



Lime Down

Solar Park

Technical Note:

Impacts to Non-Equine Businesses

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List of Contents

1	Introduction	2
1.1	Purpose of Document	2
2	Baseline Context.....	3
2.1	The 5 km Study Area.....	3
3	Previous Approach to Assessment	6
3.1	Scoping Stage.....	6
3.2	Pre-Submission and Statutory Consultation.....	6
3.3	Assessment for DCO Submission	8
3.4	Conclusion	18
4	Updated Considerations through Examination	19
4.1	Overview	19
4.2	Representations Made by Interested Parties	19
4.3	Applicant's Response to Submissions	22
4.4	Interaction with Wiltshire Council	25
4.5	Interaction with the Examining Authority	30
4.6	Summary of Additional Measures Secured through Examination	31
5	Conclusions	33

List of Tables

Table 1: Proportion of Businesses and Employment in the 5 km Study Area and within 5 km of the Solar PV Sites	3
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1 Introduction

1.1 Purpose of Document

1.1.1 This document has been drafted in response to a request for additional information by the Examining Authority (ExA) through their Second Written Questions, pursuant to the examination of the Lime Down Solar Project DCO ('the Scheme').

1.1.2 At SE2.2 the ExA asked the Applicant to:

"...provide a technical note on the impact on non-equine local businesses within a 5km area of the proposed development. This should detail the nature of the affected business, their concerns, and what the applicant has done to address those concerns."

1.1.3 This document provides a description of the businesses or commercial enterprises present within the 5 km Study Area surrounding the Scheme, the composition of these businesses by the industry they fall within, and a consolidated report on how these were assessed ahead of DCO submission. This report will also respond to how concerns raised by Interested Parties have been acknowledged and responded to, including where additional mitigation measures have been committed to by the Applicant during the examination process.

1.1.4 The ExA also requested specific responses to effects at Grittleton House, Whatley Manor Hotel & Spa, Foxley Road Nurseries, and The Angel Café, Sherston. The Applicant has responded to that request in the **Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54]**, or directly to the relevant Interested Party. This has been done through the **Applicant's Response to Deadline 4 Submissions [EN010168/EXAM/9.55]** for written representation made at Deadline 4 or the **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088]** where those representations were made orally at Open Floor Hearing 2.

2 Baseline Context

2.1 The 5 km Study Area

2.1.1 The 5 km Study Area for the Scheme covers an area of more 390 km² over much of the northwest of Wiltshire and a small portion of the neighbouring South Gloucestershire and Cotswold District. This area has a population of approximately 107,000 (ONS Census 2021), the majority of whom reside in the urban areas of Chippenham, Corsham, Melksham, and Malmesbury. Of these, only Malmesbury is located within 5 km of the Solar PV Sites, with the rest within 5 km of the Cable Route Corridor.

2.1.2 Within the 5 km Study Area approximately 57,000 people (BRES 2024) are in employment (including business owners and sole traders), with the vast majority of employment being within urban areas or adjoining employment hubs. Approximately 13,500 people are employed within 5 km of the Solar PV Sites. Based on the UK Business Counts for 2025, it is estimated that there are approximately 5,000-5,600 businesses within the 5 km Study Area, of which approximately 1,400 are within 5 km of the Solar PV Sites. The proportion of businesses by location is set out in the below **Table 1**.

Table 1: Proportion of Businesses and Employment in the 5 km Study Area and within 5 km of the Solar PV Sites

Industry Sector	Proportion of Businesses Registers (UK Business Count 2025)		Proportion of Employment (Business Register and Employment Survey 2024)	
	Total 5 km Study Area	5 km Solar PV Sites	Total 5 km Study Area	5 km Solar PV Sites
Agriculture, forestry & fishing (A)*	8.0%	15.4%	2.3%	5.7%
Mining, quarrying & utilities (B,D and E)	0.2%	0.3%	1.5%	0.9%
Manufacturing (C)	5.2%	4.5%	9.1%	5.3%
Construction (F)	14.7%	10.5%	6.2%	6.0%
Motor trades (Part G)	3.4%	2.8%	1.7%	1.2%
Wholesale (Part G)	3.1%	3.1%	3.2%	4.5%
Retail (Part G)	6.2%	5.9%	8.5%	6.2%
Transport & storage (inc postal) (H)	3.2%	2.4%	3.6%	2.9%
Accommodation & food services (I)	5.1%	3.8%	7.8%	11.4%

Industry Sector	Proportion of Businesses Registers (UK Business Count 2025)		Proportion of Employment (Business Register and Employment Survey 2024)	
	Total 5 km Study Area	5 km Solar PV Sites	Total 5 km Study Area	5 km Solar PV Sites
Information & communication (J)	6.9%	6.3%	6.4%	4.2%
Financial & insurance (K)	2.2%	1.7%	1.4%	0.5%
Property (L)	4.3%	4.9%	2.4%	2.0%
Professional, scientific & technical (M)	16.5%	17.8%	12.4%	28.3%
Business administration & support services (N)	9.0%	8.4%	9.3%	4.0%
Public administration & defence (O)	0.4%	0.7%	6.3%	4.7%
Education (P)	2.0%	1.7%	6.7%	5.3%
Health (Q)	2.8%	2.8%	8.1%	4.4%
Arts, entertainment, recreation & other services (R,S,T and U)	6.8%	6.6%	3.0%	2.7%

* Estimates for agriculture are based on Wiltshire overall due to insufficient localised data.

2.1.3 **Table 1** identified that the largest industries in the 5 km Study Area by number of registered businesses and employment are in construction, and professional, scientific & technical services. The latter is very apparent in the area within 5 km of the Solar PV Sites, as a result of the large quantum of workers at the Dyson Campus outside Malmesbury. The area within 5 km of the Solar PV Sites also has the notable characteristic of a large accommodation & food services employment but not a similarly large business registry, implying that there are more larger employers in this industry near the Solar PV sites than is found further along the Cable Route Corridor. This is understood due to the larger accommodation venues at Whatley Manor Hotel, Manor House Castle Combe, and the location of the M4 Leigh Delamere motorway services. Other visitor dependent sectors, such as retail and arts, entertainment, recreation & other services are generally consistent across the 5 km Study Area.

2.1.4 The immediate context of the Scheme is predominantly agricultural land with a small number of residential and commercial properties located in hamlets or more closely connected to nearby villages. The Applicant has largely sought to avoid land adjacent to settlements, and as such has

largely avoided direct impacts to the majority of business premises or services associated with those settlements.

3 Previous Approach to Assessment

3.1 Scoping Stage

3.1.1 The Applicant's EIA Scoping Report was published and submitted to the Planning Inspectorate in July 2024. Therein, Chapter 18 of the report and the supporting Appendix 18.1, set out the proposed approach to assessment of economic impacts arising from the Scheme and the initial baseline information used to support the Applicant's scoping position.

3.1.2 Therein, the Applicant confirmed that is proposed to assess the impacts to business sectors, and specially tourism and agriculture as economic sectors (paragraph 18.1.1). Paragraph 18.4.9 goes on, where describing the methodology for identifying likely effects, to state that:

The Scheme is likely to impact on existing economic sectors within the local and regional impact areas as a result of competition for resources, labour force, and direct and indirect conflicts with economic sectors such as the agricultural economy and in the tourism and recreation economies. Additional localised economic impacts may occur where the location of the Scheme impacts on the operation of businesses near to or adjacent to the Scheme where their location, landscape setting, and long views are fundamental to their economic success.

3.1.3 The Applicant confirms no commitment to assess all individual businesses was proposed at this stage. Only those most directly likely to be affected were proposed to be included for specific assessment.

3.1.4 The Planning Inspectorate published their **Scoping Opinion adopted on 22nd August 2024** following consideration of the Applicant's EIA Scoping Report. Where concerns were raised by consultees in regard to business impacts, this was in relation to impacts on tourists and visitors, and as such, the Applicant included these considerations as part of its assessment of likely effects to tourism and recreation receptors. This was to determine the likely level of effect on tourists and visitors to the area, and establish a likely level of effect overall to tourism-dependent businesses, rather than an assessment of each individual business affected. The Applicant's direct response to the concerns raised at scoping were published in **Environmental Statement (ES) Volume 3 Appendix 1-2: Scoping Opinion Response Table [REP1-055]**.

3.2 Pre-Submission and Statutory Consultation

3.2.1 An interim version of the socio-economic, tourism and recreation assessment was published as part of the Preliminary Environmental Information Report (PEIR) for statutory consultation in January 2025. Chapter 16 therein set out the Applicant's methodology for assessing socio-

economic effects, provided a preliminary assessment of the likely effects anticipated to occur, and the mitigation measures proposed by the Applicant to reduce adverse effects.

- 3.2.2 The PEIR demonstrated the Applicant's approach to assessing business sectors, and employment rates, rather than assessment of individual businesses or premises. During this period, where individual locations were considered to be most greatly impacted, additional design mitigation was embedded into the Scheme's parameters and mitigation measures to reduce location-specific effects. As such, it was not considered necessary that additional reporting on individual businesses "where their location, landscape setting, and long views are fundamental to their economic success" was required.
- 3.2.3 The Applicant furthermore considered that the assessment of individual tourism and recreation receptors provided a more helpful understanding on the likely impacts to tourists and visitors, and where the Scheme would have the largest effect on visitor enjoyment and desirability. It was from this that a judgement on likely economic effects to tourism-dependent industries or services was determined.
- 3.2.4 The Applicant's response to feedback from community stakeholders to statutory consultation is presented at **Consultation Report Appendix F-7: Statutory Consultation under Section 47 of the Planning Act 2008 [APP-040]**, while responses to feedback from statutory consultees is set out at **Consultation Report Appendix G-5: Statutory Consultation under Section 42 of the Planning Act 2008 [APP-045]**.
- 3.2.5 Matters raised by stakeholders focussed on impacts to business in relation to accessibility and potential impacts to travel to and from business sites, impacts to agricultural workers directly displaced by the Scheme, the impacts of the Scheme on tourism or visitor dependent businesses, and the impacts to equestrian businesses.
- 3.2.6 Matters relating to equestrian businesses are subject to a separate report, the **Equine Business Report [EN010168/EXAM/9.62]**, also being submitted at Deadline 5.
- 3.2.7 Based on the information received from stakeholders, the Applicant did not consider there was any need to change the assessment scope as proposed for DCO submission, as it considered all of the potential effects raised as concerns to business were already covered through the assessment scope throughout the Environmental Statement.
- 3.2.8 Following statutory consultation, meetings between the Applicant and Wiltshire Council were used to discuss likely economic effects from the Scheme and how they should be assessed. In the meeting of 1st April 2025 with Wiltshire Council's Economic and Regeneration team representative,

it was confirmed that transport and access, and impacts to agriculture and tourism were the most important priorities for Wiltshire Council's consideration. During this discussion, the only individual businesses requested to be assessed in more detail were agricultural businesses, including tenanted farmholdings. The Applicant therefore sought to provide as much detail as could be given without publishing sensitive information for landowners involved with the Scheme. This was presented as the total number of tenancies affected and an estimated workforce per tenancy in **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]**. Furthermore, the Applicant understood the outcomes of the meeting with Wiltshire Council was that no additional assessment of individual business was considered necessary given impacts on business sectors was to be published in the ES at DCO submission.

3.3 Assessment for DCO Submission

3.3.1 The assessment of socio-economic effects resulting from the Scheme was assessed and published in **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]**. This was supported by the following figures and appendices:

- **ES Volume 2, Figure 16-1: Study Areas for Socio-Economics, Tourism and Recreation [APP-168];**
- **ES Volume 2, Figure 16-2: Tourism and Recreation Sites [APP-169];**
- **ES Volume 2, Figure 16-3: Long-Distance Recreation Routes [APP-170];**
- **ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation, Legislation, Policy, Guidance and Supporting Information [APP-240];**
- **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]; and**
- **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation Summary of Non-Significant Effects [APP-242].**

3.3.2 Together, these documents set out the methodology, baseline conditions, and assessment for economic impacts to business sectors as was scoped and agreed through trough pre-application consultation with all relevant stakeholders and specific engagement with Wiltshire Council.

Methodology

3.3.3 As presented at scoping and PEIR, section 16.6 of **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]** sets out that

the assessment of economic receptors is based on assessing sectors of the local and regional economy likely to be directly and indirectly affected by the Scheme (both beneficially and adversely). The assessment has therefore not assessed effects to individual businesses unless they are directly tied to a recreational function.

- 3.3.4 Section 16.5 of **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]** sets out the Study Areas used to assess economic effects. A 20 km Study Area for economics was used as this approximated a 30-minute commuting distance from the Scheme, and is therefore a reasonable assumption for the area in which employment and derived economic effects generated by the Scheme are anticipated to be greatest. These economic effects are any effects from construction and operational staff, and the indirect or induced effects of supporting services or recipient businesses of additional spending from construction and operational staff.
- 3.3.5 It is recognised by the Applicant that adverse economic effects as a result of the Scheme, on agriculture, and businesses reliant on tourism and recreation would be felt over a much smaller area than 20 km. Agriculture was likely to be affected directly on land within the Order limits, while tourism and recreation effects would likely to be felt in locations where the Scheme would be visible. Hence, tourism and recreation effects were assessed over a 2 km Study Area for local receptors, and a 5 km Study Area for regionally or nationally important receptors. These distances were considered appropriate based on the bare earth zones of theoretical visibility (ZTV) for the Scheme **[APP-097]** and the respective level of importance of the assessed receptors to tourism and recreation. Any adverse economic and employment effects were compared with the 20 km Study Area to ensure that a clear comparison of the quantum of beneficial versus adverse employment and economic effect.

Identification of Effects

- 3.3.6 Beneficial effects from the Scheme are identified as likely to occur primarily within the construction industry, specifically within the civil engineering sector, during construction works. Indirect economic benefits are likely to occur to businesses in the supply chain for machinery, manufacturing and assembly of infrastructure, labour procurement and recruitment, and other associated development such as landscaping, ecological work, and site security. Induced effects through increased spending by construction workers are likely to be felt across a wide spread of the economy. The Scheme is also likely to beneficially effect the accommodation industry specifically where serviced accommodation is used for inbound, temporary construction workers. These benefits are anticipated to be felt across the

wider 20 km Study Area (as this is where workers are likely to be based and spend their money during the construction phase).

- 3.3.7 Adverse effects from the Scheme were identified as likely to occur directly to the agriculture sector, as a result of displacement of work for the siting of the Scheme. These effects were understood to be long-term effects and as such would be present at all phases of the Scheme. Temporary effects on agricultural businesses affected by the construction of the Cable Route Corridor were not assessed separately as these were identified to be short-to medium-term temporary effects, with any economic impacts directly offset by compensation payments.
- 3.3.8 Impacts from the Scheme on tourism and recreation receptors were identified as likely to generate a potential loss of visitors to affected locations. As a result of reduced spending, this would have an adverse effect on tourism-dependent sectors in local areas. Those sectors considered to be most likely to be affected by reduced visitors were: retail (excluding motor sales), accommodation and food services, and the arts, entertainment and recreation sector (including sports activities).
- 3.3.9 Other businesses were considered unlikely to be significantly affected as impacts for the Scheme would be incidental to their business function rather than fundamental. As such, it was considered that these should not be assessed separately, but mitigation measures to minimise impacts on residential and business addresses should be implemented across the Study Area. These mitigation measures were to respond to the following matters:
- Transport and Access: Impacts on the ability for clients to reach businesses, businesses to receive or facilitate delivery of supplies or products, and the ability for service providers to reach clients away from the business or service address;
 - Hydrology, Flood Risk and Drainage, Noise and Vibration, Air Quality, Ground Conditions, Electromagnetic Fields, and Major Accidents and Disasters: Physical impacts on the quality and safety of the working environment for onsite workers and at existing business premises; and
 - Landscape and Visual Impacts: Any impact on the visual or landscape character of locations where business premises are that are a matter of enjoyment or sense of place, rather than as a function of the business itself.

Assessment of Receptors

Agriculture

- 3.3.10 The assessment of impacts to the agriculture sector was built on an understanding of the number of tenant farmholdings that would be affected by the Scheme. A total of nine tenancies were identified by the respective landowners with whom the Applicant was negotiating with. As these discussions were not held in a forum where specific assessment of individual tenant farmholdings could be undertaken, the Applicant had to make assumptions to understand a reasonable case for assessing likely impacts.
- 3.3.11 Due to the size of the tenancies being affected by the Scheme, an approximate loss of 1.5 full-time equivalent (FTE) jobs was considered for each tenancy as a direct result of the Scheme. A further 1.5× multiplier was applied to provide an approximate indirect loss to downstream or supplying businesses. As such, the Applicant determined a worst-case loss of 20.3 FTE jobs was likely to occur as a result of the Scheme.
- 3.3.12 Based on ONS data for the number of sector workers and the gross value added (GVA) of business sectors, it was determined that on average, each FTE worker in agriculture in this area generates an annual £31,000 in GVA to the economy. Using this, it was considered that based on current values, the worst-case loss to the agricultural industry as a result of the Scheme is £628,000 GVA per annum.
- 3.3.13 Losses to landowning agricultural businesses were not included as none of these businesses would be required to cease operating due to the Scheme as a result of additional land outside the Scheme's Order limits. Furthermore, landowners would benefit from ground rent from the Scheme and as such this was considered to benefit more from the Scheme than would be lost to reduction in agricultural turnover.
- 3.3.14 As stated previously, impacts to agricultural businesses affected by the construction of the Cable Route Corridor were not included in the assessment as these would be compensated directly for the temporary use of their land, before being restored to its previous use. The Applicant has sought to enter into voluntary agreement with all landowners affected by the Cable Route Corridor to ensure that this compensation and any working practices on their land can be agreed. That notwithstanding, the DCO has as a fallback option the power to implement compulsory acquisition powers to construct the Cable Route Corridor, in which case compensation would be decided by the relevant authority. In either case, the Applicant considered that there would not be any effect to employment or residual effect to business revenue following completion of construction and restoration works.

Tourism and Recreation

- 3.3.15 Impacts to tourism and recreation receptors are presented in detail in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, with summaries of those findings set out in **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]** to demonstrate how impacts to the perception and use of visitor attractions and recreation features has been considered as a pathway to economic effects.
- 3.3.16 Tourism and recreation receptors were identified within the 2 km and 5 km Study Areas based on desk-based research of publicly available platforms on which these receptors are mapped or advertised. A preliminary list of receptors was presented at PEIR. Stakeholder commentary on additional receptors that had not been identified were added to ensure the robustness of the assessment piece. A scoping exercise was then undertaken (as is presented in Table 2-1 to Table 2-10 of **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**) which describes what likely effects to these receptors there would be, and if none are anticipated to be more than negligible, were scoped out of further assessment. This generally applied to locations at a distance from the Scheme where visual impacts were unlikely to occur, where traffic effects were unlikely to occur, or where there were other barriers to being able to establish a reasonable pathway from the Scheme's impacts to that receptor.
- 3.3.17 For receptors that were scoped in for further assessment, this is presented in Table 3-1 to Table 3-10 of **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. Receptors were assessed on likely effects at all phases of the Scheme in respect to the following considerations:
- Visual impacts on the users of a receptor itself;
 - Visual impacts on the approach to that receptor, both by public rights of way or the highway network;
 - Traffic impacts on accessing that receptor from the highway network;
 - Safety impacts on the users of that receptor or on its approach;
 - Impacts to the audible and sensory environment of a receptor, particularly in respect of noise, odour and air quality; and
 - Changes to the use of a receptor due to direct changes to its functionality.
- 3.3.18 Together, these factors were considered for each individually assessed tourism and recreation receptor to understand the extent to which users would be affected, and what mitigation measures would be required to

minimise those effects. The magnitude of effects to those receptors subject only to embedded mitigation, was used to determine the likely changes to the economic performance of co-locational or directly relevant business sectors.

- 3.3.19 To undertake a localised assessment of the impacts to business sectors, the Business Register and Employment Survey was used to estimate the number of employees in each relevant business sector in each relevant local area. This was done at the smallest geographical level with information available: lower super-output areas within the 5 km Study Area. Where impacts to tourism and recreation receptors (such as PProWs, conservation areas, or specific attractions or recreation facilities) were identified, the highest magnitude of impact in that area was assigned to a 'loss' in employment in that business sector:
- High magnitude: 100% loss of employment, or 50% loss of employment where it related to the Cable Route Corridor;
 - Medium magnitude: 10% loss of employment;
 - Low magnitude: 1% loss of employment; and
 - Negligible magnitude: 0.1% loss of employment.
- 3.3.20 From this, it was determined that the worst-case employment loss as a result of the Scheme was during construction, where there was a potential loss of up to 49.9 employees. In assuming a worst-case scenario, it was assumed these were full-time, and as such the economic loss of each worker would be up to £35,200 GVA per annum. This was based on ONS data for the number of sector workers and the gross value added (GVA) of business sectors, compared against tourism industry employment and visitor spending declared by local tourism boards and Visit Britain survey data. As such, a worst-case loss of £1.76 million GVA per annum was assessed as likely to occur during the Scheme's construction.
- 3.3.21 While individual businesses were not assessed, it was considered that businesses in settlements could use nearby receptors assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, such as a settlement's Conservation Area or a specific visitor attraction, as a proxy for the likely effects on their business, and the mitigation measures that were being committed to in those locations. It was therefore concluded that there were no significant adverse effects to any individual businesses or business sectors indirectly affected by the Scheme.

Application of Mitigation (DCO Submission)

- 3.3.22 Embedded mitigation relevant to socio-economic, tourism and recreation impacts are set out in Section 16.9 of **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]**. Where the assessment of effect has highlighted the need for additional mitigation, or opportunities for integrated enhancement measures, these are set out in Section 16.11 **[APP-068]**. With the implementation of mitigation measures, it is considered by the Applicant that the assessment of impacts is a worst-case scenario, as for many receptors, potential impacts can be minimised.
- 3.3.23 The mitigation and enhancement measures committed to by the Applicant are set out in the **Commitments Register [REP1-114]**, which signposts to each of the relevant management plans those measures are defined within. Each of the management plans is secured by the Requirements in Schedule 2 to the **Draft DCO [REP4-004]**.

Agriculture

- 3.3.24 The Applicant recognises that displacement of agricultural work is a necessity for delivery of the Scheme, as the Solar PV, BESS, and substation infrastructure is being located on agricultural land. As such, the Applicant has committed to measures to ensure that owners and employees of affected agricultural businesses have access to alternative employment. These have been committed to through the **Outline Skills, Supply Chain and Employment Plan [REP3-104]**, which is secured by Requirement 18 of Schedule 2 to the **Draft DCO [REP4-004]**, or through direct contractual agreements with the relevant landowners.
- 3.3.25 Principally, the Applicant has committed to measures to explore options to directly support affected agricultural workers. This could be through support in finding employment at different locations either owned by landowners that are part of the Scheme, or elsewhere in the agricultural industry. Discussions with Wiltshire Council has identified that there are skills and employment shortages within the local agricultural industry, and as such, this may allow for quicker redeployment where skills can be immediately transferred. Alternatively, means by which agricultural workers could be directly employed on the Scheme can be explored either through diversified agricultural practices, for example but not limited to: sheep rearing and grazing, or through skill transfer to land management employment, where there are the practicable facilities and skillsets to enable these.
- 3.3.26 Where agricultural workers are unable to find work in the agriculture sector, the **Outline Skills, Supply Chain and Employment Plan [REP3-104]** sets out the availability of support to enlist in education and skills uplifting, and apprenticeship and training schemes for those workers to find new career opportunities.

Tourism and Recreation

- 3.3.27 Mitigation relevant to businesses in tourism- or recreation-dependent sectors have primarily been applied to reduce impacts on visitors, thus mitigation reduction in visitor spending in local businesses. This also applies to community facilities and recreation locations, where mitigation has been applied principally to reduce the impacts on the users of those facilities.
- 3.3.28 Embedded design mitigation, as secured through the **Design Principles and Parameters [REP4-043]** by Requirement 5 of Schedule 2 to the **Draft DCO [REP4-004]**, seeks to reduce impacts on visitors to tourism and recreation facilities by:
- Prioritising the location of onsite infrastructure such as inverters, substations, and BESS, away from key receptors, in an effort to avoid and minimise visual, auditory, and other sensory interactions; and
 - Providing embedded offsets between onsite infrastructure and any public areas, roads, and public rights of way, to provide a safe buffer between users and onsite activity, and provide a visual separation to members of the public.
- 3.3.29 Furthermore, landscape planting and screening is secured through the **Outline Landscape and Ecological Management Plan [REP3-100]** by Requirement 7 of Schedule 2 to the **Draft DCO [REP4-004]**. This further mitigates visual and therefore experiential impacts to tourism and recreation facility users through breaking sight lines between the Scheme and receptors.
- 3.3.30 Together, design and landscape mitigation measures have been employed to mitigate the perception of change to the landscape character and visual surroundings of tourism destinations and recreational facilities. This is therefore intended to reduce indirect impacts to business reliant on visitor spending at all phases of the Scheme, albeit it is appreciated that this will be most effective during the operational phase of the Scheme once landscaping interventions have suitably matured.
- 3.3.31 With specific regard to tourism, recreation and visitors, the **Outline Construction Traffic Management Plan [REP4-053]**, as secured by Requirement 15 of Schedule 2 to the **Draft DCO [REP4-004]**, contains specific measures to mitigate adverse effects to visitors and recreational users of the highway network. This includes securing HGV access routes, delivery times, and access and egress arrangements to ensure that the safety of both motorised and non-motorised highway users is maintained at all times, while avoiding periods when recreational use of the highway is likely to be at its greatest (evenings and weekends). This is therefore anticipated to reduce indirect impacts to business reliant on visitor spending

who may be put off accessing the local area due to perceived safety concerns.

- 3.3.32 Embedded and additional mitigation for public rights of way have been committed to by the Applicant to ensure impacts to users of public rights of way, for leisure, recreation, or accessing services (and therefore in direct relation to footfall to dependent businesses) are minimised at all phases of the Scheme. These measures are secured through the **Outline Public Right of Way and Permissive Paths Management Plan [REP1-104]** by Requirement 16 of Schedule 2 to the **Draft DCO [REP4-004]**.
- 3.3.33 Additional measures specific to equestrian users of the public highway and public rights of way have been set out in greater detail in the **Technical Note on Impacts to Equine Businesses [REP4-004]**.
- 3.3.34 Finally, for workers in industries that are reliant on tourism and visitor spending who are unable to find work in similar business sectors, the **Outline Skills, Supply Chain and Employment Plan [REP3-104]**, as secured by Requirement 18 of Schedule 2 to the **Draft DCO [REP4-004]**, sets out the availability of support to enlist in education and skills uplifting, and apprenticeship and training schemes for those workers to find new career opportunities.

All Other Businesses

- 3.3.35 The Applicant has included a wide variety of mitigation measures across all phases of the Scheme to minimise adverse impacts on the surrounding environment, and thus on all businesses within the area of influence of which those effects occur. These measures therefore seek to ensure impacts on business operators, employees, and their clients are all minimised.
- 3.3.36 Construction impact mitigation that would apply to all residential or business receptors are secured through the **Outline Construction Environmental Management Plan [REP4-049]** by Requirement 13 of Schedule 2 to the **Draft DCO [REP4-004]**. These measures are proposed to be set in place to control physical impacts from construction activity on the Scheme, including but not limited to flood risk, noise, air quality, and social matters including impacts from inbound construction workers, and onsite and offsite safety measures. Mitigation measures secured through the **Outline Operational Environmental Management Plan [REP4-051]** by Requirement 14 of Schedule 2 to the **Draft DCO [REP4-004]** are proposed so that they act in the same manner throughout the operational lifetime of the Scheme and during peak replacement and maintenance activities. Collectively, these measures are in place to ensure no significant effects to any receptors, including all businesses in the Study Area, result from physical works on the Scheme. At the point of decommissioning, similar

mitigation measures will be secured through the **Outline Decommissioning Statement [REP3-096]** by Requirement 20 of Schedule 2 to the **Draft DCO [REP4-004]** which will ensure businesses operating at the time of decommissioning are not significantly affected by physical works or social impacts from the Scheme.

- 3.3.37 Embedded and additional transport impact mitigation to ensure construction traffic does not cause significant impacts to road users accessing businesses, or to business or service providers accessing customers and clients has been secured through the **Outline Construction Traffic Management Plan [REP4-053]** by Requirement 15 of Schedule 2 to the **Draft DCO [REP4-004]**. These measures apply universally to all business and service providers in the Study Area. These measures are in place to ensure HGV movements are controlled and predictable, enabling local businesses and their clients to understand where and when they are most likely to interact with HGV movements generated by the Scheme. These measures also commit to minimising delay to road users by setting out what traffic management measures will be in place, and at which locations, so that any delays, closures and diversions can be understood in advance by all business operators and clients. This is likely to be the point of greatest concern to business owners and operators, and as such the Applicant has committed to a comprehensive suite of measures based on the information secured at present for the Scheme. The Applicant also seeks to reiterate that the full detailed measures for traffic and transport management during construction will be submitted to Wiltshire Council who must consult the relevant highway authorities (Wiltshire Council and South Gloucestershire Council), as is secured through Requirement 15 of Schedule 2 to the **Draft DCO [REP4-004]**.
- 3.3.38 The measures in the **Outline Skills, Supply Chain and Employment Plan [REP3-104]**, as secured by Requirement 18 of Schedule 2 to the **Draft DCO [REP4-004]**, are principally set out to mitigate or enhance economic conditions directly affected by the Scheme: construction and supply chains, agriculture, and tourism-dependent industries. That notwithstanding, the measures are not exclusive to those business sectors, and may be able to be applied to businesses more generally within the Study Area. This is of particular relevance to identifying local businesses that are capable of being included in the supporting industries or supply chain for the Scheme's construction and operation. By supporting local skills uplifting, training, and education provision, local businesses are also likely to benefit in the long run from a more qualified working population, particularly where local employees have fulfilled temporary roles during construction and looking for other work post-construction.

3.4 Conclusion

- 3.4.1 As presented in Table 16-17 to Table 16-19 in **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]**, significant residual effects on socio-economic, tourism and recreation receptors are limited to: three public rights of way or unsurfaced highways used for recreation (during construction), four long-distance recreational routes (during construction, operation, and decommissioning), and one equestrian facility (during construction). No significant adverse effects are anticipated to any specific business sector within the 5 km Study Area as has been specifically considered for this technical note, or in the 20 km Study Area as originally assessed. This is subject to the implementation of the mitigation measures secured by the relevant Requirements in Schedule 2 to the **Draft DCO [REP4-004]**.

4 Updated Considerations through Examination

4.1 Overview

4.1.1 During the post-application and examination process, representations from a substantial number of interested parties representing local businesses and service providers have been published for consideration by the Applicant, local authorities, and Examining Authority. The Applicant has sought to provide a response to all representations made so far in the examination process, and has sought to either provide suitable information to alleviate concerns, or adopt additional mitigation measures or procedures where it will have a material beneficial effect to local businesses and services.

4.2 Representations Made by Interested Parties

Relevant Representations

4.2.1 A total of 4,958 Relevant Representations were received following submission of the DCO from a range of statutory bodies, elected representatives, businesses, Affected Persons, and other Interested Parties.

4.2.2 Impacts on businesses was a recurring theme across a significant number of these representations. These included from businesses describing the anticipated impacts to their employment, viability, and on their operations, whether directly or indirectly, and written commentary from members of the public raising economic concerns at a higher level.

4.2.3 Representations received by businesses largely related to agricultural impacts, visual impacts and traffic impacts. Commentary was received by businesses across the following sectors:

- Accommodation services – primarily hotels and B&Bs;
- Agriculture and food production;
- Community facilities with bookable spaces;
- Extra-curricular teaching services;
- Food and drinking services and catering services;
- Garden centres;
- Recreation facility operators;
- Religious organisations;

- Renovators, decorators, and building repair and management services;
- Storage facilities;
- Vehicle renting services; and
- Equine businesses – see the **Equine Business Report [EN010168/EXAM/9.62]**.

4.2.4 The Applicant understands that the majority of the businesses making representations either operate from, or have clients within the 5 km Study Area. Business and economic concerns were also made by business owners and employees representing themselves rather than the business as a party in its own right.

4.2.5 The concerns raised most prominently by representations were:

- The use of land for constructing the Cable Route Corridor would adversely affect to ability to grow crops or graze the affected land;
- The Scheme's visual impact would deter visitors from staying and spending money in the local area;
- The Scheme's visual impact would have an adverse effect on the desirability of the local area for living and working within;
- Disruption to the use of public rights of way would deter visitors from using these routes and spending money in businesses the local area that are readily accessible from the public right of way network;
- HGV traffic associated with construction would disrupt road travel, impacting upon business being able to operate and access clients, and impact clients being able to travel to business locations;
- Uncertainty around the extent to which mitigation measures would be effective were creating conditions in which investment decisions for businesses cannot be made; and
- Some businesses also presented location-specific concerns and sought respective location-specific mitigation or avoidance measures.

4.2.6 Members of the public making representations largely raised similar concerns, with additional concerns raised about the impacts to agricultural workers or tenant farmers displaced by the Scheme, indirect or induced effects, such as downstream effects on food production and prices, supply chain impacts to businesses, and raised concerns for specific businesses or facilities that did not themselves make representations.

Oral and Written Representations

Deadline 1 and 1A

4.2.7 At the opening of the DCO examination stage, Interested Parties and Affected Persons were invited to speak at Open Floor Hearing 1 to provide their overarching concerns about the Scheme. This included a number of local businesses owners who reiterated their concerns as presented in their Relevant Representations. This included:

- Concerns for agricultural businesses affected by the Cable Route Corridor, sharing concerns about construction effects on their ability to grow crops and graze livestock;
- Questions were raised by agricultural tenants affected by the Scheme, looking to understand impacts to business viability and contractual arrangements with landowners were the Scheme to be consented;
- Concerns were raised by hospitality businesses (accommodation, or food and drink establishments) about the indirect effects to their business from reduction in tourism and visitor activity and spending;
- Impacts on the desirability to affected community facilities of events venues for bookings; and
- Concerns raised in respect to impacts on equine businesses.

4.2.8 At deadline 1 and deadline 1A, Interested Parties were able to provide their Written Representations, and summaries of the oral submissions made at Open Floor Hearing 1. As such, concerns around business impacts were largely consistent with Relevant Representations. Additional comments were made in relation to tourism impacts, specifically if visitors to local events, the Cotswold National Landscape, or the Badminton Horse Trials, were dissuaded from attending those events, or staying or spending in local settlements as a result of the Scheme's presence. Commentary regarding the effects on local businesses that rely on local recreation, such as cycling clubs, was specifically raised.

Deadline 2

4.2.9 At Deadline 2, several Interested Parties provided new or updated written submissions. Comments from Interested Parties made at previous deadlines were largely summarised and submitted with additional commentary from Stop Lime Down in their Deadline 2 submission. Stop Lime Down's submissions also provided additional commentary on Written Representations made by Wiltshire Council.

Deadline 3

- 4.2.10 Submissions made by Interested Parties at Deadline 3 largely focussed on responses to **Examining Authority's First Written Questions [PD-010]**. For Affected Persons, this was used to share locational information about businesses that are likely to be directly affected by the Scheme. A small number of additional submissions were made to identify key impacts to local businesses, including a new submission from the owner of a B&B connected to an arts and ceramic business.

Deadline 4

- 4.2.11 Ahead of Deadline 4, Compulsory Acquisition Hearing 1 and Open Floor Hearing 2 were held through which Affected Persons, and any other Interested Parties, were able to make further oral representations in regard to business impacts. These provided updated positions from respective Affected Persons, and any other Interested Parties based on ongoing negotiations with the Applicant, and any updated understanding of the Scheme as published through the written representations made at each examination deadline. Written summaries of these oral representations were submitted at Deadline 4, along with any other additional information requested by the Examining Authority.

4.3 Applicant's Response to Submissions

- 4.3.1 The Applicant has continued to engage with businesses directly affected by the Scheme through discussions of Heads of Terms with Affected Persons as listed in the **Book of Reference [REP3-009]**, with records of these discussions, and progress on them set out in the **Land and Rights Negotiations Tracker [REP4-008]**. Through these discussions, the Applicant has been able to give location-specific information about how the Scheme is likely to affect Affected Persons and their businesses, and the extent to which unavoidable effects are compensated, either through voluntary agreements or the compensatory requirements attached to the exercise of Compulsory Acquisition and Temporary Possession powers.

Relevant Representations

- 4.3.2 The **Applicant's Response to Relevant Representations (Part 1) [PDA-009]** sets out the Applicant's responses to all commentary provided through relevant representations by the local authority, statutory bodies, elected representatives (including parish councils), and the comments of businesses and Affected Persons. The Applicant sought to ensure all comments were responded to in full to provide all available information to provide to clarity to business owners, whether that be in clarifying mitigation measures being committed to, or what location-specific considerations applied to their business premises, clients, or operations. Whilst this largely

related to explaining, or signposting to, existing commitments, where location-specific concerns were raised the Applicant committed to further engagement with these parties to understand their concerns and how they could be addressed. This was done through discussions with Affected Persons as recorded through the **Land and Rights Negotiations Tracker [REP4-008]**, or through voluntary engagement with individuals and business owners, albeit so far this has largely been requested by equine businesses.

- 4.3.3 Where responding to more generalised comments from other Interested Parties, the **Applicant's Response to Relevant Representations (Part 2) [REP1-117]** directs parties to where their comments can be addressed through information taken from the Environmental Statement or the management plans secured by the requirements in Schedule 2 to the **Draft DCO [REP4-004]**.

Oral and Written Representations

Deadline 1 and 1A

- 4.3.4 At Deadline 1A, the Applicant provided its **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]** which set out to respond to all comments made by those making oral submissions. As for Relevant Representations, the Applicant's responses primarily referred to its mitigation commitments as secured by the requirements in Schedule 2 to the **Draft DCO [REP4-004]**, and where discussions with Affected Persons were ongoing as recorded through the **Land and Rights Negotiations Tracker [REP4-008]**.
- 4.3.5 The **Applicant's Response to Written Representations [REP2-039]** and the **Applicant's Response to Deadline 1A Submissions [REP2-040]** sought to respond to all representations made by Interested Parties at Deadlines 1 and 1A. Due to the consistency of comments made, the Applicant continues to reiterate its mitigation commitments as secured by the requirements in Schedule 2 to the **Draft DCO [REP4-004]**, and where discussions with Affected Persons were ongoing as recorded through the **Land and Rights Negotiations Tracker [REP4-008]**. Additional location-specific commentary was given to business owners raising concerns about specific access routes, views, and spatial relationships between the Scheme and their sites.

Deadline 2

- 4.3.6 The **Applicant's Response to Comments Received at Deadline 2 [REP3-129]** covered all additional commentary raised by Interested Parties or by Stop Lime Down. Where the Applicant had responded to the Examining Authority's First Written Questions **[REP3-128]**, the Applicant

ensured that any updated positions on mitigation measures, including the securing mechanism being relied upon, or information being provided to the examination, were also presented in **[REP3-129]** for the benefit of Interested Parties.

Deadline 3

- 4.3.7 The **Applicant's Response to Other Parties' Responses to Examining Authority's First Written Questions [REP4-081]** and the **Applicant's Response to Submissions Received at Deadline 3 [REP4-082]** respond to submissions made by Interested Parties at Deadline 3. As more detail was presented by Affected Persons, a more detailed and specific response to concerns was able to be provided by the Applicant. Furthermore, where additional engagement post-consent was considered likely to be required with Affected Persons or businesses owner near to or adjacent to the Order limits, at this point the Applicant committed to ensuring relevant stakeholders would be directly engaged with to resolve outstanding concerns regarding impacts to businesses and the application of mitigation measures relevant to them.

Deadline 4

- 4.3.8 The Applicant used attendance at Compulsory Acquisition Hearing 1 as a means to be able to publicly communicate the positions with, and discussions outstanding with Affected Person. This included directing the Examining Authority to what discussions had already taken place, reinforcing what mitigation measures were in place for businesses directly affected by the Scheme, and providing Affected Persons a direct response to outstanding uncertainties raised as concerns or anxieties. The Applicant openly acknowledged the onerous nature of the Compulsory Acquisition process and the uncertainty that imbues on landowner, and the resultant reason why the Applicant would prefer that voluntary agreements can be put in place for the benefit of both parties.
- 4.3.9 A **Written Summary of the Applicants Oral Submissions and Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points [REP4-084]** was subsequently submitted at Deadline 4, with any action points taken away from that hearing responded to in written form. The Applicant also provided a **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Responses [REP4-088]** to demonstrate how the Applicant is continuing to respond to the issues being raised in respect of local businesses.
- 4.3.10 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points for **Issue Specific Hearing 2 [REP4-085]**, **Issue Specific Hearing 3 [REP4-086]**, and **Issue Specific Hearing 4 [REP4-087]**, were also provided at Deadline 4. These

set out the Applicant's response to any oral submissions made by Interested Parties in respect to the environmental topics being discussed at those hearings, and provided additional information where it had been requested by the Examining Authority or could not be given during the hearing itself.

- 4.3.11 The Applicant has furthermore responded in writing to any further submissions made by Interested Parties (including their own summaries of oral submissions). This is set out in the **Applicant's Response to Deadline 4 Submissions [EN010168/EXAM/9.55]**.

4.4 Interaction with Wiltshire Council

Relevant Representations

- 4.4.1 The Council's first response to the complete DCO submission and assessment therein was published in their **Relevant Representation [RR-4934]**. This set out that the Council were not in dispute with the methodology or calculation of economic and employment effects, and confirmed they were happy to see that an **Outline Skills, Supply Chain and Employment Plan [REP3-104]** was secured through the DCO. The Council's position was however that the likely impact to the tourism sector would be considered significant. The Council also gave high level comments on the need for engagement between Wiltshire Council's Economic Development Team and the Applicant team, and the facilitation of feedback from local business groups.
- 4.4.2 The **Applicant's Response to Relevant Representations [PDA-009]** acknowledged these comments and responded with its justification in why it considered that the impacts to the tourism sector were not considered to be significant, as the worst-case loss of employment and economic value even within the 5 km Study Area was less than 1% of baseline conditions. The Applicant also committed to ongoing engagement through the **Statement of Common Ground [REP4-061]**, and confirmed the local business groups referenced by Wiltshire Council were explicitly added as consultation stakeholders within the **Outline Skills, Supply Chain and Employment Plan [REP3-104]**, secured by Requirement 18 of Schedule 2 to the **Draft DCO [REP4-004]**.
- 4.4.3 At the same time, Wiltshire Council also made Comments on Relevant Representations made by Interested Parties **[PDA-014]** in which it noted its overarching concerns to businesses, these being implementation of mitigation, impacts to users of the public rights of way network, and the impacts on traffic accessing businesses and services. Within these, a specific concern over the impacts to village halls and pubs was raised.

Local Impact Report

- 4.4.4 The **Local Impact Report from Wiltshire Council [REP1-137]** set out the Council's statutory response to the DCO application. This set out the Council's interpretation of the likely effects of the Scheme, both beneficial and adverse, and set out the Council's position on any further mitigation requirements and securing mechanisms. These were:
- Requirement for a comprehensive business survey recording both positive and negative impacts of the scheme;
 - Requirement for a business response plan, to ensure agreed plans are in place and ready to be implemented to support local businesses; and
 - Requirement for a visitor centre providing information on the benefits of the various forms of renewable energy.
- 4.4.5 The Applicants position in respect of these requirements was set out in Table 16-1 of the **Applicant's Response to the Local Impact Report [REP2-038]**.
- 4.4.6 The Applicant considered requirement for a comprehensive business survey would be too onerous for a Scheme of this scale and level of effect to economic sectors. The Applicant also considered that the **Outline Skills, Supply Chain and Employment Plan [REP3-104]** already contained sufficient measures to safeguard business support directed to sectors most affected by the Scheme. This also applies to the requirement for a business response plan. Wiltshire Council were invited to provide comments or recommendations for additional measures that could be secured through the **Outline Skills, Supply Chain and Employment Plan [REP3-104]** by Requirement 18 of Schedule 2 to the **Draft DCO [REP4-004]** rather than a separate requirement.
- 4.4.7 Whilst the Applicant did not object to the provision of a visitor centre, it considered this to be a community benefit rather than a mitigation measure. As such, the Applicant considered the most reasonable mechanism would be through the Community Benefit Fund, through which it could be determined if this was a measure supported locally, rather than as a requirement.

Written Representations

- 4.4.8 Through Written Representations at each examination deadline, Wiltshire Council have iteratively updated their position in respect of economic effects on business, including drawing on commentary made by Stop Lime Down in objection to the Scheme, the assessment outcomes and the proposed mitigation measures.

Deadline 1

- 4.4.9 The Council's position as stated through their written representations at Deadline 1 **[REP1-138]** reaffirmed the position that it believed that the Scheme would have a significant adverse effect on the local economy.
- 4.4.10 This was responded to in writing in the **Applicant's Response to Written Representations [REP2-039]** where the Applicant reaffirmed the justification behind the assessment outcome that there would be no significant adverse effects to the local agricultural or tourism sectors.
- 4.4.11 It was only understood through discussions in meetings that the difference of opinion is based on Wiltshire Council considering impacts to any individual business would constitute a significant effect, while the Applicant's assessment in **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]** has assessed impacts on industry sectors within the given Study Area, with mitigation measures being applied to avoid, where practicable, individual businesses being disproportionately affected.

Deadline 2

- 4.4.12 In their **Comments on written representations [REP2-046]**, Wiltshire Council looked to respond to comments made by Stop Lime Down and January and Dermot Farrington. Through this, Wiltshire Council raised the provision of a visitor centre, and for the first time in writing, a "compensation scheme for businesses that can show a reduction in income of over 10% during the construction and decommissioning periods and for one extra year after each event", as mitigation measures. These points were reiterated in their wider **Comments on submissions received at deadlines 1 and 1A [REP2-048]**, with the additional introduction of the request for the establishment of an Innovation Forum, particularly in reference to technology innovation and recycling and waste handling innovation.
- 4.4.13 In the **Applicant's Response to Comments Received at Deadline 2 [REP3-129]**, the Applicant confirmed the mitigation measures for businesses already committed to through the **Draft DCO [REP4-004]**. The Applicant also confirmed that the appropriate mechanism for a visitor centre would be through the Community Benefit Fund, subject to local stakeholder agreement of acceptability, as this is an additional benefit or enhancement measure, rather than mitigation required to deliver the Scheme. The Applicant set out its principal objection to the use of a compensation scheme as it was considered that a 10% threshold was too low to be accurately attributed to the Scheme rather than influence from non-controllable macro-economic effects. This was also a novel suggestion for a solar DCO, and as such, Wiltshire were requested to provide more

information or precedents cases to determine why they believed a compensation scheme was appropriate, given the mitigation measures already secured.

- 4.4.14 The Applicant has no objection to the development of an Innovation Forum in principle, but at the point it was first raised, was unclear about the role and scope of what was being requested, and considered that the Innovation Forum may be an additional benefit rather than a mitigation measure. The Applicant has since been able to discuss the role and securing mechanisms for the Innovation Forum with Wiltshire Council in more detail and as such the Applicant has provided an update to the position at Deadline 5, as set out in response to Written Question SE2.10 in the **Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54]**.

Deadline 3

- 4.4.15 Wiltshire Council's **Comments on D2 Submissions [REP3-141]** responded to the Applicant's submissions, stating their disagreement with the Applicant's assessment outcomes, and reaffirming their request for a business compensation scheme. The Council also raised its own concerns regarding the impacts to the business viability of Grittleton House, and sought additional location-specific mitigation measures to address these concerns.
- 4.4.16 The Applicant retained its position on assessment outcomes and need for a business compensation scheme in the **Applicant's Response to Submissions Received at Deadline 3 [REP4-082]** on the basis that the Scheme had assessed impacts to business sectors, and had secured appropriate mitigation measures through the **Draft DCO [REP4-004]**. The Applicant's assessment of impacts on Grittleton House has been led primarily by cultural heritage and visual considerations, to which the Applicant has assessed no significant effects, which Wiltshire Council has agreed upon. The only outstanding concern therefore is solely economic. The Applicant considers that due to the short-term impacts likely to occur, and with construction mitigation measures in place, as secured by the **Outline Construction Environmental Management Plan [REP4-049]** by Requirement 13 of Schedule 2 to the **Draft DCO [REP4-004]**, that there would be no significant effect on the business viability of Grittleton House. The Applicant confirms that additional engagement with the owners of Grittleton House has been undertaken in the later stages of the examination based on their own representations, and the concerns raised by Wiltshire Council and the Examining Authority.
- 4.4.17 Wiltshire Council's **Responses to the ExA's first written questions [REP3-142]** gave a substantial amount of detail on the Council's aspirations for the Innovation Forum, confirming that it is principally to be used as an

information-sharing platform, including providing the Crossrail/Elizabeth Line innovation and governance platform as an example of how an Innovation Forum has been considered on other large-scale infrastructure projects.

Deadline 4

- 4.4.18 In its commentary on the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**, Wiltshire Council in their **Comments on any submissions received at deadline 3 [REP4-091]** have reasserted their consideration of significant effects on local businesses, noting that "a significant number of representations which support this opinion". The Council have not yet stated what their significance criteria is, or how it has come to that judgement. The Council has also asked for more information on supply chain business, which was also picked up by the Examining Authority. The Applicant has responded to these matters at Deadline 5 in the **Applicant's Response to Deadline 4 Submissions [EN010168/EXAM/9.55]**.

Statement of Common Ground

- 4.4.19 The Applicant has sought to actively engage with Wiltshire Council through the process of agreeing a **Statement of Common Ground [REP4-061]**, the most recent iteration of which has been submitted at Deadline 5. Through meeting with representatives of Wiltshire Council, the Applicant has sought to understand the position of the Council in respect to socio-economic effects, and the reasoning behind requests for further information or mitigation measures.
- 4.4.20 The Applicant's position currently is that many of the mitigation measures requested either overlap with mitigation measures already committed to, or go above and beyond what is reasonably expected for a Scheme which is assessed to have no significant adverse effects to assessed economic sectors. This includes the provision of separate compensation scheme for businesses indirectly affected by the Scheme, to which the Applicant considers that the statutory tests for compensation under any DCO powers would not be met. Additionally, the Applicant considers that there are alternative means through proactive engagement with business owners that would achieve the same benefit in relation to mitigating impacts on business confidence, future investment decisions, and resilience in a business' operations.
- 4.4.21 The Applicant has sought to include recommendations from Wiltshire Council for additions to commitments in the **Outline Skills, Supply Chain and Employment Plan [REP3-104]**, as secured by Requirement 18 of Schedule 2 to the **Draft DCO [REP4-004]**, comprising of additional

stakeholder groups committed to be engaged with, and in principle, the development of an Innovation Forum.

4.5 Interaction with the Examining Authority

First Written Questions

- 4.5.1 In the **Examining Authority's First Written Questions [PD-010]**, the Applicant was asked to provide information on: the assessment approach and outcomes for agricultural and rural employment, how the Study Area for economics was determined and used for assessment, additional measures that could be added to the Outline Skills, Supply Chain and Employment Plan, and the extent of impacts to equine health and businesses.
- 4.5.2 Direct responses were provided in the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**. Actions requiring updated documentation were undertaken in respect of the updated **Outline Skills, Supply Chain and Employment Plan [REP3-104]** submitted at Deadline 3, and the commitment to provide an **Equine Business Report [EN010168/EXAM/9.62]** which has been submitted at Deadline 5.
- 4.5.3 The Applicant has sought to positively engage with the requests for information made by the Examining Authority so that it can provide the Examining Authority with sufficient information to make an informed recommendation towards its decision on the Scheme's application for development consent. The Applicant has considered the merits of the additional mitigation measures being proposed and has integrated them where appropriate into the outline management documents to be secured by the relevant Requirements in Schedule 2 to the **Draft DCO [REP4-004]**.

Compulsory Acquisition Hearing 1

- 4.5.4 During Compulsory Acquisition Hearing 1 on 30th June 2026, the Examining Authority heard from eight landowners (or their representatives) affected by the application for Compulsory Acquisition and Temporary Possession powers through the **Draft DCO [REP4-004]**. The majority of those landowners also operate agricultural businesses that would be directly affected by the Scheme, albeit limited to the construction of the Cable Route Corridor or access to the Solar PV Array sites. At the hearing, those affected parties were able to present their concerns in regard to their business orally to the Examining Authority (and to the Applicant), with the Applicant also able to present its response orally.
- 4.5.5 During the hearing, the Applicant set out its response to direct queries raised by each of the parties present, including providing information on how

the practical requirements for works are smaller than the areas sought for Compulsory Acquisition and Temporary Possession powers, due to the need for optionality ahead of detail design decisions being made for the Scheme. The Applicant furthermore explained how compensation for Compulsory Acquisition and Temporary Possession powers would be applied, including the provision of compensation for losses to agricultural businesses, such as to arable crop impacts and disturbance of animal grazing areas. The Applicant furthermore explained how it is continuing to attempt to agree compensation through voluntary Heads of Terms rather than relying upon the powers in the **Draft DCO [REP4-004]**. The Applicant therefore considers that it is making all practicable efforts to minimise the economic effect on these businesses by attempting to agree financial compensation ahead of the DCO being consented. The Applicant therefore considers that the approach to temporarily affected agricultural businesses did not require specific assessment, as set out in **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]**. The Applicant continues to consider that there is no significant adverse effect to agricultural businesses on the Cable Route Corridor.

Second Written Questions

- 4.5.6 The Applicant has responded to requests for further information in relation to businesses in its **Second Written Questions [PD-014]** through this technical note, through the **Equine Business Report [EN010168/EXAM/9.62]** and the **Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54]**.

4.6 Summary of Additional Measures Secured through Examination

- 4.6.1 The Applicant has committed to the provision of a Stakeholder Communication Plan, secured via the **Outline Construction Environment Management Plan [REP4-049]** by Requirement 13 of the **Draft DCO [REP4-004]**, since the DCO application was submitted. However, as part of engagement with Affected Persons and some Interested Parties, particularly those with businesses closely located to elements of the Scheme, the Applicant has committed to ensuring those business owners and operators are included in all post-consent communications. The Applicant has furthermore committed to ensure each of these parties is invited to be part of the Community Liaison Group. This is intended to allow greater engagement between business owner and the Applicant post-consent, in an effort to mitigate concerns and anxieties around unknown elements of the construction and operational phase of the Scheme. This communication channel is also to be used for business owners to inform the Applicant of any operational sensitivities that the Applicant should be

aware of so that, where practicable, construction work can be altered to minimise effects.

- 4.6.2 The Applicant has also committed to an extended set of Terms of Reference for the Community Liaison Group to be submitted pursuant to the discharge Requirement 4 of Schedule 2 of the **Draft DCO [REP4-004]**. This act has been undertaken in response to discussions with Wiltshire Council's Public Health team, with any outstanding considerations presented in the updated **Statement of Common Ground [REP4-061]** at Deadline 5. This has done to provide additional assurance to Wiltshire Council of the commitment the Applicant has to community engagement and mitigation of adverse impacts to community wellbeing.
- 4.6.3 The Applicant has committed to iterative updates to the **Outline Skills, Supply Chain and Employment Plan [REP3-104]** throughout the examination in response to discussions with Wiltshire Council's Economic Development Team and as requested by the Examining Authority. These have been to:
- Include explicit reference to stakeholders to be engaged with pursuant to the development of the full Skills, Supply Chain and Employment Plan post DCO-consent;
 - Provide greater commitments to apprenticeship, STEM education and career advice, and local recruitment at each major phase (construction, peak replacement, and decommissioning) of the Scheme; and
 - Commitment to greater monitoring and enhanced safeguarding procedures.
- 4.6.4 As such, these are now secured through Requirement 18 of Schedule 2 to the **Draft DCO [REP4-004]**.
- 4.6.5 The Applicant has also committed to the provision of an Innovation Forum through discussion with Wiltshire Council. Provisional arrangements have been considered and presented in the **Statement of Common Ground [REP4-061]** at Deadline 5. Any outstanding matters are envisaged to be agreed for Deadline 6.

5 Conclusions

- 5.1.1 This should detail the nature of the affected business, their concerns, and what the applicant has done to address those concerns.”
- 5.1.2 This technical note has identified the significant range of businesses within 5 km of the Scheme, covering a large rural area interspersed with a small number of distinct large urban areas. The Scheme has been identified as most likely to beneficially affect businesses in the civil engineering sector, and parts of the supply chain to that industry, with more limited benefits to serviced accommodation and wider spending impacts. Adverse effects are anticipated to be likely to occur in the agriculture sector, food and drinks sector, local accommodation sector (where dependent on recreational stays more than business stays), and other visitor-dependent industries. This reflects the industries assessed in **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]**.
- 5.1.3 Whilst mitigation and enhancement measures have been secured through the relevant management plan in Schedule 2 to the **Draft DCO [REP4-004]**, the examination process has revealed numerous outstanding concerns from local businesses. This is primarily in respect of land use, traffic, and visitor dissuasion. This report has set out how the Applicant has sought to respond to these concerns, and where given substantive weight by Wiltshire Council and the Examining Authority, has provided additional mitigation measures through the examination process.
- 5.1.4 In consideration of the existing and additional mitigation measures secured during the examination process, the Applicant confirms that the assessment outcomes of **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]** stand, and confirms there are no significant effects to any business sector within the 5 km Study Area surrounding the Scheme. Any individual business likely to be specifically affected by the Scheme either have been engaged with throughout the examination process, or are committed to be engaged with through the Community Liaison Group and Stakeholder Communications Plan to ensure construction impacts to their business’ operations can be minister through coordinated and targeted mitigation efforts.