

Deadline 8 Closing Submission: Wider Planning, Public Interest and Applicant Accountability

Lime Down Solar Park – EN010168

January Farrington: IP Reference: [REDACTED] 16th October 2026

I spoke at the Open Floor Hearing on 21 April 2026. As this Examination draws to a close, I remain deeply concerned that the fundamental questions I raised have not been satisfactorily answered.

I support renewable energy. However, **I do not believe the Applicant has demonstrated that the benefits of Lime Down Solar justify the scale of harm it would cause to this area, its communities, businesses, landscape and environment.**

All concerns raised in my previous written and oral submissions remain and I do not consider that they have been adequately addressed by the Applicant. The fact that I have not repeated every issue in this Closing Submission should not be taken as acceptance of the Applicant's position. Please consider this Closing Submissions alongside all my previous representations and evidence.

1. What is the actual national benefit?

The Applicant promotes a 500 MW development capable of powering up to 115,000 homes. Yet its own response to the Examining Authority's Rule 17 request (EXAM/9.89, Table 1) predicts zero solar generation for 4,472 hours in a typical year, generation of no more than 50 MW for a further 1,492 hours, and generation above 500 MW for just 18 hours. **This means that for 5,964 hours each year, nearly 70% of the time, the solar panels are predicted to generate no more than 10% of the scheme's 500 MW grid export capacity.** These figures concern solar generation and do not include potential electricity exports from the BESS. Importantly, the BESS can also be charged using electricity imported from the National Grid, which may **include electricity generated from non-renewable sources**. Electricity subsequently exported from the BESS cannot therefore automatically be attributed to renewable generation from Lime Down. I believe this distinction is fundamental to understanding what the scheme will actually deliver and ensuring that its renewable energy benefits are presented accurately and transparently.

I recognise that solar generation is intermittent and that electricity generated below maximum capacity remains valuable. Nevertheless, these distinctions are essential when assessing the actual renewable energy benefits of a development of this scale against its considerable environmental and community impacts.

I am also concerned by the evidence submitted during Examination suggesting that the scheme's carbon payback period extends well beyond 2050. If that evidence is correct, it raises serious questions about the weight that should be given to its claimed contribution to the UK's net zero objectives. The Applicant's carbon assessment and assumptions deserve particular scrutiny.

Nationally significant infrastructure does not automatically mean that its benefits outweigh its harms. The actual benefits must be weighed against the consequences of this particular development.

2. Why this location, and was the selection genuinely open?

I have questioned the choice of this location from the outset. Lime Down would fundamentally change productive farmland, villages and the setting of the Cotswolds National Landscape for up to 60 years. The chronology is particularly troubling. The Applicant's own Grid Connection Statement (APP/7.5, paragraph 2.1.3) confirms that a Bilateral Connection Agreement for 500 MW export and 250 MW import capacity was entered into in July 2021. Its Land and Rights Negotiations Tracker (Rev 9) records that Heads of Terms with landowners had been agreed as early as 17 May 2022, with the corresponding option agreement entered into on 26 July 2023. Yet the community did not learn of the proposals until March 2024.

In March 2026, **Malmesbury** was named the **best place to live in the Southwest** by **The Sunday Times**, recognising its historic character, thriving local businesses and strong sense of community. This is not simply an attractive landscape on a map. It is a living, working community whose character and surroundings contribute enormously to what makes it special. I question whether the Applicant has given sufficient weight to what stands to be lost.

The Applicant's Site Selection Assessment Report (APP-185) confirms that land agents identified large landholdings with potentially willing owners. It also confirms that not all potentially suitable agricultural land was examined in detail. Crucially, it does not provide a clear dated chronology showing when the alternative PDAs were assessed or when PDA10 became the preferred location. How much had already been decided before consultation began? Was there a genuine opportunity for the public to influence the choice of location? The independent assessment by Marrons raises serious concerns about the selection methodology and whether credible alternatives were adequately considered.

Early commercial agreements should not be allowed to predetermine the location of infrastructure of this magnitude.

The Applicant repeatedly invokes urgency, delivery timescales and the need for a "proportionate" assessment. Proportionate should mean an assessment appropriate to the scale and consequences of the decision. It should not become a justification for examining alternatives less thoroughly because commercial commitments have already been made.

As Marrons observes, any failure to undertake adequate assessment earlier should not now be used to dismiss alternatives because reconsideration would cause delay. The consequences of selecting the wrong location could last 60 years. The responsibility for getting that decision right rests with the Applicant.

3. Have the harms genuinely been assessed on a worst-case basis?

Throughout this Examination, I have repeatedly heard the Applicant describe its assessments as "robust" and its predictions as representing a reasonable worst case. **I remain unconvinced.**

The assessments rely extensively on modelling, assumptions, the Applicant's 'professional judgement' and mitigation that will be developed further after consent. Important construction details remain undecided, baseline evidence has been challenged, and affected businesses have repeatedly questioned whether the assessments reflect what will actually happen on the ground.

A striking example is the number of solar panels. The Applicant's original transport assessment assumed 588,988 panels, subsequently increased to approximately 842,500, while SLD's transport expert estimates 917,381, potentially more (EXAM/9.54, TT2.1; SLD Deadline 7 Additional Transport Submission). This represents an increase of over 55% against the original assumption, with significant implications for construction traffic, materials and environmental impacts. I remain concerned that the Applicant has once again not demonstrated that its assessments reflect the reasonable worst case.

Flooding, construction traffic, noise, landscape change, impacts on heritage, wildlife, farming and local businesses will not occur in isolation. They will be experienced together, often by the same communities. I remain particularly concerned about the setting of the Cotswolds National Landscape. The fact that panels are outside its designated boundary does not remove the potential for serious harm to its setting and surrounding countryside. Continued objections from bodies responsible for protecting the landscape deserve proper weight.

Cleve Hill Solar Park in Kent provides a valuable opportunity to compare assurances made during an earlier solar NSIP examination with what has subsequently happened on the ground. I am concerned by the Applicant's reliance on other consented DCOs as supporting evidence when those schemes have not necessarily been constructed or operated. A previous consent is not evidence that predicted impacts or proposed mitigation have been realised successfully. Nor does it establish that the same conclusions are appropriate for Lime Down, with its particular scale, topography, sensitive landscape and established rural businesses. I have repeatedly asked for real-world evidence rather than simply accepting predictions. **The Applicant's models of predicted outcomes are not proof that those outcomes will occur, nor does identifying unproven mitigation demonstrate that it will work.**

4. Water, flooding and battery storage

Given the existing flooding of the Gauze brook alongside West Park Farm, I remain deeply concerned that the Applicant's assurances of no increased surface-water runoff from such extensive solar panel coverage have not adequately demonstrated how the risk of exacerbating flooding will be avoided.

I remain concerned about the proposed BESS, its proximity to sensitive groundwater and the practical implications of a major fire or other emergency. There are important questions about the protection of the underlying aquifer, firefighting water requirements, contaminated runoff, safety for rail passengers and the ability of emergency services to respond effectively in this rural setting.

I am also concerned about water availability for establishing and maintaining the extensive landscape mitigation upon which the Applicant relies. Screening and planting cannot be assumed to succeed without adequate water and long-term maintenance. *Photographs supplied by residents near Cleve Hill appear to show areas of failed mitigation planting. This raises legitimate questions about how reliably landscape screening can be established and maintained over time.*

I have not seen evidence demonstrating that Wessex Water, as a local water supplier, has been directly involved in addressing these issues. This leaves me concerned about whether the availability of water for mitigation, the protection of groundwater resources and the practical requirements of an emergency response have been adequately established.

5. Consultation, compulsory acquisition and accountability

Nearly 5,000 Relevant Representations were submitted. While numbers alone cannot determine the planning outcome, they demonstrate the strength and breadth of public concern. In my experience, the Applicant's approach has too often appeared defensive and dismissive. Important information has been misunderstood, corrected late or disputed, while residents have devoted extraordinary time and resources to obtaining independent evidence and challenging the conclusions presented. I believe an Applicant seeking powers of this magnitude should be expected to demonstrate the highest standards of accuracy, transparency, fairness and professionalism. **In my experience, the Applicant has not met those standards.**

The compulsory acquisition powers sought are particularly troubling. Landowners along the lengthy cable route face the potential imposition of rights over their land to facilitate a privately promoted development. I understand that Heads of Terms remain unsigned with the landowners along the cable route, despite continued negotiations. This lack of voluntary agreement reinforces my concern about the extent of compulsory acquisition powers being sought. I do not believe the Applicant has adequately demonstrated why all the land and rights requested are necessary, why less intrusive alternatives are insufficient or why the public interest justifies imposing these powers upon unwilling landowners.

Unlike most NSIP infrastructure whose location is largely dictated by an existing road, railway or crossing, a solar development involves substantial choices about where land is assembled. Those choices deserve particularly careful scrutiny when the Applicant subsequently seeks statutory powers to secure the remaining land.

6. The human cost and the planning balance

For 40 years this landscape has been part of my life, first with my grandparents and parents and now with my husband and children. The past few years have involved enormous uncertainty, missed time with my family and considerable personal and financial sacrifice. Communities have had to raise substantial funds to obtain independent professional advice simply to challenge the Applicant's evidence on a more equal footing and assist the Examining Authority. I do not raise this to seek sympathy. I raise it because there is a profound imbalance between a commercially resourced developer seeking extraordinary statutory powers and the people who must live with the consequences.

The Applicant's treatment of displaced agricultural workers illustrates this imbalance. Its suggestion that those losing their livelihoods could be offered retraining for alternative employment (EXAM/9.22; EXAM/9.86) demonstrates, in my view, a fundamental lack of understanding of the people affected. Farming is not simply a transferable occupation but a skilled profession, an established livelihood and, for many, a way of life. The offer of retraining does not compensate for the loss of a livelihood which those affected have neither chosen nor wished to surrender.

A recurring concern throughout this Examination has been the gap between the Applicant's conclusions and the evidence relied upon to support them. Important shortcomings in assessments of equine businesses, construction traffic, water resources and the deliverability of landscape mitigation have only been exposed or examined more fully following challenges from Interested Parties and the Examining Authority. In some cases, the cited research does not substantiate the conclusions drawn from it; in others, fundamental assumptions and

practical requirements remain insufficiently demonstrated. Taken individually, these might be presented as technical shortcomings. Taken together, they raise a much more serious concern about the reliability of the assessments upon which the claimed benefits, predicted impacts and proposed mitigation depend. I respectfully ask the Examining Authority to consider this cumulative pattern when determining the weight that can safely be placed upon the Applicant's evidence.

I recognise the national importance of renewable energy. But we should be seeking to deliver it as efficiently as possible, with proper regard to the electricity generated, the land required and the environmental consequences. The need for renewable energy does not remove the responsibility to choose locations carefully, assess the full consequences honestly and demonstrate that the benefits justify the harm. **I do not believe the Applicant has met that responsibility.**

Conclusion

The questions I raised at my Open Floor Hearing remain unanswered.

Why this location? Why this scale? What is the actual national benefit? Have the worst case impacts truly been assessed? What real world evidence supports the proposed mitigation? And who will be accountable if the assurances prove wrong?

I respectfully ask the Examining Authority to give proper weight to the cumulative harm to the landscape, productive farmland, heritage, water resources, wildlife, established businesses and communities. The existence of an assessment does not establish that its conclusions are correct. Repeated assurances that an assessment is "robust" do not make it so. Nor should the promise of future mitigation be treated as proof that harm will be prevented.

In my view, the Applicant has not demonstrated that the public benefits of Lime Down outweigh its considerable adverse consequences, or that a less harmful location has been properly ruled out. **I therefore ask the Examining Authority to recommend that development consent is refused.**

We only have one opportunity to make this decision properly and responsibly. The people who live here, and the generations who follow, deserve nothing less.

Deadline 8 Closing Submission: Equine

Lime Down Solar Park – EN010168

January Farrington IP Reference: [REDACTED]

16th October 2026

Equine Impacts

Has the Applicant demonstrated that the impacts of this development upon horses, the people handling them and the businesses dependent upon them have been properly understood, assessed and mitigated? **In my view, it has not.**

I have spent this Examination providing evidence about West Park Farm, a commercial Thoroughbred breeding business directly adjoining Lime Down D. I have also sought to demonstrate the extent of the wider equine community affected by this scheme. My concern is not that the Applicant has failed to produce enough paperwork. It is that, despite recognition of substantial new evidence, corrections to its original assessment and repeated challenges to its assumptions, the Applicant continues to conclude that there will be no significant adverse effects. **The evidence has changed. The conclusion conveniently has not.**

All concerns raised in my previous written and oral submissions remain and I do not consider that they have been adequately addressed by the Applicant. The fact that I have not repeated every issue in this Closing Submission should not be taken as acceptance of the Applicant's position. I respectfully ask the Examining Authority to consider this Closing Submissions alongside all my previous representations and evidence.

1a. An incomplete understanding of the businesses affected

In April 2024, my husband wrote directly to the Applicant explaining that [REDACTED] was a commercial Thoroughbred stud, identifying our horses, employees, international clients and concerns about the development. Many other Interested Parties also raised equine concerns. Despite this, the Environmental Statement incorrectly described our business as just a livery operation and the Applicant's project lead subsequently indicated at a hearing that he had not been aware of the nature of our business.

This was not information the Applicant lacked. It had been provided directly to the Applicant many times before the Environmental Statement was finalised yet was not properly reflected in its assessment. Even after acknowledging the true nature of [REDACTED] (during the examination), the Applicant continues to classify it as a medium-sensitivity receptor. **I strongly disagree.** A specialist Thoroughbred stud, caring for broodmares, foals and valuable young stock belonging to international clients, cannot be assessed adequately through this generic classification of equine businesses.

The wider assessment raises similar concerns. More than 400 Relevant Representations raised equine issues, yet the Applicant's understanding of the affected equine setting and economy has remained wholly incomplete.

The questionnaire distribution list has still not been disclosed, making it impossible to establish who was actually consulted and why so many existing IPs have not been included. The revised report adds a few further businesses but does not resolve concerns about the completeness of

the exercise. As an example, the Applicant's desk based research failed to identify established local equine businesses such as Grant Barnes & Son, a long established and widely recognised independent saddlery located in Malmesbury (keeping traditional leather working techniques alive into the 21st century). The applicant did, however, identify a comparable business referred to as 'Cirencester Saddles' located over 20 km from the sites. Other local equine operations and many existing IPs appear to have been omitted, and I continue to question the exclusion of Estcourt Stud on the basis of the 5 km study area, which I believe it sits within.

The completed IGP questionnaires that I have viewed clearly demonstrate the diversity and complexity of these businesses, including breeding, veterinary treatment, competition horses, foaling and emergency services. Identifying a business is not the same as understanding its operations and receiving just a questionnaire is not the same as assessing its impacts.

1b. The Equine Business Report: more information, but no reliable reassurance

I am concerned by the considerable weight now being placed upon the Applicant's Equine Business Report (EXAM/9.62). The report has been revised repeatedly during Examination and now describes a much more substantial and complex equine economy than was recognised in the original Environmental Statement. In many respects, it confirms what Interested Parties have been explaining from the beginning. However, the central weakness remains. At paragraph 4.1.8, the Applicant acknowledges that limited quantitative information was obtained from its questionnaires, that professional judgement was required and, most importantly, that the sensitivity of individual businesses was not directly assessed.

How, then, can the report reliably conclude that the impacts upon those businesses will not be significant?

The Examining Authority raised this very issue at ISH8, questioning the basis for dismissing potentially significant effects upon client confidence when those effects could not be quantified. The Applicant's answer was again professional judgement. I do not question the legitimate role of expert judgement. I question the evidential basis for relying upon it here, particularly when affected businesses have submitted detailed first hand evidence that challenges the Applicant's assumptions.

The report now contains significant criteria referring to loss of clients, reduced horse numbers, changes in turnover, increased costs and disruption to operations. Yet I cannot identify a convincing application of those criteria to the actual commercial circumstances of West Park Farm or other directly affected businesses.

The EBR may provide a useful description of the equine sector and potential impact pathways. What it does not provide is a sufficiently evidenced basis for the reassurance that significant adverse effects can be ruled out. Its length, repeated revisions and professional presentation should not be mistaken for the strength of its conclusions. I also question the basis upon which veterinary opinions about horse behaviour have been translated into conclusions about client retention, financial losses and business viability, without a clear assessment of the commercial circumstances of the businesses concerned.

I remain unclear who has taken responsibility for assessing the actual circumstances of West Park Farm. The veterinary expert has not visited or consulted us, while the report's authors acknowledge that individual business sensitivity has not been directly assessed. Yet the

Applicant asks the Examining Authority to accept that the effects on our horses, staff, clients and commercial viability will not be significant. **I do not believe that conclusion is adequately supported by the evidence presented.**

2. Assumptions about horse behaviour remain inadequately supported

I remain particularly concerned by the Applicant's reliance upon [REDACTED] opinions concerning habituation, disturbance and distance. [REDACTED] has neither visited nor directly consulted with any of the affected equine businesses. We first became aware of [REDACTED] involvement when the Equine Business Report was produced at Deadline 6. [REDACTED] conclusions must be considered alongside the evidence submitted by recognised equine vets including [REDACTED]

The Applicant suggests that movements of people, noise, 4.5m tracker panels or construction machinery beyond 30 metres are unlikely to elicit a response, while its proposals for highways and public rights of way rely upon a 15 metre separation, with some permissive routes closer still. These distances concern different activities, but I have not seen convincing evidence demonstrating that either provides adequate protection against the actual noise, vibration, moving machinery and visual disturbance associated with this Scheme.

A horse's flight zone is a handling concept. It is not a scientifically established boundary beyond which disturbance becomes harmless. The assumption of habituation is equally problematic. Horses may become accustomed to a particular stimulus, but that does not establish that they experience no physiological stress and nor does it address the continually changing population of a commercial stud. Mares arrive, foals are born and young horses leave or enter training and sales preparation.

The evidence submitted by Dr Farrington specifically challenges the assumption that outwardly calm behaviour necessarily demonstrates the absence of stress. **I remain unconvinced that these issues have been adequately answered.**

3. Construction Noise and the inadequacy of residential receptor assessments

I remain concerned about the provenance and reliability of the baseline noise data. On 12 October 2023, I discovered a sound-monitoring device attached without permission to our fencing and provided a date-stamped photograph in my Written Representation. The Applicant has since acknowledged that the device was attached to the wrong fence (it is not a boundary fence as suggested) through human error (JF-029, EXAM/9.22).

The Applicant's baseline survey reports measurements at LT13 from 12–17 October 2023, yet Figure 14-1-1 shows LT13 at a different location, inside the Scheme boundary. These dates coincide with the misplaced monitor incident. I have seen no clear explanation of whether that device contributed to the published LT13 measurements, whether it was relocated, or how the reliability and representativeness of the data used to assess West Park Farm (R14) were established.

The Applicant's own Environmental Statement, Chapter 14, Table 14-18, predicts construction noise of 56 dB(A) at West Park Farm (R14), compared with a Lowest Observed Adverse Effect Level of 45 dB(A). The predicted construction noise is 11 dB above the applicable human-receptor LOAEL, yet the Applicant concludes that the effect is not significant because it remains below the threshold adopted for significant adverse effects on human receptors. Table 14-20 also predicts night-time drilling noise of 48 dB(A) at R14 during the Gauze Brook 1 crossing, exceeding the Applicant's own night-time Significant Observed Adverse Effect Level of 45 dB(A). These are predictions at the farmhouse, rather than at the occupied paddocks considerably closer to the proposed works. They do not establish the effects on the broodmares, foals and young Thoroughbreds occupying these closer paddocks and stabling. Nor do the additional equine noise contours demonstrate that the predicted exposure is acceptable for these animals.

My concern is that the Applicant has modelled noise without adequately establishing what those levels mean for a commercial Thoroughbred stud, its horses, its staff or its ability to continue operating safely. The evidence of potential disturbance is contained within the Applicant's own assessment. The unresolved question is why that evidence has not resulted in a materially different conclusion about the impacts on West Park Farm.

The Applicant's Noise Modelling Appendix (REP5-063) confirms that its construction-noise assessment relies on representative activities and assumed construction equipment because the detailed construction methodology was not yet available. There needs to be a clear distinction between providing a model of predicted noise and demonstrating that the resulting effects upon horses have been adequately assessed. The former has now been provided. In my view, the latter has not.

The Applicant has also proposed temporary noise screening near equine receptors where practicable. Given West Park Farm's elevated position and extensive views towards Hullavington and Bradfield Manor, I question how effective such screening could be. Its installation would also introduce additional works and potential disturbance along our boundary. Its precise location, material, effectiveness and potential to introduce additional movement or noise in windy conditions have not been satisfactorily demonstrated to me. **Screening should not be accepted as effective mitigation simply because it has been proposed.**

4. The proposed mitigation transfers the burden to existing businesses

The Applicant repeatedly suggests advance warning, altered turnout, moving horses between paddocks, additional supervision, temporary screening and adjustments to construction activities. These measures may appear reasonable on paper but are not necessarily practical for a working Thoroughbred stud.

We cannot simply move broodmares, foals, colts, fillies and youngstock wherever convenient. Paddocks have specific uses. Grazing and pasture rotation are carefully managed. Veterinary treatment, foaling and essential husbandry cannot always be rescheduled. Moving horses and increasing handling can itself introduce risk, particularly when staff are dealing with young or reactive animals.

Much of the mitigation is qualified by expressions such as "where practicable", with details left to future management plans and contractors. I ask the Examining Authority to distinguish

between mitigation that is genuinely secured and effective, and measures that depend upon the affected business absorbing additional costs, disruption and responsibility. Moving the horse does not remove the impact. It transfers the disruption, safety, additional cost and responsibility to the business that is already there.

5. Commercial consequences and client confidence

Our business depends not only upon the physical welfare of the horses but upon our own confidence and that of our owners who entrust valuable bloodstock to our care. I have submitted evidence that a client is actively seeking alternative accommodation for ten mares and their foals because of concerns about this development. Those horses have not yet left, but the risk to our business is no longer merely theoretical. Sue Godwin has separately explained that losing just one horse would represent at least 5% of her business income.

The Applicant has acknowledged the relevance of client confidence and business sensitivity but has not demonstrated how such losses have been meaningfully reflected in its significance assessment. **A business does not have to experience an accident or close completely before suffering significant adverse effects.** For a commercial Thoroughbred breeding operation, uncertainty, loss of client confidence, changes to management practices and decisions to relocate horses can have serious financial consequences long before any business ceases trading. Dismissing these concerns as merely perceived risks fails to recognise how commercial decisions are made and how business viability can be undermined.

6. Where is the real-world evidence?

Throughout this Examination, I have asked for evidence demonstrating that comparable commercial equine operations can continue safely and successfully immediately alongside construction and operational tracking solar arrays of this scale. The Applicant refers to Gooromon Park at Wallaroo as an example of coexistence. However, when I contacted its operator, I was told that construction had not yet begun. It therefore cannot provide real-world evidence that a comparable equine business has successfully operated through construction or that the proposed mitigation has proved effective.

The deficiencies in the Applicant's Equine Business Report (EXAM/9.62) extend beyond its failure to engage directly with affected businesses. I am deeply concerned by the quality and relevance of the scientific evidence relied upon to support its conclusions, particularly the proposed 30m flight-zone threshold. The Applicant cites Canadian guidance on approaching and handling horses which does not specify a 30m distance, alongside research examining horses' responses to approaching people rather than construction noise, machinery, moving solar infrastructure or prolonged disturbance. As Dr Annemarie Farrington has demonstrated in her submissions, these sources do not substantiate the conclusions the Applicant has drawn from them or establish that the proposed mitigation will adequately protect commercial Thoroughbred breeding operations. This is not a minor technical disagreement. **It raises serious concerns about the reliability of the EBR and the weight that can reasonably be placed upon its findings.** I respectfully ask the Examining Authority to scrutinise whether the evidence cited genuinely supports the Applicant's assessment of equine impacts, particularly noise, disturbance, dust, safety and the adequacy of mitigation. In my view, the EBR has failed in its essential purpose of providing a robust, site-specific assessment demonstrating that the risks to equine welfare, safety and business viability have been properly understood and addressed.

At ISH8, Ms Powell, a co-author of the EBR but not an equine specialist, referred to experience from other DCOs when defending the Applicant's conclusions. The Examining Authority requested supporting information if that experience was being relied upon. I have not identified subsequently submitted evidence of monitored outcomes from comparable completed schemes. I therefore question the weight that can reasonably be placed upon this reassurance.

The Applicant's final EBR introduces additional business listings, significance criteria and construction-noise contours. They do not demonstrate that the proposed mitigation will work in practice or that individual businesses can absorb the consequences. **The report is most useful in identifying the potential impacts but far less convincing in demonstrating why those impacts should be considered insignificant.**

7. The question the Examination must answer

I support the need for renewable energy, but that does not remove the Applicant's responsibility to demonstrate that this development can coexist safely with the established equine businesses surrounding it.

The Applicant has had repeated opportunities to address these concerns. It has received detailed first-hand business evidence, veterinary submissions, completed questionnaires and questions from the Examining Authority itself. Yet important assumptions remain unproven, the practical effectiveness of mitigation remains uncertain, and the conclusion of no significant adverse effects remains substantially unchanged.

It is important to consider the cumulative effects upon equine welfare, handler safety, business viability, rural road access and the environment upon which these businesses depend. Above all, I ask that the conclusions of the Equine Business Report are not given greater weight than the evidence supporting them justifies.

The absence of a quantified loss is not evidence that no loss will occur. Nor should the absence of a directly assessed business impact be treated as evidence that the impact will be insignificant.

The evidence has changed, the Applicant's conclusions should have changed with it.