

Submission ID: S52442BA8

These are the speaking notes for the oral comments of Easton Grey at OFH 1, the comments on the Applicants response to Easton Grey's Relevant representations and a summary.

The Parish of Easton Grey supplemental comments Summary  
26th April 2026

## **Summary**

### **Preliminary points**

The Parishes Relevant Representations are repeated and expanded by our additional written comments.

### **Disparity of resource**

The Parish had a £825 annual precept, (now raised to £1,500) versus the Applicants' £1 billion, one volunteer Chairman versus multiple employees and hired "experts".

However, the Parish has reliable local knowledge of its own community, landscape, environment, and flood risks coupled with commonsense. Accordingly, the Examining Authority are requested to ask the Applicant the pertinent questions we highlight in our written comments.

### **Land Use, Landscape and Visual**

Parts of our Parish will have directly impacted sight lines. The beauty of Easton Grey, a conservation area and Parish within the Cotswold National Landscape, will have its setting assailed by the adverse impact of two storey high panels. All residents and visitors to and from our village and our scheduled monuments or listed buildings will have to go past these panels. Without justification, the fields to be covered are high quality and versatile agricultural land.

Much loved Rights of way, used by walking, cycling or horse-riding members of our community and its visitors, will be blighted, not least by the tunnel effect and noise of the proposed development. The benefits to mental and physical health and tourism will be severely disrupted or just ruined. Falls in property prices, or an inability to sell will cause mental and financial distress.

### **Cultural Heritage, Tourism, Noise and Vibration**

The Applicants make bold and highly dubious assertions, with questionable bases of assessment. The tourism assertions are at odds with the size and numbers, communities and businesses affected. For example, we have a country hotel and local pub whose businesses will suffer adverse, if not existential, financial impacts.

### **Traffic and Transport**

Displaced traffic, to and from Malmesbury and Sherston, will be pushed onto the single-track road between Norton and Easton Grey. This road has a highly dangerous

crossroads and junction for a designated cycle route. We do not understand how cable routes will be taken under roads, motorways and railways or what disruption will be caused.

### **Decommissioning**

Absent, for example bonded guarantees, criminal sanctions or claims for breach are both toothless and prohibitively costly for the relevant entities and taxpayers to enforce. The Bank behind this applicant has a [REDACTED] whilst the Applicant itself is only a SPV of [REDACTED] and offshore owners.

### **Hydrology and Flood risk**

The Applicants responses demonstrate ignorance, or a misunderstanding of the comments being made and the landscape impacted. The 1.8 million square metres of panels seem designed to concentrate water towards places that already flood or are very prone to flooding. All the examples we identify for the adverse effects of run-off are the highest risk Flood Zone 3. The critical rail route to Wales that sits in a cutting though the site is already noted as high risk due to climate change. The Applicant addresses the security of their assets with an apparent disregard for the run-off flood risk to homes and sewage systems being born by the community that will not benefit from the scheme.

### **Conclusion**

Lime down is the wrong scale and in the wrong place. The harm caused will be substantial and permanent.

26.4.26

## Lime Down Solar Park (“**Lime Down**”)

### **Parish of Easton Grey’s** supplemental comments to Lime Down’s written response dated 9.3.2026 [PDA 009]

The purpose of this statement is to repeat and add to the Parishes responses to both the Statutory Consultation (9.3.25) and targeted consultation (8.7.25) (excluding attachments copied as annex 1 and 2 below) and now the 7 pages of Relevant Representations made by the Parish of Easton Grey dated December 2025 (allocated a reference EGPM-001 to -014 by Lime Down). We reference the earlier responses to statutory consultations since many of the points raised there remain unanswered and the Plan as submitted simply, by omission, did not deal with the points. This statement refers to, and comments on, the Lime Down (the “**Applicant**”) 30 page (excluding the thousands of pages of referenced documents) response. That response appears at pages 1702 to 1733 of [table 5-15 RR1220].

The Grid references and place names are, in this document, taken from the OS Explorer map 168 for Stroud Tetbury and Malmesbury.

The Applicant’s response comes across as both patronizing and dismissive of the well-founded concerns of our community. Many parts of the response, and referenced documents, are difficult follow and full of abbreviations, acronyms and other technical jargon. The Applicant condescends to an acknowledgment that we as a Parish “may not have access to specialist expertise” and refers us to EA Volume 4, Non-Technical Summary a document that, excluding all the other material referred to, is itself in excess of 140 pages. It is to that document that we will primarily refer in understanding the Applicant’s response.

As a Parish we are struggling to cope with this highly iterative process not least due to our lack of resource in comparison to those of the Applicant. To put the disparity of resource between the Easton Grey Parish Meeting and the Applicant into perspective we note the following. The Applicant, with no real assets itself, is however ultimately funded by an investment fund that has in excess of £1 billion to promote, but probably not build, this and other schemes. By contrast the Easton Grey Parish’s only source of funds was a precept of £825 per year. As will be seen in the next set of accounts, that we will file, this precept has been raised to £1,500. This is to enable the parish to contribute to Wiltshire County Council in part for completed flood relief measures to the road by our bridge and additionally for signage aimed at reducing the traffic that already exists. These funds are thus already earmarked for these measures without any resource to deal with this Scheme. Having almost doubled the precept to meet non-lime down challenges we cannot raise it again. Even if we did it would never be enough to deal with this. That disproportionate financial resource is mirrored in the number of people and available time between the Parish and the Applicant. We have no employees and have only a volunteer Chairman who doubles up as Treasurer. However, we do have an abundance of local knowledge of our home environment and its history, including weather and flood patterns. We do have common sense. We are not hired “experts” paid to give views and opinions that the Applicant needs to express however flawed and

unsustainable they are. We also hope to make up for this deficit by asking the Examining Authority to ask the questions (highlighted in bold below) of the Applicant, the answers to which questions the Examining Authority will need to have in considering this application.

In addition to asking the Examining Authority to ask questions of the Applicant we also have some observations by way of example on matters where we think the Applicant is, either not answering the point raised or talking nonsense. We note that the "Applicant acknowledges that there will be impacts on the community.....which may be a source of concern for local residents" but this misses by a country mile the extent of harm this Scheme, if implemented, will do to our and other communities. We are already seeing asking prices for properties adjacent to the Lime Down dropping by up to 25% and still not selling this will cause mortgage renewal problems. Even more distressing is properties that need to be sold due to divorce or death which seem to be unsellable even now with the uncertainty alone. This causes great financial distress and mental health issues.

### **Land Use, Landscape and Visual**

In total Lime Down propose erecting in excess of 1.8 million square meters of solar panels that are two storeys high. These are spread out into 5 separate areas of congregation covering an area that is 10 x 5 kilometres. That is 50 square kilometres of land that stands as a gateway to the Cotswold National Landscape.

In our community those who occupy the houses called The Plain and probably The Plain Farm will suffer long term visual effects from the panels by the road between the splash at Norton and the crossroads at The Plain Farm. From the right-angle bend in the road at grid ref 880 857 even at ground level, the panels in those fields will be visible from parts of Malmesbury. This road is the main route for those visiting or leaving the village from or towards Norton and the M4 beyond. The village of Easton Grey is a Conservation Area and within the Cotswold National Landscape.

These panels are within 300 metres of the start of the Cotswold National Landscape and will have a horrible visual impact on all those that use the Fosse Way. The Fosse Way is made up of both metalled highway and unmade track a point that the Applicants and their experts appear to be unaware of or choose to downplay in their responses. The Fosse Way is in parts a scheduled monument. This is the case in relation to Easton Grey where the area of the settlement at the crossing of the Avon is a monument scheduled under the Ancient Monuments and Archaeological Areas Act 1979 and listed in 1994 under the number 1011635. Likewise, the village bridge is Grade II listed, Entry Number:1356034 and much visited by tourists and residents alike. The village also has other listed buildings.

In terms of Land use those fields around Easton Grey, Area B, upon which it is proposed to place the panels are mostly, on the Applicants own evidence, of the best and most versatile of agricultural land subgrade 3a with a small amount of subgrade 3b. So far as we have been able to discern the Applicant has put forward no justification as to why

this is necessary. [see Overarching National Policy Statement for Energy (EN-1) at 5.11.34]. The same comment pertains to the land in Area D. See the Agricultural Land Classification Mapping at APP-172 <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010168/documents>

In addition, and again by way of example to the parts of the Scheme nearest to Easton Grey, Alderton and Sherston, the following public rights of way which are much used by the community and visitors will be rendered ghastly. 1) The Bridleway from Lordswood Farm to the Sherston roads, 2) The 1 plus km. of by way that extends from Commonwood Lane to the motorway, 3) those numerous footpaths that join what is the triangle formed between Sherston, Alderton and Farleaze farm 4) the designated cycle route that runs between Malmesbury, through Foxley, to Sherston and 5) by way of final example the footpath that joins Foxley and the Vine Tree pub at Norton. The latter is a vibrant local community pub with a hard to come by reputation for food and hospitality. How the Applicant in its Landscape and Visual Impact assessment can conclude that they can minimise the number of locations that will be visually impacted is a mystery. To state that the effect will be mitigated by year 15, the equivalent of a life sentence in jail terms, is as extraordinary as it is in any event wrong in relation to the examples identified. To say that on the basis of these unsupportable claims a panel height of 4.5 meters is “not considered excessive” is just nonsense.

In summary the back roads and much-loved Rights of way used by walking, cycling or horse-riding members of our community and its visitors, will be blighted, not least by the tunnel effect and noise. See for example the Athelstan’s Pilgrims way which criss-crosses the Area of Lime down Solar with walking and cycle routes please see the [athelstanpilgrimway.org](http://athelstanpilgrimway.org) website and also the [Komoot.com](http://Komoot.com) website and the cycling around sherston section . The benefits to mental and physical health and tourism will be severely disrupted, curtailed or just ruined. In addition, as already noted the effect on property values and the prospect that a required sale is required and may not be possible at all is and will cause huge distress.

The Applicants reference “Mitigation measures to address landscape and visual effects are set out in ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and secured within the Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time”

**These are only plans. How can the Examiners be sure that these proposals will be fulfilled and, importantly, that new trees and hedges will flourish?**

**The applicant is an SPV with ultimate ownership being a fund which will not bear responsibility, which is anyway unlikely to develop but to sell, probably to an offshore company. What safeguards are there to force an ultimate owner to**

**comply with terms in a DCO, will they have the resources to do so and who will be responsible to take enforcement measures?**

The Applicants also state that "Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area."

Can the Examiners please question this and ask; **How can land which is under tons of concrete with deep piles be returned to its original use and condition?**

The comments we make concerning walking, cycling and horse riding also, again by way of example apply to the back road between Alderton and Sherston. As a snapshot of the usage, we attach images below that were taken on Friday 24<sup>th</sup> April between 10.45 and 11.00 am on a morning exercise ride from a yard in Luckington. In that short time window, we saw two parties of cyclist, one runner and one collection of birdwatching walkers. The views are as follows:-

- 1) From grid 846 840 looking SEE to Area C Horseriders
- 2) From grid 849 843 looking NE to Area A Horseriders and walking birdwatchers foot path to left
- 3) From grid 852 849 looking SSE to area C Horseriders
- 4) From grid 852 846 looking SSE to area C Horseriders and cyclists
- 5) From grid 852 846 looking East to Area A Horserider







It is also worth noting that at this time of year the hedgerows that have been established for generations abound with birds and other wildlife, not least Yellow Hammers.

### **Cultural Heritage**

Under the heading of Cultural Heritage, the “Applicant Notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. This dubious statement is repeated in other places, and **we would ask that the Panel ask whether that statement is correct.** If at the time the statement was made it was not correct, then that calls into question the veracity of the statements made by the Applicant elsewhere. So far as Easton Grey is aware no Statement of Common Ground has been agreed with Wiltshire Council. In addition, why have Easton Grey not been consulted?

### **Tourism**

Under the heading of Tourism, the Applicant asserts that they assess a long-term loss of jobs at 11 and a short-term loss at 50. For example, we have a country spa hotel and a local pub whose businesses will suffer adverse, if not existential, financial impacts. Can the Examiners please ask **how these figures are assessed, i.e. on what evidence is this conclusion based?**

This estimate appears to be far too low and most probably stems from assumptions that are at best highly questionable or just wrong. The extent of farmland, farms, equine, pubs, and hotels and other businesses implicated are considerable.

No detail is provided concerning “alternative operational and management opportunities”.

Can the Examiners please ask **what these operational and management opportunities are, how they will be filled by the local community, not least by those that will lose their jobs?**

### **Noise and Vibration**

Under the heading of noise and vibration the Applicant, see "Construction Environmental Management Plan [APP-277], concludes that “no significant effects from construction noise or vibration are expected.

Can the Examiners please ask **how the Applicant can they justify saying there will be no significant effect when they are installing 600,000 piles plus other infrastructure?**

### **Traffic and Transport**

Displaced traffic, to and from Malmesbury and Sherston, avoiding the routes being used in construction will be pushed onto the single-track road between Norton and Easton

Grey. This road is already suffering from increased traffic and is falling apart in many places. In addition, there is with a highly dangerous crossroads at Plains Farm. That crossroads has already experienced near fatal accidents, and this can only get worse. This crossroad is also the junction for a designated and much used cycle route on the road that runs from Malmesbury, through Foxley, to Sherston.

Despite asking for details, in responses to the targeted consultation, in relation to the Applicants intentions and methodology on how they will lay cables we still have no details and whether this will include road closures. This is a sensitive matter for the roads in our parish as, save for the B4040 they are all single track with many blind corners and summits. Bland references to method statements and details yet to be produced makes it impossible to comment or take a view on what is actually being proposed.

### **Decommissioning**

Under the heading of decommissioning the Applicant states “Should the Scheme change ownership before the decommissioning stage any new owner remains bound by the commitments and obligations set out with in the DCO and associated management plans”. There are similar statements elsewhere but as Easton Grey Parish noted absent financial security criminal sanctions or claims for breach are toothless. Absent, for example some sort of bonded guarantees, there is no real enforcement mechanism and, to the extent that it proved necessary, any enforcement would be a burden on the Wiltshire County Council or the police and CPS and therefore ultimately the taxpayers including local council taxpayers. The Bank behind this applicant has a [REDACTED] whilst the Applicant itself is a SPV with [REDACTED] and owned by overseas investors rendering enforcement a “mirage” in any event.

### **Hydrology and Flood Risk**

What the applicant references as EGPM 003 Hydrology, Flood risks and drainage the Applicant’s comments disclose what seems to be either ignorance or a complete misunderstanding of the points set out in the Eason Grey Relevant Representations.

Our area is prone to flooding on an annual basis and frequently more regularly than that. We can and do monitor when flooding is likely by observing the height and flow of water through the many ditches and small watercourses that criss-cross our countryside and flow by multiple routes into the River Avon. The proposed development seems to be designed to direct water concentrations towards areas that already regularly flood or are very prone to flooding. It is as well to give some commonsense examples of where the built environment that has been in place for generations to mitigate this concentration of water. The extent of high-water events is monitored in our area at the Fosse Way measuring station (just downstream from Easton Grey) and the regularity and extent of flooding is subsequently mimicked by the peaks recorded at that measuring station. Our area along the river Avon is in the highest flood zone bracket (see

the flood map for planning Gov UK website) and many of those areas identified as Flood Zone 3, flood annually already.

#### Example 1

On the Macmillan Way National Trail by Luckington Manor at grid 839 841 the route sits on top of a walkway raised by a metre plus along a length of some 30 meters so as to make the path accessible on those frequent occasions when the water rises. Flood Zone 3.

#### Example 2

On the B4040 road at grid 844 850 midway between Sherston and Luckington the riverbank has been raised, most recently with Gabion Baskets filled with stone, to mitigate those frequent occasions when the water rises and would otherwise render the road impassable. Flood Zone 3.

#### Example 3

On the Macmillan Way National Trail where it reaches Sherston at grid 851 856 there is a flood defence around the retail unit to mitigate those frequent occasions when the water rises and would otherwise render the retail unit unusable. Flood Zone 3

#### Example 4

On the Norton side of the bridge in Easton Grey at grid 880 873 during recent road works construction took (see the Easton Grey flood plan dated 30.9.24). That construction includes the provision of dropped curbs to the roadway to allow the water to overflow round the bridge and over the road. This is to mitigate those frequent occasions when the water rises and would otherwise render the road impassable. It is also in place to mitigate the risk of flooding to those properties and sewage plant identified in the Easton Grey flood plan. Flood Zone 3.

#### Example 5

At the road junction by the Norton Splash at grid 886 844 there is a raised stone walkway and bridge so as to at least make a footpath accessible on those frequent occasions when the water rises and renders the road itself impassable. This is on the main road access for the residents and visitors of Easton Grey going to or from the M4. Flood Zone 3.

#### Example 6

The Mill, by Cowage Farm in Foxley at grid 903 863 has flooded in recent years despite efforts to try and mitigate the flood risk, the adjacent footpath and Bridle way are also frequently rendered impassable. Flood Zone 3.

#### Example 7

The road between Norton and Bradfield Manor around grid 895 835 frequently floods in two places (also of note the panels at this point are proposed on land that is the best and most versatile of agricultural land Subgrade 3a). The road is regularly impassable to

vehicles other than SUVs with a higher wheelbase. Frequently cars break down having attempted to pass through this flood area. This is on the main road access for the residents and visitors of Easton Grey going to or from the M4. It is identified as a long-term flood risk see the technical map on the GOV UK website check your long-term flood risk.

#### Example 8

The railway line between Bradfield Manor at grid 895 828 and the tunnel by Broadmead Covert at grid 849 825. This is a key transport route to Wales and is identified as a long term flood risk with the highest rating again see the technical map on the GOV UK website check your long-term flood risk.

In addition to the above the Examiners will need to take account of those places where there is frequent flooding in and around Malmesbury (not least in the area of the mills and homes around St John's Bridge and Street), the Somerfords, Gauze Brook and Gabriels Well where those living locally will have far better information than appears to be available to, or is ignored by the Applicants "experts" whose principal or only concern appears to be to ensure that their solar PVs and infrastructure is not impacted.

The Applicants Non-Technical Summary states that the scheme has been designed as "*far as practical*" to avoid and reduce the impacts and effects on Hydrology, Flood risk and Drainage. Thus, by definition, where impractical nothing has been done to avoid and reduce the impacts and effects on Hydrology. Can the Examiners please closely question what the Applicant means by "where practical". **What design features do the Applicants consider "practical" and what design features are not?**

There are statements that there is no evidence that solar panels increase run off – but no details of that evidence. This is particularly important in circumstances where no solar "farm" of the magnitude of Lime Down has been built and there is no evidence as to how tracking panels, which would be horizontal at night, would cause heavy rainfall to dissipate. It defies common sense to suggest that covering land with over 1.8 million square metres of impermeable surface will not reduce the short-term absorption capacity of the ground beneath the panels with the consequence that the water would be channelled more quickly into the ditch and river systems downhill of the panels.

If one looks at 7.6.7 of the summary there is a list of 8 bullet pointed mitigation measures but not one of these seems to deal with the increased flooding risk that the concentration and acceleration of water from the panels will engender. The Applicant's bullet points seem to be all about how their solar panels and their proposed infrastructure is protected from flood damage. This has the smack of "*I am alright Jack*" alongside a patronising sentiment of "*don't worry your little head*". But, with good cause, we do worry and we do not think the points are being adequately addressed if at all. We are a neighbourhood of small communities and even if Easton Grey may be less affected than other communities downstream from us all these communities need to be considered. If permitted, we believe the Lime Down Solar project will increase flood

risk outside of its boundaries and we do not see how it could possibly be said to reduce flood risk overall.

In Summary all the examples we identify for the adverse effects of run-off are the highest risk Flood Zone 3. The critical rail route to Wales that sits in a cutting through the site is already noted as high risk due to climate change. The Applicant addresses the security of their assets with an apparent disregard for the run-off flood risk being born by the community that will not benefit from the scheme.

The Lime Down Solar project provides no sustainable benefits since the electricity to be generated will not be off benefit to our community. The people who benefit are an overseas investment fund managed by Macquarie bank or those who buy the SPV after the grant of a DCO. On the other hand, the flood risk will be carried over a long period of time by the community that stands to receive no benefit.

#### A commonsense view on the impact on flood risk from Lime down Solar

As noted we understand that from extrapolating information provided by the Applicant there will be in excess of 1.8 million square meters of solar panels that at night will be in a horizontal position. This is the equivalent of in excess of 440 Acres or in excess of 250 Premier league football pitches. As noted above each of those panels will create a rain shadow where the ground below will be dry and removed from the ground that would otherwise be available for the absorption of rain fall. At the same time the panels, like roofs will act to consolidate and accelerate run off in an area that either cannot cope, or is only just coping, with the current effects of rainfall events be they of long and persistent volume or short but high volume. The height of the panels will also increase the energy at which the water falls to the ground. The way in which water run-off consolidates and accelerates is observable to the common person looking at a roof that has no gutters. The rain splashes the soil every which way with the water concentrated into rivulets of water which then conjoin. This effect will be magnified by an enormous factor given the number, and combined surface area, of these panels. Not only will the panels affect run off they will also shade the ground beneath from the sun. As any gardener knows lack of sun and lack of water produce very negative effects on plant growth.

In relation to flood risk the Applicants State

*"The representation raises concern that solar panels would act as a roof, reduce infiltration and concentrate runoff into receiving watercourses. The submitted assessment presented in ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210] reflects established hydrological evidence that the addition of solar panels over a vegetated field does not **materially** increase runoff volumes, peak discharges or response times, and that changes in hydrologic response are **primarily** associated with alterations to ground cover beneath the panels rather than the panels themselves. Panelled areas are therefore designed so rainfall continues to drain to ground, **with no creation of***

**extensive impermeable surfaces and with controls in place to avoid any increase in discharge to watercourses." [our emphasis]**

In respect of the above could the Examiners please ask the following Questions: -

**How can panels, with a surface area of 1.8 million square meters, not change the absorption qualities of land?**

**What kind of control can be put in place to avoid any increase in discharge, i.e. runoff, to watercourses when it rains?**

**What modelling has been done to assess this particular area and the use of panels of this size and type and in this quantity?**

**With the mainline railway passing through cuttings and being surrounded by proposed panels and other infrastructure how can the Applicant's experts ensure runoff will not be diverted into the cutting - as happened further down the line in Storm Claudia?**

**How will tunnelling for cables under minor roads, the M4 and the two railway lines be done and what disruption will be caused.**

**Have the relevant Highways and Rail authorities been consulted and had an opportunity to comment on the detailed plans being proposed. If yes then the Examiners should see those detailed plans and comments. If no detailed plans how can the Examiners take any view on the appropriateness or otherwise of this scheme? How can the examiners conclude that a proper consultation has taken place?**

## **Conclusion**

Lime Down is of the wrong scale and in the wrong place. For multiple reasons the proposal will do substantial and permanent harm to an area of outstanding beauty.

26.4.26

Annex 1



Parish of Easton Grey  
response to statutory

Annex 2

## **Parish of Easton Grey's response to targeted consultation on proposal for Lime Down Solar Park 8.7.25**

Dear Sirs

I refer to your letter dated 3<sup>rd</sup> June 2025 (which arrived on 30<sup>th</sup> May 2025) sent to me as Chair of the Easton Grey parish meeting. I also refer to the enclosed leaflet announcing changes to the boundary of the proposed NSIP referred to as Lime Down.

As already set out in the 9<sup>th</sup> March response to the statutory consultation Easton Grey is strongly opposed to Lime Down for a number of reasons including that it would substantially damage the landscape which abuts an Area of Outstanding National Beauty and conservation areas, increase risk of flooding and create vastly increased traffic on roads which simply cannot take the volume and size of vehicles proposed.

The statutory consultation was unsatisfactory with no proper indication given of the extent and route of traffic in any meaningful way which the residents could understand. The numbers of HGVs likely to use the principal route from the M4 towards Easton Grey, particularly those for the BESS, was so deeply buried in the PEIR that almost no one consulted had any idea of the extent of traffic disruption or the true extent of the damage which Lime Down would inflict on the area.

In your summary you state that the changes comprise “six areas to enable temporary highway and traffic works” and “nine areas where the development boundary area has been adjusted” in the latter case “to avoid constraints such as woodland and hedgerows”. That is 15 changes in total. However, it appears in the description to all 15 changes that the “boundary area has been amended”, i.e. not just nine. It also appears that avoiding constraints like hedgerows means ripping them up.

The changes you now refer to in the leaflet are very difficult to understand. Whilst some changes appear to be simply for a small number of Abnormal Indivisible Loads (which clearly are unsuitable for local roads) others appear to be for further internal access roads which are likely to require further construction vehicles and aggregate (damaging soil structure and further raising the risk of flood) and requiring the removal of ancient hedges.

It is not clear why these changes are being made after the statutory consultation and why the changes are only the subject of a targeted consultation not involving the users of the roads and residents of the villages which will be most affected by the proposals, including those on the cable route.

It is also not clear on what basis you have decided that the changes are minor when the increased land for access routes is likely to increase the need for aggregate deliveries and further damage to soil structure in an area already prone to flooding.

The plans and explanations used on the material you have provided are almost impossible for a lay person to understand. I certainly have struggled.

Beyond the general increase in HGV traffic and the risk that would cause to the users of local roads in terms of safety, the change which causes most concern from the perspective of Easton Grey are set out below. The proposed changes 1 and 2 are particularly close to Easton Grey. This does not mean that the other changes are acceptable:

### **Change 1**

The change appears to be over a complete section of the road between Easton Grey and Norton. That road is the primary route that provides access to the M4 and beyond. The section of road is in a blind dip that has witnessed a number of accidents in the past, I believe one of which, involved our current Queen. It is already a dangerous section of road and not suitable for works. The description states that the road is to fall within the development area so presumably access for the community to use the road will be terminated or limited and it is not clear which but either would not be acceptable. The description goes on to state that this will "allow optimal locating of cables to avoid constraints" which begs the question constraints to whom?

### **Change 2**

"Description of change: The development boundary area has been amended to accommodate the potential for temporary minor junction widening, temporary removal of street furniture and vegetation removal. This will allow an abnormal load vehicle to turn at the corner and provide sufficient visibility for vehicles to safely access the Site. Total area of change: 0.55 ha (1.37 acres)"

The area of land marked in pink is extensive. It is part of the ancient Fosse Way and is much used by walkers, cyclists and horse riders. It is one of the rare parts of the Fosse Way which remains unmetalled and is of significant archaeological significance. It is surrounded on both sides by ditches and hedges and trees with far reaching views of the countryside. The wording at first sight suggests the access is needed for a single AIL but that is clearly misleading since it appears this area is to be used for HGVs to access the site. This use of the Fosse Way and any damage to the hedges and trees and change of the surface of this ancient bye way and make such fundamental changes to the area should not be permitted and is a very significant change which will affect a huge number of receptors.

### **Change 4**

This change is described as necessary to achieve safe visibility splays at a site access. The location was not originally identified as a site access point. Hedgerow would be lost along the north-west side of the Fosse Way.

### **Change 7**

It appears that the existing narrow track south-west of Rodbourne will need to be widened over a length of around 200m. It appears that the south-east side of the track is heavily wooded. There is concern that these works would lead to an adverse impact on the trees.

### **Change 10**

The A429/B4014 roundabout has been included since it lies on the proposed AIL route (orange route) for areas D and E. The route is shown through Corston but no information is provided to show how the AIL would travel through Corston and beyond through Rodbourne to reach the proposed substation site. The local roads are extremely constrained in this area.

### **Change 12**

The turn from the A46 into Acton Turville Road is not identified as being on one of the AIL routes. It raises the question of whether the proposed route via the B4040 (purple route) is seen to be viable. It needs to be demonstrated that the AIL vehicle is able to negotiate the left turn within Acton Turville to join the designated AIL route south on the B4039. It is not clear whether those most affected who use this road or live in Acton Turville have been consulted, either in relation to the main consultation of this targeted consultation.

### **Change 13**

(Purple AIL route) This is the B4039 junction adjacent to the Salutation Inn. The junction is very constrained with well-established hedges and property boundaries close to the edge of the highway boundary. Details are required to demonstrate that the AIL vehicle can successfully negotiate this junction.

The green AIL route passes along Bradfield Cottages north of Hullavington. This road is very narrow and has quite tight bends. It may not be negotiable by an AIL vehicle. The route also passes under the railway before reaching Site D. There is obviously some constraint on width and height passing under the railway bridge. This is the main route into Easton Grey.

We are concerned that you have failed to give an accurate prediction of the HGV movements which will be required. You do not appear to have allowed for the substations and the materials needed for those or the fencing. Nor have you provided any information about the trip generation associated with the cable route.

Please acknowledge receipt and confirm that each of the points raised will be included in any report on the consultation which you prepare for the Planning Inspectorate.

Yours faithfully

██████████

Chair of the Easton Grey Parish Meeting.

