

CLOSING SUBMISSIONS FOR THE PARISH OF EASTON GREY

16 October 2026

The Parish of Easton Grey is grateful to the Examining Authority for the care and attention given by them to the vast number of documents submitted by the Applicant and others during the course of the Examination. This is not something which is possible for a very small parish with an annual precept of £1500; accordingly, we thank Stop Lime Down for the detailed analysis, submissions and reports that they have submitted. This group, funded by many across all the affected communities, has been able to produce the science and expertise to substantiate the concerns of Easton Grey and many other Parishes. In line with the Easton Grey Parish meeting's AGM these submissions are adopted. We also thank the Examining Authority for asking many challenging questions of the Applicants about their documents and the details of the Scheme and its proposed construction.

The majority of the concerns expressed in the Parish throughout this long process, including in the Parish's Relevant Representations [REP1-140] and in the submission made following the Open Floor Hearing on 26 April [REP1A-018] remain. As we noted in our initial Relevant Representations our submissions on the statutory consultation and targeted consultation had been substantively ignored by the applicant. Our Relevant Representations raised substantive points under the following headings; Landscape and visual, Flood and river pollution, Cumulative effect, Local amenity, Noise, BESS, Ecology and biodiversity, Heritage, Roads and traffic, Maintenance and decommissioning, Procurement, Alternatives, Community benefit, Carbon benefit and green credentials. Given the mass of material we have been unable to track where, in the applicant's subsequent responses to the Examiners' questions, these points and concerns have been adequately, or at all, addressed and/or allayed.

On the contrary many of those concerns have increased as the full extent of the Scheme has emerged and the inadequacy of the responses given by the Applicants to many of the questions raised by the Examiners have become apparent. Without repeating every point already made we would like to highlight some and update others.

The core of Easton Grey is a conservation area, and the parish is almost entirely within the Cotswold National Landscape. The Scheme abuts the Parish boundary, and the proposed development is within 300 metres of the CNL.

We are one of the gateways to the Cotswolds for those coming from the M4 Junction 17. Everyone driving to or from Easton Grey, away from or towards Norton and Hullavington, travel peaceful rural roads with unhindered views. This will be an entirely different experience should the scheme proceed. This is particularly the case for the fields

beside the bend on the corner of the Fosse Way (Fields B6-B9). Currently it is possible to see Malmesbury from the proposed access into field B6 in the distance with nothing to interrupt that view except trees and hedges. That will change completely if the fields are instead a sea of 4.5m tracking panels. It is still not understood why it is considered appropriate to use 4.5m tracking panels in this sensitive area which is made up of good agricultural land that should in any event be avoided by schemes such as this.

This is an area with many public rights of way which will be significantly impacted. The residents of Easton Grey walk these peaceful rights of way as part of their way of life. It is also an area much used by cyclists and horse riders. The enjoyable environment will be entirely different if fenced in with huge panels and inverters making a constant noise.

This impacts not only residents but visitors to the area as, for example, has been explained to the Examining Authority by the representatives of Whatley Manor.

It is also of note that the road between Norton and Easton Grey is a single-track road with passing places. This road is not suitable for HGVs and the Parish, in conjunction with the Wiltshire County Council (WCC), are in the process of agreeing additional signage to improve road safety and reduce the impact that traffic has on this road. This is being dealt with through the Local Highway and Footway Improvement Group (LHFIG). The Parish's entire annual income is likely to be swallowed by the contribution that it will have to make to WCC to implement these improvements.

There is already a very dangerous crossing of the Easton Grey to Norton Road and the Foxley to Sherston road (see where The Plain Farm is marked on the OS map). During the period of this process there have been two serious accidents at this crossroad and there are grave concerns that any increase in the use of these rural roads, particularly by "non-locals" or others unaware of this dangerous crossroad, will lead to further serious or potentially fatal accidents. This crossroad, as with the Easton Grey to Norton Road, are the subject of a LHFIG initiative seeking to improve road safety.

The parish remains concerned about the increased risk of flood downstream, particularly at "The Splash" at Norton and to the properties potentially impacted by the proposed Scheme in Norton, Corsham and the Somerfords and indeed potentially further downstream. Please see the detail referenced below.

Without referencing and listing in detail the lack of adequate response to all our concerns we take as an example our concerns about the risk of increased flood caused by water running off the huge panels. The paper prepared by Professor Richard Skeffington entitled Modelling Enhanced Runoff from Solar Panels at Lime Down Farm [p145 et seq REP5-130] resonates with the common-sense knowledge and experience of the power of concentrated water to create channels and change ground conditions. The river system round here, in heavy rain, already struggles and additional flow if not absorbed by saturated ground is likely to cause further flooding.

The Parish remains of the view that Lime Down is the wrong scale in and the wrong place and that the harm caused will be very significant lasting for over 60 years (taking account of construction and decommissioning). There is no benefit whatsoever for the local communities suffering the panels and BESS and it will harm the businesses which rely on tourists – from upmarket hotels like Whatley Manor to pubs and coffee shops catering for cyclists and others. Many other businesses, including equestrian ones will also be severely impacted.

We understand that the Applicants are proposing to seek to mitigate the adverse visual impact by planting hedges and tree belts that, even if adequately watered, will take years to establish. The Applicant have not provided any details as to how these new trees and hedges will be adequately watered and where the water would come from or how it would be distributed. This is a big omission bearing in mind what a massive undertaking it would be. We do not see how, as a matter of commonsense, any such commitments can or would be fulfilled. Anyone who has planted new trees in the last year or so is only too familiar with the watering task involved over the summer months. The closing submissions of Stop Lime Down and others will reference the detail and science behind these concerns, and we urge the Examiners to carefully consider and take account of the points raised. What is clear is that any solution to this using water bowsers in the quantities required is something with which the existing road between Easton Grey and Norton would be unable to cope. Please note the comments in preceding paragraphs concerning road safety.

As a Parish we are very concerned by what happens if a scheme is permitted with important and significant conditions or requirements as to construction, operation or decommissioning. If those conditions are breached or requirements unfulfilled, how can those most affected (the residents of the area) be confident that the conditions will be strictly enforced or enforced at all. The experience of the breaches of conditions by water companies in the release of sewage does not inspire any confidence that a contractor with a tight timetable will not try to cut corners or breach conditions. At the decommissioning stage where is the financial resource against which a breach of condition could be enforced?

We urge the Examiners to recommend against this scheme.

16th October 2026