

Comments on the Applicant's Response to the Stop Lime Down (SLD) Business Survey (EN010168/EXAM/9.86)

- I am pleased that the Applicant recognises that the SLD survey of businesses likely to be impacted by the proposed Lime Down solar project “provides useful evidence of business sentiment and of the concerns held by participating businesses, including concerns regarding indicative impacts to turnover, employment and business viability.” (3.3.14) This is correct.
- However, I am surprised and disappointed that the Applicant's response uses a series of questionable criticisms aimed at discrediting the survey's methodology and findings. Two of these are based on very tenuous arguments:
 - The **first** of these repeatedly suggests that the survey's findings fail to include verifiable and quantifiable information on future events. For example, according to the Applicant, the survey's findings “do not establish the magnitude, duration or significance of the effects that *will* actually arise.” (3.3.13) [my italics]. This is an absurd observation: no survey can ever claim to make definitive statements about future events.
 - On the same theme, the Applicant observes that “a respondent's expectation that the Scheme may adversely affect its business is...relevant evidence of perceived risk, but should not be treated as demonstrating that the identified outcome *will* occur.” (3.3.4) [my italics].
 - Is this curious comment intended to identify a shortcoming of the survey's methodology and findings? If so, it betrays an astonishing disregard for the role that “perceived risk” plays in shaping decisions made by businesses on investment and employment; on stock, bond and currency investors' asset allocation; and on central banks' monetary policy. All these key decisions are by necessity a product of “perceived risks”, not on “outcomes” that they can determine “will

occur”. Strictly speaking, it is impossible to say that *anything* “will” occur.

- A **second** highly debatable comment made by the Applicant is its warning that the survey’s findings should “be understood as reflecting the responses of participating businesses rather than the views of all businesses approached.” (3.3.11)
- No survey, no poll, no election, no referendum, can ever aim to reflect anything other than the responses of willing participants. No survey, no poll, no election, no referendum can ever claim to reflect the views of all affected parties. Had the Brexit referendum been required to reflect the views of all eligible adults approached (ie all those sent information booklets by the Electoral Commission), the UK would still be a member of the EU. Quite rightly, the views of the 12.9 million eligible adults who chose not to vote were not reflected in the poll, which changed the course of modern history. This is how democracy works. In the words of Winston Churchill, “it has been said that democracy is the worst form of Government except for all those other forms that have been tried from time to time.”
- Beyond these broad observations, I contest the validity of several other implied criticisms of the survey made by the Applicant. Especially noteworthy is the emphasis it places on the response from Westonbirt Arboretum which it correctly describes as being “in support of the Scheme in principle” (3.3.12). Less correctly, the Applicant says this response “provides relevant contextual evidence when considering the potential effects of the Scheme on tourism and visitor-related businesses. It demonstrates that the views of businesses and visitor attractions in the area are not uniformly adverse and that the potential effects of the Scheme should not be characterised solely by reference to the concerns expressed by respondents identifying adverse effects.”
- The response from Westonbirt to SLD’s original questionnaire was accompanied by an unsolicited e-mail which demonstrated that the main reason for the Arboretum’s support for Lime Down is unrelated

to the socioeconomic considerations addressed by the survey. Westonbirt's email observed that "although your questionnaire is titled soci-economic [sic] I have also made environmental points as these are *the most material* to the arboretum and a fundamental point of solar projects as a medium term solution to our net zero journey." [SLD's italics]

- The arboretum's comments on the socio-economic impact of the project amounted to little more than a postscript to its main message. As the arboretum indicated that it would be happy for its response to be made publicly available, here are its comments in full:

"Westonbirt The National Arboretum is Europe's most complete tree collection and one of the finest arboretums in the world. Developed over nearly 200 years the arboretum holds over 1800 different species of tree, many that are threatened with extinction in the wild. The heritage tree collection is suffering from the rapidly cumulating impacts of climate change with three 'drought' years in the last 5 and an unprecedented number of days over 30 degree Celsius, and this July/August and unprecedented 34 day period without rain. There is an urgent requirement to reduce CO2 emissions and decarbonise our national electricity supply in order to arrest the growing level of greenhouse gases in the atmosphere and thus limit the future severity of climate change as soon as possible.

Solar projects such as Lime Down on relatively mediocre farmland and with largely reversible impacts are potentially an important stepping stone towards a more sustainable and balanced net zero world.

In addition to climate impacts on the tree collection the lack of adequate electric capacity in the local grid system is holding back investment in our own net zero technologies e.g. air source heat pumps and induction cooking as we seek to move away from gas and oil. Lack of electric supply may even prevent future investment in new infrastructure designed to sustain and grow tourism revenue."

- I recognise that Westonbirt has every right to comment on climate change, net zero and farmland. But these observations are largely irrelevant to the socio-economic discussion. The arboretum has had plenty of scope to comment on these considerations at various stages during the Examination process and, to the best of my knowledge, has chosen not to do so. I also note that Westonbirt arboretum was not among the approximately 5000 interested parties that submitted relevant representations on the Lime Down project.

- I also contest the opportunistic implications made by the Applicant about the likely impact of the Lime Down project on the 11 pubs that responded to the SLD survey. The Applicant notes that “of the eight pubs that were approached by SLD and provided responses stating that they expected a ‘negative’ or ‘severe’ impact and/or a decline in annual turnover, it is not clear from the survey how many of these pubs are already facing viability challenges and have the potential to face closure in the coming years even if the Scheme were not consented.” (3.3.10)
- This is an insensitive response. It appears to suggest that as pubs are facing an uncertain business outlook, an additional threat to their survival and to the role they play in local communities is scarcely worth worrying about. The reverse is true. If any or all of these pubs are “facing viability challenges and have the potential to face closure in the coming years” the last thing they need is another threat to their survival. The questionnaire specifically asked them to describe the possible effect of **Lime Down** on their organisation; not the likely impact of an economic downturn, rising labour costs or changing preferences among their customers.
- There is a material inaccuracy in paragraph 3.2.7 of the Applicant’s response. This comments that “the relatively high response rate achieved by SLD indicates a substantial level of interest in the Scheme amongst the businesses approached and demonstrates the benefit of SLD’s *established local relationships* and connections, *particularly where able to make follow up contact and in-person visits.*” [my italics]
- This implied criticism is based on unsubstantiated supposition rather than fact. The “follow-up” contact referenced here was made by two student volunteers with no “established local relationships” whose contribution to the research was based on cold calling. The “in-person” visits refer to the efforts of a Malmesbury resident who spent one day knocking on the doors of businesses on the town’s high street with which she had no “established relationship.” The suggestion that the responses elicited by these volunteers was the

product of privileged access is false. They were, quite simply, the product of hard (unpaid) work.

- The Applicant added in 3.2.7 that it recognises that “SLD has therefore been able to engage with businesses that may not otherwise have participated in a consultation exercise undertaken by the Applicant.”
- This comment is purely hypothetical because the Applicant was unable or unwilling (or both) to undertake a consultation exercise of its own. It had ample opportunity to do so, given that it is now more than 40 months since the Lime Down project was originally announced. It also has more than ample human and financial resources to do so, given that its owner employs more than 19,000 people worldwide and reported a net profit in 2025/2026 of A\$4.85 billion (£2.55 billion).
- The Applicant’s failure to produce an empirical survey of its own is indicative of the hollowness of its repeated commitment to gathering feedback from the local community.

No use of artificial intelligence (AI) has been made in the preparation of this note.

Phil Moore, October 8 2026