

Parish of Easton Grey's response to statutory consultation on proposal for Lime Down Solar Park

Preliminary and general comments.

We refer to the consultation letter dated 29th January, the Public Consultation Plan ("Plan") sent to residents and the Project Information Booklet dated January 2025 available at IGP consultation meetings and on the Lime Down website.

As a small parish we have no funds to obtain expert advice on these documents or on the 4000 pages of material in the PEIR published on the start date of the consultation. We are thus at a significant disadvantage in fact checking and correcting any misleading statements or omissions.

The vast majority of residents only received the Plan which was sent by post.

It is noted that, whilst within the area of the Plan, the villages of Alderton, Grittleton, Luckington, Easton Grey, and Stanton St Quintin and the town of Malmsbury are neither identified nor named. This gives the impression that the only town, and 50% of the villages within the area of the plan will not be affected or simply do not exist. It would be much easier to understand the proposal had the Plan utilised/replicated/overlaid the Ordnance Survey.

We also note that a discontinued airfield from the second world war is marked as "Hullavington Airport".

The Plan does not identify and include the recreational routes that appear on the Ordnance Survey Explorer Map Series sheet 168. The Project Information Booklet likewise also omits recreational routes. See for example the plan at 6.1 re Lime down A on page 15 of the Project Information Booklet.

Whilst noting the major water courses the minor water courses that feed the river system and in particular the Sherston branch of the River Avon are not identified on the Plan.

There is nothing on the Plan to indicate the extent of traffic or the routes which will be used.

These omissions are either deliberately intended to be misleading and/or demonstrate that IGP is ignorant of the areas surrounding and within which they plan Lime Down Solar Park and the impact it would have.

The detail which can be found in the PEIR – running to 4000 pages - is not something which local people can realistically understand or be expected to understand. This makes the misleading impression given in the Plan all the more serious.

The following are the more specific points that we have at this stage but we reserve the right to raise further issues in due course. Given the lack of clarity of the document sent out for consultation we question whether a proper consultation can have or has taken place.

Easton Grey

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. This is not apparent from the Plan or the Project Information Booklet.

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.

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.

As a community we do not object to renewable energy. However, in the case of solar it should and can be placed within the existing built environment or brownfield sites and nearer to the grid connection to avoid a long and as yet unspecified cable to Melksham and not on BMV land or areas of archaeological or historical significance.

Flood risk and potential pollution to the river Avon

Easton Grey is particularly sensitive to flooding. As an area outside the red line of the Lime Down site the authors of the documents supporting the proposal seem to be ignorant of the specifics that apply to Easton Grey and the increased risk and damage it will create.

We refer to the attached report prepared by Professor Richard Skeffington in relation to Storm Bert. We also bring to your attention the government managed measuring station where the Fosse Way crosses the Sherston branch of the river Avon. In that regard please see <https://check-for-flooding.service.gov.uk/station/3035> . This measuring station is circa 1km downstream from the bridge at Easton Grey, which is, as already noted, an Ancient Monument.

The report notes the river flows on the occasion of Storm Bert and the higher levels that occurred in November 2012 (see page 6). The report details the effects of Storm Bert at Tanners Hill Bridge and Forlorn Bridge (see pages 10 and 11). All of the water collecting

at those bridges are up stream of Easton Grey and, with additional water entering from water courses over the intervening route of the river, flow down to Easton Grey. At page 11 of the report the effect of the flow restriction which causes backing up is noted and the same effect occurs at the Easton Grey Bridge see page 13 of the report and the photograph below showing the arches of the bridge almost completely filled by the raised water levels.



In effect the bridge, once the water rises sufficiently, acts as a dam causing the water to back up into the centre of the village causing a potential serious flood issue to residential properties. To date this has not occurred but any increase in surface water entering the river upstream from Easton Grey increases that risk.

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 (attached).

We understand that solar panels will increase water concentration which will in turn concentrate flow rates as the river passes through Easton Grey. The report concludes that we are in an area where it would be easy to increase the frequency and intensity of flooding by inappropriate development such as Lime Down Solar.

We adopt the points made in that report in their entirety with the following additional comments.

The result of increased risk 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. Given the noted increase in risk to flooding and pollution has any consideration been given to this and if so, what? How are the affected householders in Easton Grey to be held harmless from such effects and potential legal or other action arising from a breach of the referenced licence where the causation is, with advance knowledge, the fault of others.

The development size and its location.

The proposed Solar Park is of an industrial scale. Each of the 5 areas A-E is very large and the cumulative effect of those 5 separate areas would effectively change for ever an area of 46 square kilometres . It is noted that despite reference to mitigation it has been acknowledged that the panels and other infrastructure will remain visible. The proposal completely inappropriate to our area with its AONB, Conservation Areas, listed buildings and ancient monuments, including the historic unmade up areas of the Roman Fosse Way.

The size and scale of the panels is unlike anything which has been built in the UK let alone in an area of exceptional landscapes and heritage.

The materials provided as part of the consultation are extremely difficult to read and in some cases positively misleading. The image provided of a BESS storage area, an image shown at the consultation meetings, is not what is proposed for Lime Down. Instead of what appears to be a CGI or photoshopped image of a small, gravelled area with 6 rows of storage containers (taken from an angle which masks the scale of the units) what is proposed for Lime Down is a BESS with up to 270 shipping size containers covering an area of up to 25 acres (equivalent to 16 football pitches) close to a Grade 1 listed house. All that area will need to be hard surfaced surrounded by metal palisade fencing and CCTV and will emit a constant noise of cooling units in an area which is currently quiet and dark.

We will lose quality agricultural land. Even on IGP's figures 30% is BMV.

What consideration has been given to siting the proposed solar park in more suitable locations?

Adverse effects on tourism and 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.

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, be in a narrow, fenced "channel" surrounded by runs of 4.5m high solar panels.

As the panels are to be tracking 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.

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.

Adverse Visual and Noise Impact.

We have already noted the security fencing and apparatus. The panels are to be 4.5 meters high, unlike the panels one sees by the edge of the motorway, and positioned on undulating land and cannot be adequately screened, even after 15 years. We understand that the panels are to be motorised and move to follow the sun. This will create an increase in the negative effects of glare and produce noise pollution to an area noted for its tranquillity. This will also have an adverse effect on the mental well being of our community.

BESS

Apart from the inappropriate size of the BESS, which is larger than required to store energy produced by the panels and is, we understand, a profit generating aspect of the scheme, we 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.

Ecology and biodiversity

There are many assurances in the documents of how Lime Down Solar Park will improve biodiversity. However without key documents to support the statements it is not possible to assess and comment on how Lime Down would impact ecology and biodiversity or the extent to which mitigation measures intended to protect local wildlife will be adequate.

There is no information about who will be responsible for maintenance of the proposed ecological mitigation zones. During the consultation conflicting answers were given by IGP representatives on this.

There are no maps showing the precise extent of the proposed buffer zones and again, no information as to who will be responsible for their effective management during the lifetime of the scheme.

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.

Traffic

There is no adequate indication of exactly what “road improvements” will be made to enable tens of thousands of HGVs to access the sites. The area around Lime Down is made up of narrow rural roads, used by horse riders and cyclists as well as the community. The increased use of roads is likely to increase the danger of accidents to cyclists and horse riders.

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.

Replacement, clean up costs and decommissioning

Inconsistent answers were given at the consultation meetings about how frequently the panels and batteries would need to be replaced. There needs to be clarity about this since if the panels were to be replaced it would cause further disruption.

There is no information about who and how the responsibility for clean up costs will be met and secured. This is the case not only for the potential adverse impact already noted during the existence of the plant but also at the end of the plant’s life.

There is a total lack of transparency about who the owner of the plant is likely to be if IGP sells its shares in Lime Down Solar Park Limited, a company incorporated in 2021 with no significant assets.

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?

Lack of Benefit to the Local Community

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 suffer detriment and increased risk of flooding and the ruination of areas of particular natural beauty and historic interest, right beside an area of Natural Landscape.

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.

9 March 2025