itself been taken into account.

Conclusion

The TBA does not seek through this submission to reach a conclusion on the overall planning merits of Lime Down Solar Park or to predict the effects upon any individual establishment.

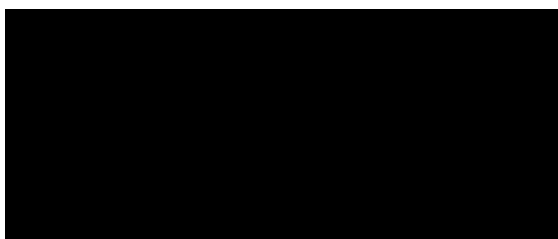
We do, however, consider it important that commercial Thoroughbred breeding operations are not treated simply as generic equestrian receptors.

The Thoroughbred breeding sector has particular characteristics arising from the nature and value of the horses involved, continually changing horse populations, the management of broodmares and youngstock, third-party ownership, and the importance of reputation and client confidence.

Accordingly, where effects upon the viability of Thoroughbred businesses are being assessed, consideration should extend beyond whether an individual horse may eventually habituate to a particular stimulus. It should also consider the practical operation of the stud, the management of changing and potentially inexperienced horse populations, the feasibility and consequences of proposed mitigation, and the commercial considerations which influence where owners and breeders choose to place valuable bloodstock.

The TBA hopes that these observations assist the Examining Authority in its consideration of the equine evidence before it.

Signed



Chief Executive – The Thoroughbred Breeders' Association