

I submit the attached closing statement and respectfully ask the Examining Authority to accept it at its discretion. The statement addresses matters I raised in my relevant representation of 25 November 2025 and at Open Floor Hearing 2 on 30 June 2026 which, in my view, remain unresolved. It draws on evidence already before the examination, including submissions made at Deadline 7, and introduces no new technical evidence.

#### Summary

I support a rapid transition to clean energy. Lime Down is the wrong scheme for that transition: the wrong size, in the wrong place. Six months of examination have not resolved the three matters I raised at the outset.

First, harm to the Cotswolds National Landscape. Wiltshire Council and the Cotswolds National Landscape Board both consider the landscape's setting to be wider than the applicant accepts, taking in the Fosse Way corridor. The Council judges the effects on routes through the scheme to be significant for its whole life and says the applicant has consistently downplayed them. The Secretary of State has a duty to seek to further the purposes of the National Landscape; this scheme works against them.

Second, construction traffic on roads that cannot take it. On the applicant's own October figures, daily lorry movements rise by over 270% on both the Fosse Way and Alderton Road. At the close of the examination the lorry numbers were still not agreed with the highway authority, which describes the absence of road improvements at Bradfield Cottages as unacceptable.

Third, harm to the local economy. Wiltshire Council has significant concerns that many local businesses could become unviable, including stud farms, wedding venues and village pubs, and that some may struggle to obtain insurance during construction.

I ask the Examining Authority to recommend that development consent be refused.

#### 1. Introduction

I am the Member of Parliament for South Cotswolds. The Lime Down site lies within my constituency, and I make this statement on behalf of the communities around it, including Malmesbury, Sherston, Alderton, Foxley, Grittleton, Hullavington, Rodbourne and Norton.

Before entering Parliament I spent twenty years campaigning on the climate and nature crises, including rowing solo across three oceans to draw attention to them. I want this country to decarbonise quickly, and I support solar power: on rooftops, on brownfield land and, wherever possible, in community ownership.

My position on this scheme has been consistent. I secured a Westminster Hall debate on solar development and agricultural land in January 2025, objected in my relevant representation of 25 November 2025, and spoke at Open Floor Hearing 2 on 30 June 2026. As I said then, the people of this area are not opposed to green energy; they oppose development of this scale in this place.

This closing statement explains why the matters I raised remain unresolved at the end of the examination. It concentrates on three: the Cotswolds National Landscape, construction traffic and the local economy. It then sets out the experience of the community and my request to the Examining Authority. Throughout, I rely on the evidence of the host authority, the Cotswolds National Landscape Board, parish councils and residents, as well as the applicant's own documents.

#### 2. The Cotswolds National Landscape and its setting

The duty. Section 85 of the Countryside and Rights of Way Act 2000, as amended by section 245 of the Levelling-up and Regeneration Act 2023, requires the Secretary of State to seek to further the purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape, including through decisions that affect it from outside its boundary. Section 5.10 of NPS EN-1 gives protection to the landscape and natural beauty of designated landscapes and their settings.

The setting is wider than the applicant accepts. The applicant draws the setting of the National Landscape only 300 to 600 metres from its boundary, based on whether the two can be seen from each other. Wiltshire Council and the Cotswolds National Landscape Board both disagree, and both consider that the Fosse Way corridor and the land to its north-west form part of the setting. The Board points to a solar appeal decided on 15 July 2026 (APP/D3505/W/25/3370515), in which the Inspector found that setting is about more than intervisibility, and that harm to sequential views on the approach to a National Landscape harms its setting. The Fosse Way leaves the National Landscape near Foxley and re-enters it between Alderton and Grittleton. Walkers, riders and cyclists using it would travel through this scheme on their way into one of England's most valued landscapes.

The applicant's position is inconsistent. In August the applicant agreed, at the Board's request, to remove all panels from Field A1, saying this would further protect the setting of the National Landscape. At the same time, it maintains that the southern part of that field lies outside the setting. I welcome the removal. It also shows that the scheme's siting was not led by the landscape from the outset, and that further removals are practical. Even after this change, the applicant accepts that users of bridleway SHER16 will experience significant adverse effects for the life of the scheme.

The effects have been understated. Wiltshire Council considers that the scheme does not and could not comply with Core Policy 51 of the Wiltshire Core Strategy on landscape. At Deadline 7 it assessed the effects on routes through Sites A, B and D, including the Fosse Way and Wiltshire Cycleway, as major/moderate to moderate adverse, and therefore significant, throughout construction, operation and decommissioning. It describes the applicant's assessment as consistently downplayed, and its claim that effects near Site B will fall to minor or neutral within 15 years as implausible. The applicant itself accepts significant effects on recreational use of the Fosse Way and on footpaths HULL1 and NORT10 for the lifetime of the scheme.

Mitigation does not answer the harm. The applicant relies on letting hedgerows grow to 4 to 5 metres. Wiltshire Council warns that square-topped hedges at that height will look out of place and will close off the open views that give this landscape its character. The wildflower meadows offered as enhancement are temporary. The Board advises that temporary enhancements should carry reduced weight, and that their removal at decommissioning would itself harm the setting.

Scale and cumulative change. The scheme would place 748 hectares of panels across five separate parcels within a 46 square kilometre area, joined by a 22 kilometre cable route. Wiltshire Council warns of a "creeping baseline", in which this part of North Wiltshire is turned, scheme by scheme, into a solar landscape. The dispersed layout spreads the harm across more lanes, footpaths and viewpoints rather than containing it.

Taken together, this evidence shows lasting harm to the setting of a nationally protected landscape. A scheme of this kind cannot be reconciled with a duty to seek to further that landscape's purposes, and the proposed mitigation does not change that.

### 3. Construction traffic

In my relevant representation I raised residents' concerns about heavy goods vehicles on narrow rural roads. At the close of the examination those concerns are better evidenced and no closer to being resolved.

The applicant's own figures. The latest version of the applicant's transport chapter (ES Chapter 13, Revision 5, October 2026) forecasts steep increases in daily HGV movements during a 24-month construction programme, including rises of over 270% on both Alderton Road and the Fosse Way.

The applicant nonetheless concludes that there would be no significant transport effect anywhere, and rates both the Fosse Way and Bradfield Cottages as of low sensitivity. The Fosse Way lies within the setting of the National Landscape, forms part of the Wiltshire Cycleway, and carried 93 cyclists on a Saturday during proposed delivery hours in the applicant's own survey. I do not see how it can reasonably be judged of low sensitivity.

The numbers are not settled. During the examination the applicant's estimate of the number of solar panels rose from 588,988 to 842,500, and its estimate of HGV movements to the solar sites from 26,086 to 35,054, with a further 20,160 for the cable route. At Deadline 7, Wiltshire Council recorded that HGV trip generation remained under discussion, that the applicant's main traffic table had not been updated, and that key assumptions behind the lower figures were unproven, including how many panels and mounting structures each lorry can carry and how much excavated spoil will leave the site. The Examining Authority cannot yet be confident that the reasonable worst case has been assessed.

The roads cannot take it safely. As highway authority, Wiltshire Council considers the absence of any road improvements between The Street junction and Bradfield Cottages to be unacceptable. The road is already damaged by vehicles running onto the verge, and repairing it during construction would need a road closure with no clear alternative access to Site D. On the Fosse Way, the Council considers gaps of around 300 and 380 metres between passing places excessive and unacceptable. Hullavington Parish Council has shown that a well-used community walking route, with no footway and a narrow railway bridge, was never specifically assessed, and that school buses use Norton Road at the times construction traffic would. Grittleton Parish Council has shown that HGVs would use The Street, in the Grittleton Conservation Area, where 28 of the parish's listed buildings stand, to reach a compound beside the village hall, recreation ground and playground.

Independent evidence. The transport expert instructed by Stop Lime Down concludes that the effects would be significant on Alderton Road and the Fosse Way for two years and at Bradfield Cottages for the whole construction period, and significant in Acton Turville and Burton, where pedestrians already share narrow roads with traffic.

The traffic effects therefore remain unresolved at the close of the examination, on roads that run through the setting of the National Landscape. They are a second and independent reason to recommend refusal.

### 4. The local economy

The economy of this area depends on the same landscape and lanes that the scheme would change. At the June hearing I said that the effects on farming and tourism had not been properly weighed. The evidence since then confirms it.

Tourism. In its Local Impact Report (REP1-137), Wiltshire Council judged the overall effect on tourism to be negative and contrary to the economic policies of the Wiltshire Core Strategy, and expected likely business closures at every phase of the scheme. The applicant's own worst case is the loss of around 50 tourism jobs during construction and 11 for the operational life of the scheme. It treats these losses as not significant by averaging them across a 5 kilometre study area, which hides the concentrated harm to the businesses closest to the sites.

Equine businesses. North Wiltshire is home to a significant thoroughbred breeding industry. Wiltshire Council told the Examining Authority that the scheme places eleven stud farms in the area at serious economic risk, and at Deadline 7 it recorded significant concerns that many existing businesses could become unviable, because owners of valuable horses would be unlikely to place them near construction whatever mitigation is offered. The Council has also seen evidence that insurers may treat the construction period as a material change in risk and raise premiums or decline cover. The applicant first assessed the two nearest studs as livery yards of medium sensitivity. It later described them correctly as commercial breeding operations but left its conclusions unchanged. Its own figures show construction noise rising by around 11 decibels at West Park Farm, roughly a doubling in perceived loudness, measured against thresholds designed for people rather than horses. Mares cannot be made to foal around a construction programme.

Other businesses. Grittleton House, a Grade II\* listed wedding and events venue, was not assessed by the applicant as a tourism business; a construction compound would sit in view of its wedding lawns. The Angel in Sherston, which relies on walkers and cyclists, expects to become unviable. Whatley Manor, which employs over 100 people, was assessed only by proxy, using a nearby spa.

Farming. The scheme would take around 878 hectares of productive farmland out of food production for its lifetime, at a time when the country should be strengthening its food security.

Who benefits. Wiltshire Council observes that the scheme's ongoing economic gain would mainly benefit the landowners receiving payments, and considers the applicant's estimate of local construction jobs optimistic given low local unemployment. The benefits are largely temporary or leave the area; the costs fall locally and last for decades. Wiltshire Council now considers the case for a business compensation fund increasingly apparent, and I support that proposal.

### 5. The community and compulsory acquisition

In my relevant representation I described the stress this proposal has caused to a community that values its natural environment. That stress has continued throughout the examination. When Grittleton Parish Council surveyed its residents in October 2025, Lime Down was the most cited concern alongside road safety. The applicant accepts that Hullavington is among the communities most affected by the scheme, yet has not explained why that does not amount to a significant effect.

Compulsory acquisition powers may only be granted where there is a compelling case in the public interest (section 122 of the Planning Act 2008). Given the harm set out above, and the availability of less damaging ways to generate the same power, I do not consider that case has been made. In August even Wiltshire Council, as landowner and highway authority, told the Examining Authority it could not tell what rights were being sought over its land or whether they were necessary and proportionate. Private landowners are in a weaker position still. At the June hearing a local landowner described surveyors entering his farm uninvited on two occasions; the applicant apologised.

## 6. Conclusion

Solar power has a vital part to play in this country's future, and North Wiltshire is willing to play its part potentially through community owned green energy schemes. This examination has tested whether this scheme, at this scale and in this place, is an acceptable way of doing so. The evidence before the Examining Authority shows lasting harm to the setting of a nationally protected landscape, construction traffic that the local roads cannot safely carry, and a real risk to the businesses that sustain these villages.

There is a better way. Wiltshire's own planning policies ask that large renewable schemes compare favourably with less intrusive options such as building-mounted solar, deliver lasting benefit to local communities, and strongly support community ownership. Clean energy built on rooftops and brownfield land, and owned in part by the people who live alongside it, would bring this community with the energy transition and give it a stake in its success.

I respectfully ask the Examining Authority to recommend to the Secretary of State that development consent be refused. The people of North Wiltshire have engaged with this examination thoughtfully, in detail and in good faith. I hope their evidence, and that of their councils, will be given the weight it deserves.

■ Roz Savage MP

Member of Parliament for South Cotswolds