

## Initial Notes from the Response by GE Consulting

**Ref: 1912-TN-NH 16 October 2024**

- 1) As this document 'utilises additional supporting information where appropriate' then additional comments from the Public should be allowed. Furthermore, Mr Harris should be allowed to comment as information he supplied last February is specifically referenced.
- 2) If the 'Permanent on-site grid connection hub' is allowed, the extent of solar development cannot be controlled. Permitting this proposal will set a precedent that solar panels are suitable in this valley, allowing neighbouring farmers to accept options from the Developer (or future developers) to connect to this permanent hub. There is already evidence of adjacent landowners 'setting aside' land.
- 3) Irrefutable facts agreed by all parties – there are numerous protected species on and around the site, including bats, badgers, dormice, birds, great crested newts, hedgehogs, reptiles (possibly slow worms as there is suitable habitat). Their habitat should not be disturbed by anything other than agricultural or forestry practices.
- 4) The original report cannot fully acknowledge anonymised records, which are by their nature, vague and anonymous to protect the exact location of the protected bats. They need to undertake further surveys. 'Likely commuting routes' are not sufficient to determine the full impact of this industrial development. Furthermore, the habitat for Barbastelle bats includes 'wet, deciduous woodland' – the Applicants have specifically left an area of this habitat within the site un-surveyed – a point that has continuously been raised.



- 5) Activity surveys are required due to the importance of the bat species already identified, in addition to the need to identify the commuting routes. The Applicants do not want this data, as it has a high potential to prove a significant impact and additional on-site roosts.
- 6) The report does not address noise and the impact to bats/other protected species.
- 7) The land has not been managed intensively – quite the opposite – it has also been entered into the Countryside Stewardship Scheme.
- 8) These are 3.2m tall and 6.68m wide solar panels due to the poor location (some northerly aspects) and shading on the site – these massive panels will provide significant shading and are highly likely to provide an adverse micro-climate beneath them. There are many studies that also suggest that the biodiversity will deteriorate. It is not 'likely that the diversity of plants and invertebrate prey will increase'. The applicants have been asked for photomontages/shade assessments yet these have not been submitted.

- 9) The landowner's attempt to plough up the bio-diverse field margins is futile – the area of orchids was missed and the diversity has been developed over years under the Stewardship Scheme.
- 10) There is grassland being converted to solar – at least 50% of the site is grassland. This is 'permanent grassland' that provides ideal habitat for ground nesting birds.
- 11) You do not rotate permanent pasture – it is a permanent feature on this farm and does meet the skylark criteria – has the author of this report been to the site? This should not be developed for a solar farm which may possibly provide suitable habitat – as noted above, shading from the proposed vast panels is likely to prevent this.
- 12) There is an ecological equilibrium on the site that has allowed protected species to survive. The addition of all the man-made industrial features into this site will destroy this equilibrium and no form of mitigation will ever mitigate against this loss.
- 13) There is so many contradicting comments in regard to proposed mitigation for impact that should not be permitted. For example, fencing to the ground to protect ground nesting birds from dogs yet now a 150mm gap for brown hare. What about deer and other quadruped wildlife on the site (badgers for example). Fencing will prevent the continued active use of the site by the larger quadrupeds – will a 15cm gap really allow the hares to access the site?
- 14) 20 bird boxes over 200 acres is such a minimal mitigation on a site with so many birds that will have to adapt (if possible) to a completely changed environment in terms of noise, glint/glare, fencing and massive solar panels (let alone other foreign features such as cameras and a sub-station).
- 15) Not all the ecological features have been surveyed.
- 16) There is no reliable assessment of existing biodiversity and the landowner is currently ploughing areas which had previously been enhanced for biodiversity under the Countryside Stewardship Scheme. The destruction has occurred as a direct result of the current application.
- 17) It is Easterton Sands not Eastington – there is no detailed knowledge of the area, let alone the ecology on the site.
- 18) Allowing the application with the promised additional information is not appropriate – there is insufficient information to make an informed decision.
- 19) The alternative use of the site as part of the BAP for Wiltshire must be considered. It represents a extremely valuable opportunity to prioritise the re-connecting the fragments of ancient woodland. The landowner has previously been open to grant schemes to enhance the biodiversity of the site, as shown by the Countryside Stewardship Scheme.
- 20) An on-site meeting with the County Ecologist would be very welcomed.

