

St Paul Malmesbury Without Parish Council formal response to Lime Down Solar Park EIA, document Ref:EN010168

This is the formal response of the St Paul Malmesbury Without Parish Council (SPMWPC) to the proposed Lime Down Solar Park development. It has been prepared specifically to respond to the applicant's submission of a scoping EIA (Environmental Impact Assessment) document to the Planning Inspectorate dated the 16th of July 2024.

1. The Applicant should Scope In the effects of run off rainfall and its potential to cause flooding beyond the Application site as a result of a substantial part of the 2,000+ acre site being covered by impermeable solar panels. The Applicant should Scope In run off into the main River Avon, and the parts of the Gauzebrook that affect Corston because of local concerns that flooding already occurs which with additional run off could overwhelm the Gauzebrook in this area. Given the proximity of the Hullavington Sewage Works any substantial increase in the water level could carry sewage into Corston. The Applicant should scope In assessments of Sustainable Drainage Systems (SuDS) to identify whether SuDS could assist those communities that could be affected by increased flooding outside of the boundaries of the Application site.
2. The Applicant should specifically Scope In within Chapters 10 and 11 the impact of run off on the important water aquifers that sit beneath the site and contain large and regionally important sources of drinking water for the locality and well beyond. This should include the major aquifer by Rodbourne Rail farm. This Scoping In should cover both the construction and operational phases of the whole Lime Down scheme. SPMWPC contend that it is insufficient for the Applicant to rely on good practices solely referenced within the Construction Environment Management Plan (CEMP) as the CEMP is not an environment assessment tool.
3. The Applicant has not made it clear which local roads are Scoped In therefore SPMWPC request that all local roads around the villages of Rodbourne and Corston are included, not only in the construction phase but also during on-going maintenance and decommissioning. The proposed route through Rodbourne is a single track road not designed for large vehicles and is frequently used by pedestrians, cyclists and horse riders.
4. The Applicant has only considered glare in relation to humans, however this problem will also affect livestock, particularly the very adjacent facilities focussed on high value horse rearing in site E and parts of site D. Furthermore the fact that the panels rotate to follow the sun exacerbates the problem to livestock because the noise from the motors is likely to produce additional agitation to these high value animals and hence negatively impact the businesses involved. This factor needs to be Scoped In.
5. The Applicant should Scope In within the LVIA (Landscape and Visual Impact Assessment) the impacts on the "settings" of Historic Assets as well as the impact on the Assets themselves.
6. The Applicant should re-examine the selection of LVIA viewpoints to ensure they are representative of the true visual impact of the scheme. From limited sampling it would appear to SPMWPC that some viewpoints minimise the visual effects of the development.
7. The Applicant should Scope In the effects of the development on all Protected Species, such as slow worm, dormouse, grass snake, and not just those species currently identified.
8. SPMWPC request that the Applicant Scopes In the suitability and ability of the local emergency services to respond to damage or fire to the Battery Energy Storage System (BESS). Given the vast size of the BESS any fire related incident is likely to spread very rapidly and could quickly develop into a major incident. The station at Malmesbury is part-time and is likely to require additional manpower and training in these types of emergencies, as would the full-time station at Chippenham. Furthermore, the impact upon air and soil quality and ground water contamination in the event of an incident at the Hullavington BESS should be Scoped In.