

Parish of Easton Grey's Relevant Representations

Those attending the July 2025 Easton Grey Parish AGM, or who, being unable to attend had expressed a view in advance were, (with one exception by an individual who has a family member with a business interest in the proposal and one abstention due to a professional conflict of interest) unanimously opposed to the Lime Down solar proposal.

Easton Grey's submissions on the statutory consultation and targeted consultation have been substantively ignored by the applicant.

The position remains unchanged following the submission of the application notwithstanding the minor changes made by the applicant. As a small parish we have no funds to obtain expert advice on the 250+ documents in the PINS Examination library and we are thus at a significant disadvantage in fact checking and/or correcting any misleading statements or omissions.

Many of the grounds of opposition are intertwined and difficult to place under specific headings or the chapters used by the applicants in the Environmental Statement.

Accordingly, as authorised and obligated by the Easton Grey Parish AGM, I make these representations to the Planning Inspectorate opposing the application but reserving the right to raise further issues by way of Written Representations.

A. LANDSCAPE AND VISUAL

The core of the Easton Grey Parish is a Conservation Area and almost the entirety of the Parish lies within the Cotswold AONB/Natural Landscape.

The village includes an ancient monument in its bridge over the River Avon at the centre of the village.

Easton Grey and the area of the Lime Down project are within the Cotswolds which is known internationally for its history and beauty. Lime Down lies in the setting of the AONB/Natural Landscape.

As a rural area we rely in no small way on tourism and agriculture for employment. The former is very much reliant on maintaining the beauty of the area with uninterrupted views and historic walks including over bye ways and public rights of way.

The applicants intend to use 4.5m tracking panels for the most part, or, if that is not possible, 3m panels. Despite statements about mitigation by planting, panels will be visible from properties within Easton Grey and the rolling long views for people using the road from the National Landscape of Easton Grey towards Norton (car drivers,

cyclists, horse riders and walkers) will be severely impacted. For example panels in fields B6-9 will be clearly visible.

While these are just examples specific to Easton Grey, the proximity of enormous panels protected by fences and CCTV and supported by noisy infrastructure (inverters and transformers) so close to country roads and Public Rights of Way in other areas of Lime Down would permanently change the landscape which is the reason so many people choose to live in and visit what is now an exceptionally beautiful and peaceful area.

In addition to the panels and inverters there would be well one enormous 400kV transformer with a height of 13m and multiple 132kV transformers with a height of 7m all placed on concrete and piled to significant depths and surrounded by high security fences and a battery storage area on a concrete base over an area of up to 5.5 hectares (13.5 acres). Industrial equipment of this scale is wholly unsuited for this area. Many of these changes cannot be mitigated which appears to be accepted by the applicant.

FLOOD AND RIVER POLLUTION

Easton Grey is particularly sensitive to flooding. The bridge in Easton Grey (which is an Ancient Monument) does, if the river rises, act as a dam and will potentially flood properties and the sewage treatment plant which serves 12 of the houses in the village. The gardens of the properties adjoining the river are already subject to flooding. Several buildings in the village are very sensitive to any change in the water flow through the bridge.

The applicant's ES Chapter 11 seems almost solely concerned on whether the infrastructure within the red line would be flooded and does not address the risks to Easton Grey and indeed other villages and towns on the Avon and Gauzebrook which rise dramatically and quickly in the event of heavy rain as surface water cannot be absorbed quickly enough and runs into those water channels.

There appears to be no proper analysis as to the effect of thousands of enormous panels, which would be horizontal at night. These panels would, by acting like a "roof", reduce the absorption capacity of the soil below and increase concentration of the water which would run straight into the Avon and Gauzebrook in times of significant and/or sustained rainfall.

As a matter of common sense, solar panels on this scale will have the effect identified above. See plate 3.3 in APP055 for image of panel in horizontal position and the areas of ground below which would be covered by this kind of panel. The development will make what is already a difficult situation far worse as a result.

So far as we are aware there is no solar development of this size using this kind of panel, and certainly not in an area with this kind of geology and so it is unclear how any

proper assessments of increased flood risk could be made. We cannot overemphasise the lack of tolerance and susceptibility to serious flood issues if changes to the river flow occur.

In the recent Storm Claudia the Easton Grey bridge coped but the river rose from 0.4m to over 1.06 m to within in a few hours as a result of surface run off. The impact of huge numbers of panels, not to mention the compacted soil from construction and the vast amount of concrete needed for the infrastructure and risk to current drainage channels which have worked so well for centuries does not appear to have been considered adequately and is a serious and unacceptable new risk to Easton Grey and other villages and towns downstream from Lime Down.

The threat to the village is exacerbated by the fact that the sewage treatment plant that serves most of the village sits beside the Green in the centre of the village before discharging into the river. The location and levels are shown in a measured plan done by D&H surveys. The position in this regard is noted in the Easton Grey Flood Plan.

The result of increased risk and magnitude of flood will not only be to properties but to rainwater entering the sewage system. It is of note that the licence granted by the Environment Agency South West Region (consent number 101899 and dated 13th May 2002) has a condition that surface water will be kept separate from domestic effluent. It is not apparent that the applicants have given any consideration to the risk of increased surface water and its effect on flooding and pollution nor how the affected householders in Easton Grey would be held harmless from such effects and potential legal or other action arising from a breach of the EA licence where the causation is, with advance knowledge, the fault of others involved with promoting and constructing Lime Down Solar Park.

CUMULATIVE EFFECT

Lime Down is of an industrial scale. Each of the 5 areas A-E would itself be considered an NSIP. The cumulative effect of those 5 separate areas would effectively change for ever an area of 46 square kilometre. It is noted that despite reference to mitigation it has been acknowledged that the panels and other infrastructure will remain visible. The proposal is completely inappropriate to our area with its AONB/National Landscape, Conservation Areas, listed buildings and ancient monuments, including the historic unmade up areas of the Roman Fosse Way. The area that is a gateway from the M4 to the Cotswolds and, not least to Easton Grey, will be changed from a welcoming rural landscape into an industrialised zone.

The size and scale of the panels and the associated inverters, BESS and transformers is unlike anything which has been built in the UK let alone in an area of exceptional landscapes and heritage. Statements in the ES that assumptions have been based on

similar projects are misleading since no similar projects have ever been built, certainly not in England or in an area so close to the National Landscape.

There are already many smaller and more sensitively located solar developments in the area.

LOCAL AMENITY

The entire area of the proposed site of the Lime Down Solar Park is intersected by an ancient network of public foot paths, bridleways, and other bye ways (together “Recreational Routes”). Of particular historical note are the Fosse Way and the North Wessex Way. There are many miles of Recreational Routes that would be affected by Lime Down.

These Recreational Routes are regularly used by locals and tourists alike for walking and riding, dog walking and cycling. These Recreational Routes are well known and by way of local example see <https://hiiker.app/trails/england/wiltshire/easton-grey-loop>

The vast acreage of solar panels, including the areas dissected by public footpaths, are to be enclosed by 2.5m wire fences. This means that walkers, riders and other users of many of the Recreational Routes will, instead of having views of open countryside, and on footpaths be in a narrow, fenced “channel” surrounded by runs of 4.5m high solar panels.

As the panels are to be tracking and supported by conversion units there will be constant movement and noise so instead of the peace of the countryside the feel will be of an industrial site. This will negatively impact the use of the Recreational Routes by horses, cyclists and pedestrians and deter tourists.

Dogs which currently run free will now be constrained in these narrow channels.

Businesses in and around Easton Grey which benefit from visitors who want to stay in an area of beauty and peace will be negatively affected.

NOISE

The noise from infrastructure will be constant and intrusive. This is particularly the case for those who live or work near the transformers and the BESS. This will also have an adverse effect on the mental well being of our community.

During the construction phase there will be pile driving on a scale which is almost unimaginable. The applicant’s documents say each panel would be secured via metal posts driven into ground to an approximate depth of 1.5 m to 4 m. The 132kV and 400kV substations will have piled foundations to a depth of 12 m. The noise from that would be appalling. It is likely that many of the piles will be into bedrock.

BESS

Apart from the inappropriate size of the BESS (with up to 270 huge BESS containers to house vast numbers of lithium batteries) it is far larger than required to store energy produced by the panels at virtually all times and is, we understand, a profit generating aspect of the scheme. Indeed, we understand that the scheme has an input capacity from the National Grid of 250MW which shows what is really intended. We also have serious concerns about the risk posed by the BESS were a fire to break out. The fumes from lithium batteries are toxic. Such fires are notoriously difficult to extinguish. The BESS is very close to Hullavington and to the mainline railway from London to Bristol and on to Wales.

ECOLOGY AND BIODIVERSITY

There are many assurances in the documents of how Lime Down Solar Park will improve biodiversity. None appears to take proper account of the impact that 2 years of construction and the addition of fences would have, nor how birds and bats will be impacted by vast swathes of shiny surfaces and noise.

There is no adequate information about who will be responsible for maintenance of the proposed ecological mitigation zones or who will be responsible for the ongoing welfare of the trees and hedges which are said by the applicant to be necessary to mitigate the harm. Easton Grey as a small community has absolutely no funds available to give any assistance and/or take on any obligation or liability. Further, given the scheme is supposedly 'temporary' (which is a dubious suggestion because of its length), it seems all of these benefits said to come with the scheme will be left to go into disrepair and lost anyway.

There is a significant lack of detail in relation to the destruction of hedgerows and trees which will be necessary to allow access by HGVs to the access points identified.

The lack of detail in relation to the panels and the glint from them and security lights, and the noise from the motors and other infrastructure makes any assessment of the impact on sensitive animals and insects, during the operative period of the scheme, let alone during construction, impossible to judge and something which needs to be carefully considered during the Examination.

HERITAGE

We are concerned that there are to be panels on fields close to the Fosse Way where important artefacts have been found e.g. field B6. Many archaeological remains have been found by local enthusiasts. At Easton Grey there is an important Roman settlement.

ROADS AND TRAFFIC

The local roads are wholly unsuited to the number and size of vehicles which would be required to construct Lime Down.

For those in Easton Grey (and there are issues for others not addressed in these representations) the number of HGVs (even on the applicant's figures) which would use the road towards Hullavington, which is the main route from Easton Grey to Exit 17 M4 or Chippenham is 76 per day. These are the applicant's numbers and are believed to be significantly underestimated. The road is not capable of taking HGVs passing each other. It would make the road effectively unusable and/or dangerous for drivers, let alone cyclists who use this road in large groups. The road is simply unsuitable for this level and type of traffic.

For other areas of Lime Down there are also serious traffic issues and the narrow country roads with dangerous bends used by horse riders, pedestrians and cyclists, as well as cars could not cope with the increased traffic.

The suggestion that most of the construction workers would come in minivans seems fanciful. It is inevitable that cars will try to cut through Easton Grey to get to Lime Down sites and the road is already dangerous with regular accidents.

Any increase in traffic will further damage the verges to what is, in Easton Grey's case, on the road from the B4040 to Norton, a single track road with passing places.

The increase in usage of the roads leading to Lime Down will be caused by closures of other roads to facilitate the construction of Lime Down and will be a further detriment to the residents of Easton Grey and neighbouring villages. Alternative routes will already be affected by other elements of Lime Down, particularly the A429 between Corston and the "Go Karting" roundabout.

Further disruption to traffic will be caused by the works to create the cable route, details of which have not yet been provided.

MAINTENANCE AND DECOMMISSIONING

There is no information about who and how the responsibility for maintaining the biodiversity areas, new planting or the clean up costs will be met and secured. Reliance on there being a criminal sanction for failure to comply is of no use when the owner of Lime Down is a single purpose company and likely to be owned by foreign investors.

PROCUREMENT

There is no explanation of where the panels will be manufactured. How can there be a guarantee that the solar panels and the lithium for the batteries will not be from sources which use slave labour or that there will not be security issues for infrastructure sourced from China.

ALTERNATIVES

The justification given by the applicant for selecting this area seems to be that the land was offered on a voluntary basis. The terms on which landowners have granted options over land, including the duration of the applicant's rights is a closely guarded secret with a refusal to provide details due to NDAs imposed by the applicant. It is far from clear that the applicant does have rights over the land for the 60+ years it seeks. It certainly does not have rights over the cable route where dozens of farmers and landowners are being threatened with compulsory acquisition if they do not grant options for easements for the cable. The selection criteria used by the applicant should not be accepted at face value. This is the wrong scheme in the wrong area and far too far from the grid connection.

COMMUNITY BENEFIT

As far as we are aware no benefit will accrue to the local community. All electricity generated will go to the main grid and all profits from the power generated and from the BESS trading will go to the owner of Lime Down Solar Park Limited. The ultimate ownership is very likely to be foreign.

The local community and its businesses will most certainly suffer detriment and increased risk of flooding, reduction in property prices and the ruination of areas of particular natural beauty and historic interest, right beside an area of Natural Landscape.

During construction the roads will be impassable preventing people from getting to work on time or getting to schools. No new jobs will be created for locals. The community loses in every way. The only people to benefit are the landowners who have contracted on unknown terms to allow their land to be used.

CARBON BENEFIT AND GREEN CREDENTIALS

So far as we are aware there is no material to explain how the panels and lithium batteries which will have to be replaced on a number of occasions will be recycled. There is clearly a huge carbon footprint in sourcing materials from (probably) China and in the construction of the infrastructure over the 5 sites and the very long cable route to Melksham.

CONCLUSION

Easton Grey Parish opposes Lime Down for the reasons given above and reserves the right to raise further points as the missing details of the scheme are developed and further details of what is planned are assessed from the tens of thousands of pages of material which have been submitted by the applicant.

