

16th October 2026

Dear Planning Inspectorate,

Having reviewed the responses by the Applicant in EN010168/EXAM/9.79 "The Applicant's Response to Outstanding Matters from Deadline 6 and the Submission Received at Deadline 6B" item 6.1) to my previous submission (REP6-083) relating to increased flood risk off-site at Foxley from the Lime Down Solar Development, I would like to make this Closing Statement.

1. AC-001 the Applicant states "..... the Solar PV Panelled Areas will remain predominantly permeable"

While the permeability of the land will largely remain, I believe the ability of a Solar PV sites' permeable capacity to be fully utilized will be reduced by the Solar Panels characteristic "curtaining" of water into concentrated streams at relatively high velocity that will naturally find the fastest (least resistant) route into existing water courses.

It's a matter of water dispersal, and could be likened to the difference between using an open ended garden hose to water the garden (channels forming and soil being washed away) vs. using a hose with a spray head attachment (water is dispersed gently over a wide area and soil remains stable).

2. AC-002 the Applicant states "These areas will remain predominantly permeable, with existing ground levels, overland flow routes and drainage pathways retained."

My response is to repeat point 1 above.

The Applicant makes reference to REP5-98 for further details - I believe this should be REP5-97. In REP5-97 the Applicant refers an old (2013) study and I question it's relevance with the regard to the large panels being proposed - the proposed panels are untypical, therefore the characteristics around panel run-off can reasonably be assumed also to be untypical.

With reference to the Statement of Common Ground with Wiltshire Council, this does not in itself assure me, because other parties do not have the full history or understanding of the flooding incidents at Foxley that I have gained from living next to Norton Brook for over 35 years.

No-one has ever approached us seeking information and evidence on which to form a better qualified understanding of the brook's actual behavior.

There is a general acknowledgement of a lack of complete formal records.

3. AC-003 the Applicant states "The Applicant does not rely solely on mature vegetation to manage runoff and there is no unmitigated three to five-year vegetation establishment period."

It appears to me that with regard to the Solar PV panels, established vegetation is the only pro-active means proposed to manage the associated run-off. Other mitigations mentioned are in response to the issues associated with “hard” infrastructure (sub-stations, tracks, storage areas etc.), as well as Construction activities.

Therefore my original point still stands. Established vegetation may encourage water dispersal, but new, damaged or poorly managed vegetation will not.

I understand a recent update by the Applicant to the OOEMP (version 8) suggests temporary SuDS could be implemented in the event remediation failures. Possibly doing something after the event does not provide assurance. The risks and consequences of such an incident should not be borne by the owners of downstream property, infrastructure (roads, bridges etc.) and land.

4. AC-003 the Applicant states “The relevant consideration for the Scheme is whether it would increase existing flood risk. For the reasons set out in AC-002 and AC-003 above, the Solar PV Panelled Areas remain predominantly permeable, existing drainage pathways are retained, construction-phase runoff and compaction are controlled, and runoff from areas requiring formal drainage is attenuated and controlled.”

I continue to challenge this position based on my points 1 - 3 above.

In conclusion, I believe the Applicant must at the outset establish SuDS on the boundaries of the Solar PV sites / water courses to ensure the water courses are not overwhelmed by increased flow rates. To proceed with the Development as currently proposed is essentially an “experiment” that introduces new flood risks in an area already suffering from flooding issues. The consequences of failure to control new excess flows is potentially devastating to people and organizations.

I remain of the opinion that the proposed development should be rejected in its current form.

Yours Faithfully,

Andrew Calderbank