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14th August 2024

Re Lime Down Solar

Environmental Impact Assessment Scoping Report (EIA) (reference EN010168)

At the Malmesbury Town Council planning and environment committee meeting on 13th August 2024, it was resolved to request amendments to the Environmental Impact Assessment (EIA) by way of increasing the factors in scope – namely;

1. Flood Risk

At present, the consideration of risk of flooding risk is limited to the area housing the panels only. MTC believe further consideration should be given in respect of water "run-off" to immediate and indirect rivers and streams – many of which will directly affect Malmesbury which has a recent and significant history of flooding.

Recent developments in and directly around Malmesbury which include Sustainable Underground Drainage Systems (SuDS) should also be reviewed as part of this assessment, reviewing their suitability for the above.

Malmesbury Town Council request that a Flood Risk Assessment and consideration of water-run off is conducted and included in the EIA to incorporate a wider area to include Malmesbury.

2. Water Contamination/Ground Water

As the area occupying the potential development site for Lime Down is a drinking water source (the aquifer is under the development and is utilised by Malmesbury and beyond) and as such is designated a Source Protection Zone by the Environment Agency, Malmesbury Town Council request that a suitable analysis is conducted as part of the EIA in relation to safe drinking water and the potential impact of this development.

3. Soil Contamination

Given the prolonged (2+ Year) period of construction for the proposed site, Malmesbury Town Council request that further assessment is included in the EIA in relation to soil contamination relating to both the construction and any future event, including damage to cabling, panels or BESS facilities.

4. Traffic & Transport Management

Currently any impact arising from construction traffic or diverted traffic is not assessed in relation to neighbouring settlements, including Malmesbury. Malmesbury Town Council strongly object to this omission and request the scope is widened to include impact on Malmesbury – such disruption is very likely to have a material impact on the town, including trade, access and tourism.

5. Consideration for Emergency Services

Hullavington is designated as a potential site to house the development's Battery Energy Storage System (BESS). Given the increased risk this poses, including that of damage and fire, Malmesbury Town Council strongly request further consideration is given to the suitability and additional training requirements required by Malmesbury's resident part-time Fire Service, given they would be likely to attend an incident. Further consideration must also be included in the EIA for any impact on air quality and ground water contamination resulting from an incident at the Hullavington BESS.

6. Visual Assessment

At present, Malmesbury is out of the scope area (2km) for Visual Assessment and request in the strongest terms that the scope area should be increased to 5km to include Malmesbury.

Malmesbury has a unique visual footprint, both in and outward of the town, and it's prominent hill-top placement means the visual impact of the proposed development will apply to Malmesbury.

Proposal ends.

Cllr James Slade Chair - Planning & Environment Committee Malmesbury Town Council