

Planning Application Reference: PL/2023/10332 – Potterne Park Solar Farm, Potterne, (Site)

Response from Potterne Parish Council

0-Introduction

0.1 The proposed Solar Farm at Potterne Park Farm (PPF) is a vast 200-acre Site on a north-facing slope within a beautiful tranquil rural area. The Potterne Wick valley has remained untouched since the railway was introduced in the early 1900's and as a result has largely been cut off from modern development. This has resulted in the preservation of an area rich in wildlife and essential for the protection of rare species of birds, bats and other animals – as well as an important sanctuary for the physical and mental well-being of those living in Devizes, Potterne, Easterton, Market Lavington and surrounding villages.

0.2 The north-facing aspect of the Site has meant that the proposed development is sub-optimal and a poor choice of location. In the wider context of the national grid the Application offers no energy resilience or benefits to Wiltshire residents.

0.3 Residents of Wiltshire have a good track record of supporting well thought through and beneficial solar Applications, however this is the wrong Application in the wrong place and **does not have the support of the people of the area, the wider village community or the local parish councils.**

0.4 The key points for rejecting this Application are:

- This proposal is **contrary to Wiltshire's Strategic Objectives** (Section 1, below)
- The proposed **benefits are exaggerated** (Section 2)
- The Application is **contrary to the core policies within the Wiltshire Core Strategy** (Section 3)
- The Application exacerbates **problems for The Grid** and there are **technical limitations to the proposal** (Section 4)
- The problems with **access** are significant. (Section 5)
- There are serious doubts about the **credibility of long-term operation and maintenance arrangements for the Site** (Section 6)
- There are clear **failings of due process** in the application (Section 7)
- The proposed development is **contrary to the Neighbourhood Development Plan.** (Section 8)

0.5 We have been given no option but to respond at such great length simply because Stark Energy's major development contains some 600 pages of information with their application.

The applicant, given their alleged experience in these types of developments, has had ample opportunity to provide accurate and complete information. It should be noted that these objections prepared by a small Parish Council have identified many of the applicants' omissions and rebutted many of the assertions without having the benefit of 'experts' or financial resources. We do not believe that it is equitable that they should be able to come back and have a 'second bite of the cherry' as they have had ample opportunity to present their case correctly.

Therefore, should the applicant provide any further information/critical surveys, we ask, please, for a further period of public consultation.

This is an unwanted and totally unnecessary proposal that would lead to the permanent destruction of a beautiful valley, amounting to environmental vandalism. Green energy should not be prioritised blindly over green space.

For the following reasons we unanimously oppose this application; and ask that the LPA refuse the development.

Section 1 - This proposal is contrary to Wiltshire's Strategic Objectives (Wiltshire Core Strategy, adopted January 2015)

1.1 Strategic Objective 1.19

This objective headed "*A strategy which will ensure that the most is made of Wiltshire's outstanding environments*".... states "*This means the careful stewardship of our environmental assets so that growth is complementary and does not erode the very qualities that make Wiltshire so attractive in the first place*".

This special valley is within the iconic Pewsey Vale and thereby neighbours the North Wessex Downs Area of Outstanding Natural Beauty (NWDONB). The impact on the landscape of the proposal will be severe. The vast Site is on a north-facing slope, elevated above the valley and visible from practically everywhere in the valley. It is overlooked by a number of households and there are 5 Public rights of way (PROWs) directly impacted by the Site that are well-used by residents and visitors alike. This 200-acre Site is bigger than the village of Potterne itself and is the best part of a mile in length x nearly ½ mile wide. This is not a hidden Application and will destroy the very character of the valley.

1.2 Climate Strategy Delivery Plan

In Wiltshire Council's [Climate Strategy Delivery Plan](#) there is a 'High Ambition Pathway' to facilitate 590MW of solar capacity by 2030. Including recently approved solar farm developments, a total of **819MW** should be operational in Wiltshire well ahead of that time. This means Wiltshire's solar target will have been exceeded by 39% several years before 2030, with still more solar proposals in the pipeline.

In addition, both the distribution and transmission network in this part of Wiltshire are heavily constrained for additional generation capacity for the foreseeable future. Due

to the legacy low-cost connection, this Application isn't paying for network reinforcement. It will therefore further strain the network and will contribute to pricing out more "future orientated" generation Applications (see 2.3 below). Ofgem acknowledge that there are "important alternatives to building extra network capacity" (Ofgem 2019: Our strategic Narrative). Prioritisation should now go to renewable Applications which enhance existing solar capability such as storage, or improve the existing electrical infrastructure, in line with transmission and distribution network strategy. This Application is counter to this strategic direction and is not a "must do" Application for Wiltshire, there are other priorities in the renewable generation space - as exemplified by CPRE's Solar Rooftop Campaign. The additional burden on the grid will restrict residents ability to generate their own power reducing Wiltshire's energy resilience overall, it is the responsibility of Wiltshire Council to understand this and make decisions accordingly.

1.3 Government Food Security Strategy

The Government's Food Security Strategy published in June 2022 stresses the importance of maintaining agricultural land for food production. The Site at PPF regular produces yields of winter wheat and grass that are above the regional average. We cannot afford to lose this quality of land. There is as much need to protect farmland due to the pressures on feeding a growing population (40% of our food is imported) as there is to convert and lose this land area for energy production.

"We will not lose swathes of our best farmland to solar farms" said Rishi Sunak in an article in the Daily Telegraph on 12 December 2022.

Section 2 - The claimed benefits of the proposal are exaggerated.

The LPAs are wrongly being asked to prioritise a renewables investment above other strategic priorities of agricultural food production and protecting a beautiful environment, based on misleading evidence:

2.1 Legacy Connection

Potterne Park Farm Solar proposal is hugely advantaged by a legacy low-cost connection offer, along with other government incentives. This artificially inflates returns in what is a simplistic and inefficient solar farm design which would not be contracted by the District Network Operator (DNO) under current energy policy, as it does not best serve either the local or national interests. In our opinion, the only beneficiaries of this scheme will be the investors and the landowner.

2.2 Green Energy Benefits

Many of the quoted 'green energy benefits' associated with PPFs are either inflated or misleading. 4.7.2 of the Planning, Design and Access Statement (DAS) states:

- a. **"60,000MWh annual generation"**: Based on the nameplate capacity of 49.9MW, this annual generation assumes a solar capacity factor **37% higher than the average** in the UK, and at least 20% higher than achieved by other local systems. The Site's characteristics (north-facing slope, near elevated

woodland) are very likely to impact the inherent efficiency of the proposal, thereby bringing these claims into doubt.

- b. **“21,000 tonnes annual CO2 saving”**: The Department for Business, Energy and Industrial Strategy’s official conversion factor is 0.20707 kg CO2 saved for each kWh produced from a carbon-free source. This would equate to 12,400 tonnes per annum (**42% less than claimed in the planning application**). Estimates of the carbon footprint for the proposed development are totally lacking in the Applicant’s documentation. The developers acknowledge there is a carbon debt associated with the manufacture of the system (with an expected payback of 2 ½ years). There is no mention of the carbon debt associated with the manufacture of the solar panels, or the expected carbon footprint of the 132kV substation (which by analogy to similar infrastructure would have a CO2e footprint of at least 9000 tonnes), or the carbon footprint of the extensive construction phase activity.

- c. **“Approximately 16,000 homes powered”**: This figure only relates to the electricity component of a home. Ofgem currently estimates that a typical household has an annual energy requirement of 2,700kWh of electricity and 11,500 kWh of gas. If the gas component was also converted to electricity as is the intention as society moves away from oil and gas then, using these figures, 60,000MWh would provide total energy for only **4,225 homes**. But given the seasonal mismatch between supply and demand, fewer than 1,000 homes could actually be serviced during winter by this installation.

(These comparisons are taken from A Summary of network aspects related to proposed Potterne Park Farm by Ashley Wilson January 2024)

These are serious discrepancies, guidance to planners states that applicants do not need to justify the case for solar. But the LPA is being asked to balance the claimed benefits against the very real and immediate losses caused to the precious countryside, the wildlife and agricultural land. Inflating the benefits in this way does not help the case for solar nor help the decision maker.

2.3 Grid Connection

The District Network Operator (SSEN) is obliged to honour this legacy connection agreement, which incidentally the applicant has not released to enable a full analysis of the proposed benefits. However, it is the responsibility of the Local Planning Authority to understand fully the potential impact this Application would have on other Wiltshire Council priorities to better support local energy security (such as housing with integrated solar and smaller scale local initiatives). As mentioned, these alternatives will be frozen out by the capacity taken up by this Application. From a grid perspective the investment would be better off elsewhere in a less constrained part of the network.

Even so, once built, the substation/connection point to the network will ensure the Site remains attractive to host electrical infrastructure well beyond the already extended lease term. Therefore, the land is unlikely to ever return to agricultural use - at 50 years the lease term can hardly be claimed as temporary, this will become a

brownfield Site. The more likely scenario is a future proposal for another solar farm alongside the existing one on the remaining 250 acres of the farm to make use of the connection point! **We believe this planning application is pure entryism** – once the connection point is established the likely scenario is expansion. For this reason our references to our NDP (Section 8) are relevant.

Section 3 - The Application is contrary to the core policies within the Wiltshire Core Strategy and planning guidance documents.

The proposal does not meet the thresholds of **CP 42 on renewable energy installations** as claimed – (the proposal will have a detrimental impact on **CP42i the rural landscape, CP42iv the biodiversity of the Site, CP42vi the use of the local transport network, CP42vii residential amenity (visual amenity) and CP42viii Best and Most versatile Agricultural land**).

In addition, the application is counter to **CP 50 on Biodiversity, CP 51 on Landscape, CP 52 Green Infrastructure, CP 58 Conservation of the Historic Environment and CP 67 Flood Risk**.

3.1 Core Policy 42i and 51 - The Landscape

In describing this special landscape, we can hardly improve on the words of the current landowners of the Site, when they were the ones who were affected by potential development next to their farm just six years ago. This is how they described the very land they now want to see covered by solar panels (17/10190/FUL):

*“This is a very peaceful, unspoilt end of the Pewsey Vale and such [proposed development] is totally inappropriate. On our farm we have spent **decades improving the habitat for wild animals**, with considerable success. We have breeding pairs of lapwings, sky larks thrive here, and the hedgehog is making a comeback. The place throngs with hare, roe deer, even dormice have been seen. A PHD student from Bristol followed a rare bat to our farm from its swarming ground near Bath to find its roost in a tree [nearby]. Their feedings are mostly local to the roosts, in the hedgerows and pastures adjacent. The Site itself is close to Oakfrith Wood, a local Nature Reserve and area of ancient woodland. We should preserve and care for these remaining gems, not dig them up and pollute them with fumes and noise”.*

*“This valley is an **historic landscape of trees, hedges and pasture** that was once the hunting park of the medieval bishops of Salisbury. On our farm ... is a Scheduled Ancient Monument, a moated area dating back to the days of the Bishop’s hunting park in the early 13th century. I hope you can appreciate from my observations that **this valley has ecological and historic importance that make it attractive for local people and tourists** and it would be ruined by the imposition of a motocross track”.*

*“The proposed works and resultant activities **would cause significant environmental damage in an area of habitat renowned for a rich diversity of plants, trees and animals**. There are several protected species to be found here, including 2 very rare species of bat (and 9 other bat species), breeding barn*

owls, hobbies, dormice, hares, lapwing and kingfishers to name but a few. These **animals are here because the valley is quiet and relatively undisturbed**, with plenty of trees, hedges, waterways and grassland”.

On their webSite (www.potternepark.co.uk) promoting agritourism in their holiday lodges they state:

“We have put a lot of effort into promoting wildlife on the farm, particularly ground-nesting birds including pheasant and grey partridge. Roe deer are a regular sight, as well as plenty of hares, a variety of owls, and the occasional muntjac. Keen wildlife lovers should keep their eyes peeled! While secluded and peaceful, the farm is also ideally located for exploring the area, including nearby Marlborough and Stonehenge”.

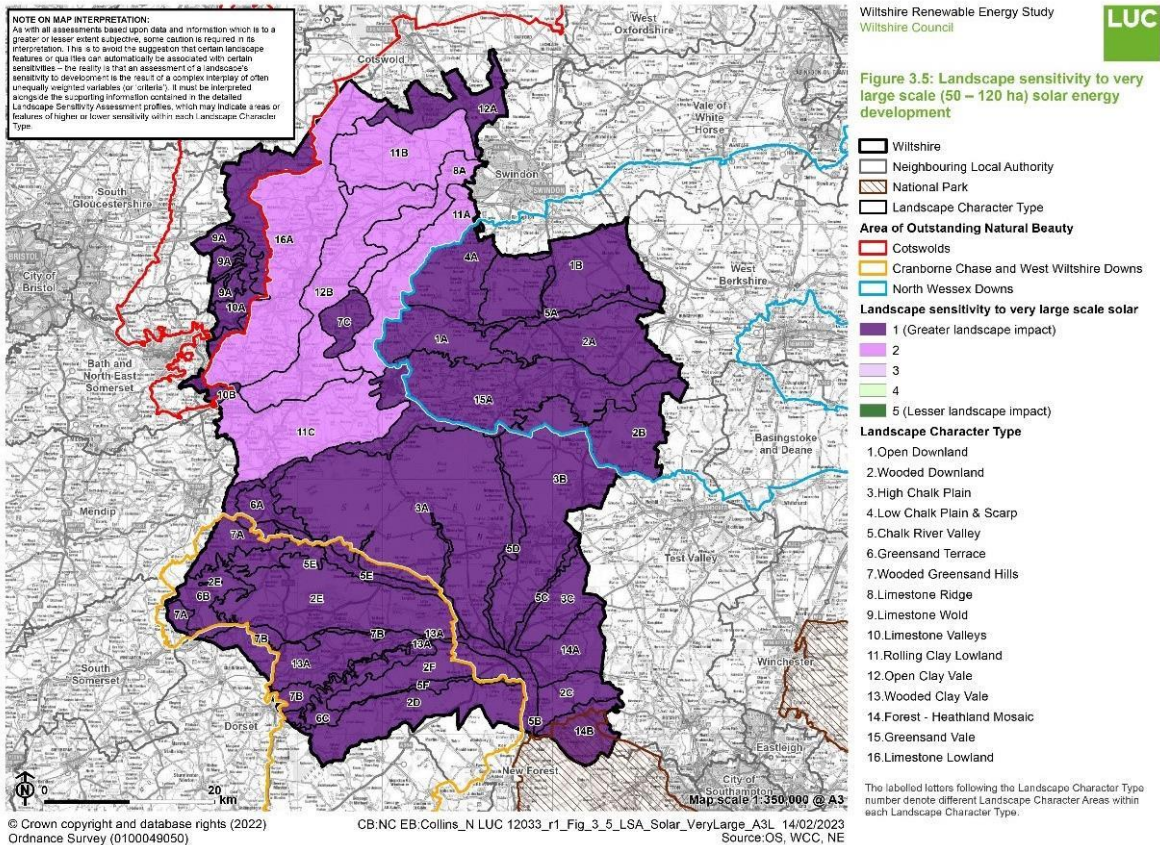
If this application were to be approved, then all the above would cease to apply.

3.2 Critique of the Landscape and Visual Impact Assessment (LVIA)

3.2.1 Landscape Sensitivity Area

According to the *Wiltshire Council Renewable Energy Study (March 2023)* the Site falls on the boundary of Landscape Sensitivity Areas 1 and 2 for very large scale (50-120ha) solar energy development - as depicted in the chart (figure 3.5 of that report) shown below.

Figure 3.5: Landscape sensitivity to very large scale (50-120ha) solar energy development



This is an 80ha Site and the starting point is clearly that very large solar implementations are not suitable nor wanted in this area. The LVIA assessment does not take this into account therefore the starting point for all the assessments are lower than they should be. **This is important context that the LVIA omits to use.**

3.2.2 LVIA Scores

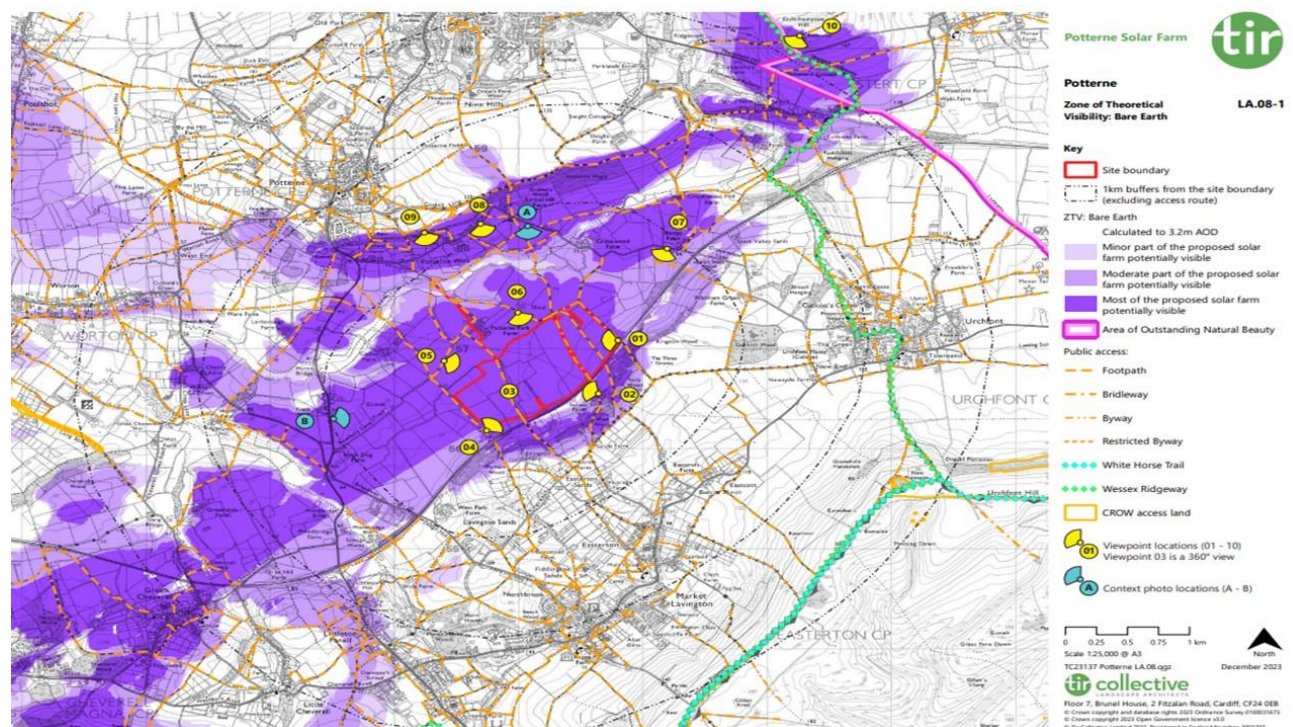
The LVIA focuses on low-lying agricultural land and therefore the Site can only ever score around “medium” value as summarised in Table 4-1 of the LVIA document. According to the Wiltshire Renewable energy study this Site should start as highly sensitive. In addition, the Site is on the edge of a valley (as depicted by LA04 Landscape character chart in the submitted material) which provides important context for visual impact and which is not fully taken into account in the LVIA.

3.2.3 Site Visibility

The Site is visible from everywhere in the valley as acknowledged by the applicant’s own Zone of Theoretical Visibility (ZTV) chart (see chart below). The landscape is in the iconic Pewsey Vale and adjacent to the NWDAONB, which is benefiting from £130m+ of investment removing electricity pylons from the landscape as part of their Visual Impact Provision Application. Such is the beauty of the landscape, a case could easily be made to do the same in this valley. The pylons have been there since the 1950’s. Although not pleasant they have been there a lifetime and the view passes through them as they are up in the air. They are not solid blocks like solar panels. Given the proximity to the NWDAONB, which can be seen from all the PROWs on the Site, it is surprising the LVIA submitted has its starting points for classification so low.

It is clear from the ZTV there will be visual impacts resulting from the proposal that will have adverse visual effects on the setting of the NWDAONB. This is confirmed in the appraisal at Viewpoint 10 which identifies a “Moderate Adverse Effect”, although the sensitivity the applicant ascribes to the receptors in this view is wrong – it should be of “high sensitivity”, which would result in a **Major Adverse Effect on the setting of the AONB**. This would be contrary to national planning policy NPPF 182 which states that:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas ... The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas”.



Given that the Site is highly visible throughout the valley and beyond, how can the magnitude of change during construction be “medium to small” or when operational be “medium”. **It will dominate the landscape** as can be seen by the applicant’s own photos from viewpoints 9 and 10. The view from our own photographs from just below the woodland on the footpath at viewpoint 9 is far worse (panoramic views from the north – Potterne Wick and south – Forest Farm are provided below. Admittedly these are not great photos, but the Site is so large that it is difficult to capture, even so they give a good indication of the impact of the solar arrays on the landscape). This represents a major impact by anyone’s assessment criteria.



3.2.4 Over Emphasis on Decommissioning

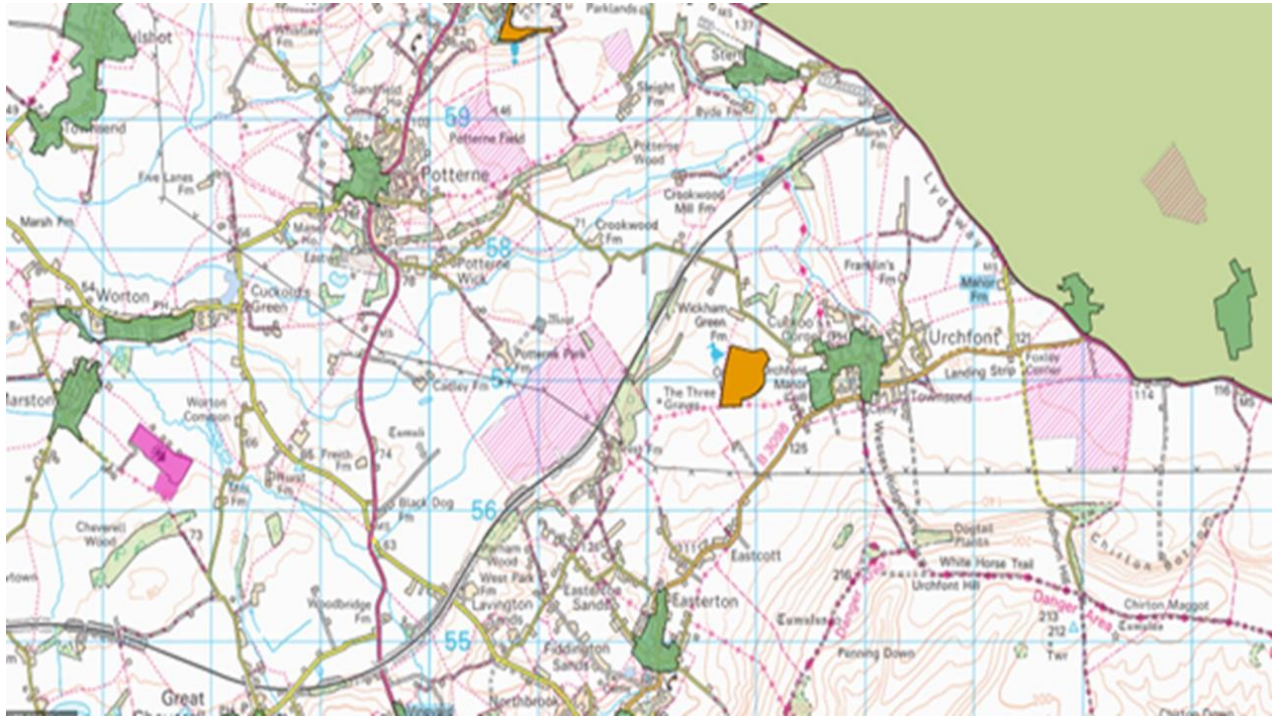
The LVIA document provides extensive information on decommissioning. This outcome is highly unlikely as one is looking 50 years into the future and the substation will likely be occupied on a longer lease (typically 99 years) so it would not make economic sense for this Site to be discontinued and returned to agriculture. Including these irrelevant figures skews the assessment towards a lower impact.

3.2.5 Photography

The photos submitted clearly show a vast area impacted but the annotation is such that an observer not familiar with the area is left unimpressed. The photos are misleading. If they had been annotated showing the solar panels to provide a photomontage, there would be a different narrative.

3.2.6 Cumulative Impact of Other Solar Developments

The Cumulative Zone Theoretical Visibility chart filed does not take into account the solar farms proposed for One Tree Hill and also at Sleight farm and east of Urchfont which are in the pipeline, according to this map in the Wiltshire Council's EIA screening report to this application.



3.2.7 Special Landscape Area

LVIA para 7.2.1 mentions this area is outside the NWDAONB but there is great pressure for this valley to be designated a Special Landscape Area and the Parish Council would support that initiative.

3.2.8 Valley Character

LVIA para 7.2.16 implies impact gets less with distance from the Site. This is untrue. One is overwhelmed by the scale of the solar farm when closer to the fields, but the impact is just as great when full perspective is seen from a distance, as the devastation is seen on the broader landscape - it would permanently change the whole character of the valley.

3.2.9 Weather Conditions

LVIA para 7.2.17 on “weather conditions”, states visibility would be limited because of rain and mist on 171 days of the year, proving **it’s the wrong place for a solar farm!** This number of days is probably understated because the area is also subject to inversion mists which would add to these regional numbers.

3.3 Core Policy 42iv and 50 – Ecology and Biodiversity

Core Policy 50 in the Wiltshire Core Strategy relates to retaining the valuable natural environment including priority species and habitats, and in our view the application fails to comply with this policy.

3.3.1 Delicate Ecosystem

This valley has a delicate ecosystem, and these fields are foraging Sites for a number of bat and bird species. The Ecological Impact Assessment (EIA) fails to

recognise that this is an important wildlife corridor, and demonstrates a lack of understanding on how the wildlife utilises the surrounding area for roosting, breeding, commuting and foraging. The EIA survey data does not assess flight paths or foraging habitats, let alone possible roosts within the Site or on the boundaries.

Potterne Park Farm has a crucial and important relationship to the whole valley environment and ecology, linking Pewsey Vale and Salisbury Plain.

There is a lack of recognition that this is an area of high ecological value interdependent with the **ancient woodlands** of Kingston Wood, Folly Wood, West Wood and Parham wood on the south side and Potterne Wood on the north side. The wide area of this Site would obstruct and reduce the natural wildlife corridors for animals of all kinds.

Also, areas of high ecological value have been completely omitted from the survey altogether – e.g. the woodland immediately to the north of the Site.

3.3.2 Ecological Impact Assessment (EIA)

The EIA in the proposal is superficial and, in our view, dangerously understates the importance of the area to bats and other wildlife. **This application will cause a significant negative impact on the number of species listed below, which are legally protected and of high conservation concern.**

Bats

Expert studies from 2018 show 12 species of bat, 4 of which are endangered, use these areas. All bats are protected under the Conservation of Habitats and Species Regulations 2017 and Wildlife and Countryside Act 1981. **It is of course a criminal offence to remove the habitats of these bats.**

- a. *The Devizes and Stert Valley Bechsteins and Barbastelle Application* states that of the 18 species of bat in UK, 12 are here in this valley breeding and roosting.
- b. Annex II (red listed) of the *EU Habitats Directive* - categorises higher conservation concern for the following rare, protected bat species that roost, breed and forage all across this area. These are records in the public domain and can easily be accessed, yet have not been mentioned or used in the applicant's EIA.
 - Bechstein's Bat breeding population evidenced along greensand ridge as well as Potterne and Devizes. The loss of the features the Bechstein's are using for commuting, foraging and roosting will have a negative long-term impact on the health of the colony.
 - Barbastelles, an exceptionally rare bat, maternity roosts identified and used in West Wood. These bats forage over a very wide area including across Potterne Park Farm. (West Wood is located 100m/150m from solar farm). **These bats are light averse so any human, light, CCTV and human activity at night will have a big impact.**
 - Both the Greater Horseshoe Bat and Lesser Horseshoe Bat, which are extremely rare, are prevalent right across the ancient woodland and these pastures.

- c. Other common and widespread bats here include Pipistrelles, Natterers bat, Whiskered Bat, Brandts bat, Brown Long-Eared bat, Noctule and Serotine bat.
- d. *The Devizes and Stert Valley* Study states this area and farmland is of high habitat quality and food availability means the bats don't have to travel too far.
- e. In previous planning applications (17/10190/FUL) these studies were cited. It was accepted that the application failed to meet NPPF requirements, Natural England's standing advice, Wilts core strategy and NERC Act. This previous application was for 1 field adjacent to the PPF Site. The PPF Site covers at least 7 fields.
- f. There is research by Bristol University on solar farms in the Southwest that proves there is a negative impact on bats (*Renewable energies and biodiversity: impact of ground-mounted solar photovoltaic Sites on bat activity* by Lizy Tinsley et al in *Journal of Applied Ecology* August 2023). A reasonable ecologist assessing impacts on solar farms should be aware of research like this, especially as it was released in August last year. This is not even mentioned in the developer's report.

Birds and Animals

The criticality of the area also applies to bird species and other animals, and the proposal is counter to Wiltshire protection policies. *Natural Environment and Rural Communities Act 2006* imposes a duty on public authorities to conserve biodiversity in England and Wales. Section 41 of the Act refers to a published list of species which are of principal importance to the conservation of biodiversity in England. The following species are present at PPF and on that list:

- a. **Great Crested Newt** – also listed in *Schedule 5 of the Wildlife and Countryside Act 1981* and *Schedule 2 The Conservation of Habitats and Species Regulations 2017*. The developers ecological study stated they could only find evidence in one pond on PPF yet the nearest resident to PPF found 10 in an afternoon. Clearly the survey in the report is inadequate. This area is part of the Great Crested Newts Strategic Opportunity Area (DEFRA)
- b. **Brown hare** - high conservation priority - they need the mixed agriculture, and this major change could result in permanent loss of breeding habitat. The document strangely suggests that the hare can go elsewhere, an odd philosophy for an ecologist.
- c. **Hedgehogs** are present yet in decline.
- d. **Dormice** in the ancient woodland **Hobby** - breeding each year in area around West Wood
- e. **Spotted Flycatcher** breeding in West Wood
- f. **Corn Bunting** - this needs the mosaic of hedgerows, arable fields, scrub and pastures.
- g. **Mistle thrush**
- h. **Linnet, Dunnock, Skylark Kestrel** and other raptors who hunt or live in the valley.
- i. **Harvest mice** recorded in the fields on PPF.

In addition, the Site falls within the buffer zone for the *Stone Curlew Management Strategy* of 6.4km from Salisbury Plain.

3.3.3 Biodiversity Net Gain (BNG)

We challenge the BNG claimed in paragraph 7 of the EIA. Removing topsoil and covering the existing crop and grassland with panels will inevitably reduce biodiversity. This delicate environment has a rich layer of topsoil which has been in place for hundreds of years and is vital to the ecosystem. The highly-fertile topsoil at PPF is not hugely deep, so mixing this with the subsoil and moving this around in the construction phase will reduce its fertility for decades, and then to replace it with strips of wildflowers which are unlikely to take is not a credible way of improving BNG.

The suggestion that the fields can be used for sheep grazing is also not credible. Sheep farming and solar has had poor results, the sheep take time to get familiar with the panels, are difficult to round up and the quality of the grass deteriorates under the panels. There is no specific biodiversity calculation included, but the general method mentions the enhancement of hedges. In this case the applicant admits that most of the hedges will remain, although some will be lost, so the enhancement factor used in the general method itself doesn't apply.

We fully expect there will be a biodiversity net loss not a gain, particularly when the damage caused to the species listed above is taken into account.

3.4 Core Policy 42iii – Agricultural Land

This information is provided by neighbouring farmer Neil Ansell and Ex PPF Farm Manager Philip Francis who have known Potterne Park Farm for years. According to them the fields at PPF have been farmed for decades, and we dispute the proposal that the land is grade 3b and believe the potential is closer to grade 2 on the lower sections and 3a on the slopes. There is no Agricultural Land Classification evidence provided by the applicant.

Looking at the definition (Building on our food security CPRE July 2022)

Grade 3a land is seen as: “Good quality agricultural land — land which can consistently produce moderate to high yields of a reduced variety of arable crops, such as cereals, sugar beet and potatoes”

Grade 3b: “Moderate quality agricultural land. — capable of producing moderate yields”

These fields today produce well above average yields of wheat and grass, and in the past have grown a range of crops including rapeseed, winter and spring wheat, winter and spring barley, winter oats, field beans, peas and triticale. They have also grown non-commercial potatoes in a small area, mechanically planted and harvested, and the fields regularly support cattle as seen on the PPF webSite (www.potternepark.co.uk). There is therefore a stronger case for seeing the potential of this land as 3a rather than 3b. Regardless of academic categorisations it can be seen from the yields below that this is good quality agricultural land, **and** the land is a key component of supporting local wildlife. The farm has been registered under the Higher-Level Countryside Stewardship Scheme such is the value Natural England place on its land quality.

3.4.1 Wheat and Grass Production

In terms of yields:

Wheat Production

- a. DEFRA's observed figures for the 2023 harvest state that the English wheat harvest was 12.8 million tons, a decrease of 10% on 2022. Due to decreases in both yield and area in all regions, yield decreased by 5.2% and area decreased by 5.3%.
- b. The Southwest region showed the largest production decrease at 15% from the 2022 harvest. So, it begs the question - why are we building solar farms on productive land?
- c. It is known that winter wheat grows well at PPF. Conversations with the former manager at PPF of 8 years confirm that PPF produced winter wheat at 9.9 tons per Ha in 1986. Indeed, we understand that the landowner himself has stated he consistently achieves yields of 10 tons per Ha or more. The 2023 average yield in the SW was 8.1 tons per Ha, clearly demonstrating PPF as a better than average producer of wheat.

Grass Production

- a. Figures for yields on PPF for last year show 42 acres produced 360 x 4ft round bales at approximately 500kg each, giving a yield of 8.57 bales per acre or 4.285 tons per acre. This is without the use of fertiliser.
- b. The average for Wiltshire is 8 to 10 bales per acre – with fertiliser.
- c. One would expect there to be as much as 20% improvement with fertiliser, so the yields here are again well above average.

3.4.2 Drainage

- a. In the 1980's an intensive pattern of drains was installed between 400cm and 1m below the surface of the Site. The existing drainage structure will therefore be destroyed by the driving in of the 1.2m piles to support the solar panels.
- b. The applicant proposes to mole under hedges, trees etc to avoid damage to them. This will involve excavation of large pits to allow the mole to be driven through. The field drain system has its mains running parallel with all the hedge lines, exactly where they will excavate to mole. If these drains are severed and not repaired, it will render the whole land drainage system useless.
- c. This will reduce the field's ability to shift water, contributing to flooding issues.

3.4.3 Compaction

- a. The land under the proposed Site consists mainly of gault clay. It is very susceptible to compaction, to which end farmers should make it their business to avoid this by subsoiling, avoiding excess vehicle movements and avoiding working on it in wet weather.
- b. Both the construction and decommissioning processes will lead to massive compaction as building contractors will do none of the above. This will have the effect of causing huge amounts of run off and prevent the soil from returning to productive farming for years, as compacted clay is in effect a

pond lining. Also, unless the land drains are replaced, it will never drain properly again.

- c. "Having worked the farm I am aware that the highly fertile top soil is not hugely deep, mixing this with the subsoil and moving this around will reduce its fertility for decades."

3.4.4 Railway

- a. Parts of the railway are built on a historic gault clay landslip. The railway and sloping sections of farmland adjacent to it are constantly shifting and considerable effort has been expended by the railway companies to stabilise the soil along approximately 60% of the length of the solar farm.
- b. Network Rail have mostly achieved stabilisation, apart from a section to the east of Forest Farm that is under constant monitoring and is always in need of repair and relocating of the line.
- c. The change in water runoff, piling into the land slip could lead to an adverse effect on this section of railway.

3.5 Core Policy 67 – Flooding

The streams that flow to the north of the farm collect all water from the valley. Recent years have shown how delicate the balance is between run-off from the fields and the ability for the main stream to feed effectively into the Avon. The valley regularly floods as do the agricultural fields that surround it. The increased velocity of run off from thousands of solar panels will inevitably distort this natural balance.

This, together with the **damage caused in construction to the subterranean drains described above, will have a detrimental effect on the waterflow in the valley**. The gault clay will also compact during the construction process, again increasing flooding risk. Academic studies predict that run off can be up to 10 times as fast from solar panels which will erode the soil, silt up the valley and likely cause increased flooding. This has been totally dismissed in the proposal.

3.6 Core Policy 52 - Public Rights of Way

There are 5 PROWs around and through the Site. The 3 PROWs that actually go through the Site constitute a total of just over 2km of pathways - making it, we understand, the **single most impacted Site** for PROWs in the 13-year history of Wiltshire dealing with ground-mounted solar planning. These PROWs are there for the public to enjoy the countryside, simply by walking along them, not to be tunnelled through 10-foot-high security fences with no sight of the landscape just as a means of getting from A to B. This will have a major impact on the green infrastructure of the valley, crucial for relaxation and enjoyment of the rural landscape.

3.6.1 Open Inverter Noise

The applicant proposes to have open inverters spread across the Site instead of enclosing them in cabinets surrounded by solar panels, which tend to deflect sound. The components of these inverters (IGBTs) switching at high frequency (carrier frequency) produce a high-pitched noise (around 60dBA) which will travel in the prevailing wind direction, potentially affecting wildlife as well as walkers and horse riders. In fact, given the importance of these bridleways to the local horse-riding

community it is surprising that more information is not provided in the planning application to satisfy potential concerns.

3.6.2 Visual Impact

From the PROWs one can clearly see the NWDAONB at Etchilhampton, the Pewsey Downs to the northeast (including Stert village) and Salisbury Plain to the southwest. These views are from the length of the PROWs. Screening will not only ruin the view from the Site but will clearly impact the views back from those landmarks.

3.6.3 Glint and Glare

Flashes of glare from the railway and standing water are regularly seen particularly when viewing the Site from the North as one looks into the sun. The applicant has not done a full glint and glare survey, but **there will clearly be glint from the panels and stanchions affecting these views.**

3.7 Core Policy 58 - Archaeological Impact Objection We are not satisfied that the application sufficiently assures the LPA that the potential archaeology on the Site is understood and therefore managed appropriately. The County Archaeologist advised the applicant should supply a heritage statement with the results of a geophysical survey. **This has not been completed and therefore the application is not compliant with the County Archaeologists screening opinion advice.** It is our position that a trench evaluation is needed for the LPA to satisfy their obligations to fully understand the impact of the scheme on the Sites known and unknown archaeology when determining this application.

As described in the comments by West Lavington PC in respect to this application, this area has important historical links to the Bishop of Salisbury's hunting grounds, as evidenced by the ancient monument of The Moat very close to the site.

Section 4 – The grid and technical limitations of the proposal

This section is based on *A Summary of network aspects related to proposed Potterne Park Farm January 2023* provided by Ashley Wilson MSc, Ministry of Defence January 2023. Her applied PhD research is being implemented under the Defence Infrastructure (DIO) Future Energy Provision (FEP) Application. A key area of her research focusses on the transition to a secure, cheaper, and greener decentralised energy supply. (See her submitted document for the full analysis of the implications and short comings of the proposed design).

4.1 Wrong Location

This Application is purely a commercial venture, yet it claims to be in the national interest. It rides on an assumption that all solar is good solar. However, this is a poorly designed solution, in the wrong place which will add to the difficulties in an already constrained network and limit Wiltshire Council's flexibility to pursue more appropriate and modern renewables Applications. It's a bad idea all round.

4.2 UK Energy System

The wider context around the transition to a greener UK energy system needs to be understood when considering this application. Ofgem are committed to transforming the UK energy system to one coherent with the “4D principles; Decarbonised, Decentralised, Digitalised, Democratised” (*Ofgem 2019: Our strategic Narrative*). As such, support is moving away from Applications which focus solely on pay-back from expiring government subsidies for cheap renewable technology, to those fully compliant with these principles. **It is essential that LPA’s shift their decision-making criteria to back this strategy if it is to come about effectively.**

4.3 No Local Offtake

Although this proposal represents an opportunity to “decarbonise” some electrical supply (which it doesn’t do particularly well), the other three principles are not addressed. There is no consideration for localised offtake (decentralised supply) nor inclusion of assets which could support the local network by balancing supply and demand (digitalisation). The Application is purely a commercial venture, with no community or regional energy security element. As there is to be no reinforcement of the network in the Application scope, by consuming a large part of the remaining generation capacity in the NDO area, the proposal is likely to impact alternative generation options for county residents such as roof top panels thereby restricting customer choice (democratisation).

4.4 Limited Information on Site Design

For a full planning application **there is very limited or accurate information about the specific design of the solar farm.** This is unusual. None of the critical system design features are addressed in the DAS which focuses on the economic viability of the proposal instead – and these are broad metrics quoting other Sites, which are generally not alike, and are questionable in their accuracy – as shown in section 2 above. Specifically, information about the output of the system versus the size, as well as the types of panels to demonstrate optimum efficiencies has just not been provided. In addition, north-facing Sites are generally not preferred for solar implementations as they are subject to shading which not only affects panel effectiveness (including life cycle) but also output productivity and therefore system design. None of this is covered in the documentation.

4.5 Lack of Compliance

Also, the proposal does not mention any compliance with environmental, social and governance (ESG) standards for supply chain assurance on solar panels.

4.6 Impact on Alternatives - Roof-Top Solar

In July 2023 Wiltshire Council announced plans for the building of an additional 14,778 homes during the next 15 years, over and above their pre-existing Local Plan. Were all the additional 14,778 homes to have rooftop solar installed they would, in totality, exceed the generation capacity of PPFS by around 30%.

Importantly, because the generation capacity would be co-located with demand, the already constrained transmission system would not be as severely impacted. This is the kind of alternative that is possible yet would be frozen out if the proposal goes ahead.

4.7 Future Expansion

The proposed substation/connection point to the high voltage network would be a large construction Application and would create a very strategic and enduring asset, as mentioned in section 2 above. **The substation has the capacity to take on a further solar farm which may be the undeclared intention.** To leverage this, it is probable that an initial development phase would be followed by expansion plans (on the remaining 250 acres of Potterne Park Farm). In addition, significant electrical infrastructure would undoubtedly remain on land adjacent to the substation well beyond the already unusually long lease term.

Section 5 – The problems with Access/Highways are significant.

5.1 Inaccurate CTMP

We do not agree that the Construction Traffic Management Plan ('CTMP') is '*robust*', '*has been fully fact-checked*' or is '*extensive*' as stated by the Highways Department (Comment no WC-24-01-290889). In our view the CTMP **contains many exaggerations, inaccuracies and omissions.**

5.2 Site Visit Request

We have been urging the Highways Officer to undertake a visit to the Site because there is a very widespread view locally (including within our Council) that it is simply not possible to make any assessment of the road network (and particularly the private unclassified lane between Stroud Lane and the Site) and the safety issues unless the Officer visits and carries out a thorough inspection. The comments by the Highways Department (filed 16&17 Jan 24) were written without the benefit of a site visit, but we understand that one was finally made on 1 Feb 24. We would welcome an opportunity to provide local context and comment to this report.

5.3 Underestimated Traffic Volume

The CTMP claims (para 5.2.2) that there will be 245 deliveries (i.e. 490 round trips) and purports to justify that number by using data from a solar farm developed 10 years ago in Derbyshire which it misleadingly describes (para 5.3.1) as 'similar'. The logistics provided in the CTMP have been analysed by a Military Engineer of many years standing and involved in infrastructure projects worldwide; he estimates that there will be at least 3½ times as many deliveries (i.e. 863, being 1726 round trips) as claimed by the applicant. For example, failing to provide for any foundations for the substation reduces the in load of aggregate substantially. He also disputes the daily number of trips to be made, which have failed to take account of workers accessing the site as another omission. **It is clear that the applicant has significantly understated the volume of traffic.**

5.4 Area Traffic Impact

Dealing first with access via the classified road network (CTMP para 4.7), Option 1 via Devizes will encounter the slow traffic, narrow streets and numerous road works in Devizes and is nearly 1½ miles longer than the Option 2 route via Worton.

Option 2 involves taking a difficult right turn off the A361 at Bell Hill (just before Seend), a notorious accident hotspot as evidenced by the serious accident on 20/01/24 involving a bus and two cars requiring paramedics and police to attend. Once onto the C classification road through Worton with its parked cars either side of the road and a school, there is then an even more difficult left turn into the Worton Road (already signed as unsuitable for HGVs) which is a very narrow road into Potterne towards the A360. Turning right onto the A360 involves what is a very difficult right turn for a car but an almost impossible one for HGVs.

The Highways Officer is asking that the CTMP be withdrawn and resubmitted with Option 2 removed but **does not indicate how it can enforce the sole use of the longer and slower Option 1 route**, given that lorry drivers are as entitled as any other road user to use any route they think fit. **The use of either route by such a large number of HGVs will inevitably have an unacceptable impact on highway safety and the residual cumulative impacts would be severe over a wide area of the road network.**

5.5 Potterne Wick Traffic Impact

Route from the A360 at Potterne Wick to the Site: the first section along Stroud Lane has no footpath and even small vehicles have to pull in to allow passing - so there would be regular reversing by HGVs to accommodate on-coming traffic. There is a livery yard on this section and horses regularly have to cross the road.

After approx. 300 metres the road divides and access to the Site is to the right along a single-track (which doubles for its whole length as a footpath, POTT4) no-through road passing Wiltshire Scout Centre and the CampSite on the right and several allotments on the left. Cars are often parked outside the allotments as there is an extremely limited area inside. The footpath is connected by stiles to POTT16, POTT10, POTT15 and POTT7. The Scout Centre is used on a very regular basis for Speed Training Courses, many group meetings for associations around Wiltshire County and regular Scout activities. The CampSite is remarkably busy especially during the summer and can be booked for holidays with mobile homes and camper vans.

5.6 Private Road and Bridge Access

The lane continues along to a very narrow bridge immediately after a blind bend. Because of its age, structure and condition, and the fact that there is frequent flooding at that point, **there is no way this bridge is capable of sustaining any HGVs.**

As is clear from CTMP para 4.8.2, the applicant has not surveyed nor tested this bridge - a serious omission given the critical importance of gaining access to the Site - and assumes that any problems can be resolved with a temporary bridge: this is simply not the case, as the bridge is too narrow. The existing bridge would need to be dismantled or temporary abutments created; none of this has been addressed in the applications.

The applicant accepts (para 4.8.1) that vehicles are likely to overrun the edge of the carriageway but claims that can be mitigated through the use of 'ground protection mats': again, this is simply not the case because for at least 200 metres there are **no** grass verges at all and deep ditches run immediately next to the lane.

The photos below highlight the constricted access and lack of verge to widen the road for HGVs.



Strangely there is no mention of a large 650mm storm drain at the side of the lane just north of Potterne Park Cottage; this is uncovered and unfenced, and extremely dangerous. Given the narrow width of the whole of the lane it is not possible for even a small car, least of all an HGV, to pass a pedestrian who is on the PROW (and certainly not a child's pram, cycle or a wheelchair); there could be no question of any vehicle, and certainly not a HGV, reversing for any distance.

Stacking of vehicles to allow for a traffic control system to operate on the single-track lane is referred to for vehicles leaving the Site but where is the stack to be positioned for full load HGVs coming to the Site? The only realistic stacking site would be on the 60mph limit Stroud Lane which would not be wide enough for another vehicle to pass if a HGV was stopped there.

5.7 Breach of Duty

If this application is approved the highway authority will automatically breach its duty under s.130(1) Highways Act 1980 to '*assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority*'.

The applicant is seriously downplaying the dangers and the total impracticality of using this lane for access to the Site.

5.8 Other Owners' Rights of Way

The owners of The Gables and Potterne Park Farm Cottage (which abut the private lane) have 'Legal Covenants' dated 1975 to support their unrestricted right of way and to access pipework under the road and lines above along Potterne Park Lane (PPL), as and when necessary. It is also their only access for emergency services. They challenge the use of the road by heavy construction traffic, which would constitute an unlawful interference with their right of way.

Section 6 - Credibility of long-term operation and maintenance arrangements for the Site

6.1 Asset Cycles

At 50 years lease term, this is longer than similar Applications which are typically in the range 25-40 years. This will affect asset life cycles, increased maintenance and have an impact on access routes. These aspects are not mentioned in the planning documentation and there is no operation or maintenance schedule given for the Site.

6.2 Potential Consequences of SSEN Contract

Given the northly aspect of the Site and the fact that the plan excludes batteries, it is possible that the Application will fail to meet its contractual obligations to SSEN. This is difficult to assess since the applicant has not released any details on the connection contract with SSEN. If the operator fails to meet those contractual obligations, they may well resort to installing diesel generators to meet output requirements as is the case at the local Broughton Gifford solar farm. This would seriously undermine the “green” case.

6.3 Future Failings

In the event that the profitability of the Site is marginal, it is highly likely the Site will fall into disrepair. If the Site goes bust, then who is accountable for returning the Site to agriculture? Based on current accounts and the limited evidence provided, the applicant has no resources or funds to manage the consequences of a failed operation.

6.4 Stark Energy Company Structure

There are no details provided about the company structure being put in place to deliver and operate the solar farm. Potterne Solar Application Limited, which has no credible accounts with Companies house, is owned by Solar Group Holdings LLP and Arm Solar Holdings LLP, neither of which are obliged to file accounts with Companies House. Stark Energy Limited, who are co-ordinating this planning application are obviously connected in some way to Potterne Solar Application Limited. **We have to rely on the LPA satisfying itself that there is some legal entity that can be held accountable for any conditions that are put in place surrounding the application, and that these conditions can be enforced in practice.**

The company ownership model appears designed to limit financial risk and obligation, not to deliver and operate the Site. There are serious doubts about the technical viability of this Site (see section 4) and there appears to be no credible company structure in place to provide assurances that difficulties in operation will be fixed or obligations made to the authorities carried out. This view is reenforced when the ongoing role of Stark Energy is considered. From what we understand, **this organisation does not get involved in building and running Sites - it has sold 7 out of the 9 Applications which have gained planning approval to date.**

Based on the application documentation submitted, the future delivery and operation of the Site is a major concern. It appears, the applicant is doing the minimum, will only answer questions put to them by the planners and if the planners are not satisfied will take the case to appeal. Were planning approval to be granted, they will likely sell the Site. There is no long-term commitment.

Section 7 – Failures of due process

There are serious questions to be answered regarding due process and the submitted planning application documents, which are incomplete and misleading. To such an extent that the proposal should be dismissed on these points alone!

7.1 “Community Consultation”

It is felt that this whole process has been carried out in a manner designed to make it as difficult as possible for Consultees and members of the public alike to assess and comment on the application.

It is misleading to claim that there has been any meaningful consultation with the community: a very poorly-prepared presentation by Lighthouse took place at Potterne Village Hall (despite the Site actually being in Easterton Parish) on 28 November 2023 with just 5 days notice by email to parish councils with a short briefing note - this being the very first any of us knew about the proposed development; there had been minimal advertising of the event and most people learnt of it via social media.

Para 9.1.1 of the DAS states “*the developer intends to commence a period of pre-application consultation with the local community and that following this period of engagement an application would be submitted taking into account any feedback received*”; this is complete and utter nonsense, as the application had already been lodged the day before the meeting. Notwithstanding, one of our councillors was specifically told at the meeting that the applicant hoped to file the application before Christmas.

7.2 No Formal Notification to Neighbours

The *Statement of Community Involvement* (SCI) document and the *List of Neighbours Notified* are misleading. We are informed that **no residents listed in the application were contacted or formally notified** of this proposal prior to the planning application being lodged.

As mentioned, residents found out via social media that a proposal for PPF was in motion and that a community engagement meeting was to be held on 28th November. The meeting was well attended, and the general mood was against the development. It was **not** a “positive experience” as stated in 4.1.4 of the SCI document. People were asked to raise their comments online or on paper in the meeting. We were told that we had till the end of December to put comments in. However, the *Statement of Community Involvement* uploaded on 5th December contains **none of the online comments** made by residents. We know that the vast majority of those comments were vehemently against the proposal.

7.3 Lack of Transparency

We do not believe there was ever any intention to engage with the community, and the whole exercise was a charade and a tick-box exercise for the LPA. Para 9.1.3 DAS is also completely untrue; the ‘team’ were not invited to, and did not attend, any parish council meeting. Lack of space prevents us itemising every false statement in

para 9 DAS and the SCI, but we suspect this careless attitude to the truth may be deliberate.

7.4 Errors

The planning documents frequently contain basic errors. For example, in the SCI the address is given as Buckinghamshire and in another document there's reference to Buckingham Council; there's reference in the DAS para 4.3 to battery storage units where there's no application made for them nor solution proposed; the application is for a period of 50 years, yet reference in DAS para 3.4.1 to 40 years; the construction phase would be 56 weeks according to DAS para 4.5.4 but only 6-9 months in LVIA para 3.1.6; the Site is an area of 37 hectares in SCI para 1.1.3 but in the application (and elsewhere) 80 hectares. This lack of attention to detail is worrying, and clearly the documents have been hastily put together, with a lot of cut-and-paste from other Applications. We suggest the LPA should view all 'facts' with suspicion.

7.5 Data Inaccuracies

There are many examples which suggest the applicant is exaggerating the benefits of this proposed development (see section 2 above), and very much downplaying the effect it will inevitably have on our community and landscape. For example, (and in addition to the examples given at Sect 2 above) there is a huge discrepancy between the number of HGV movements claimed in CTMP para 5.2 and those assessed by our expert (see section 5.3 above). Whether deliberate or just the result of incompetence, these inaccuracies cast doubt on the accuracy of the applicant's other claims and are at best misleading.

7.6 Document Omissions

A number of important issues have been left out or postponed to a later date, but which are highly relevant to the proposed development and could seriously affect it. Examples: key study of the ecology, soil survey of the Site, survey of the bridge on the private road leading to the Site - to name a few. Worryingly, there is no detailed glint and glare assessment, which is vital for residents who overlook the Site, and members of the public who walk, cycle and horse ride on the PROW's. There is also a military aspect here - helicopters regularly use the area for training and there is no mention of the MOD, amongst other stakeholders, being consulted. We believe these omissions have been deliberate to give the applicant wriggle-room to amend the application at a later date.

It is clear from the above that the applicant intends to bulldoze this application through and to catch the local community off guard: there was no meaningful public consultation, the voluminous documentation has been carelessly put together and contains a number of serious omissions. In our view, the application should be considered void for these reasons.

Section 8 - The proposed development is not in the NDP.

This is not a rejection of the need for renewables or solar - it is a rejection of this particular Site. The people in this part of Wiltshire have more than demonstrated their support for solar investment. There are 6 solar farms within a 5-mile radius of Potterne and given the proximity of the NWDAONB this is quite a concentration and demonstrates a serious commitment. Wiltshire is more than doing its bit on solar. This is a designated area for agriculture not development.

8.1 Area Priorities

The priority for this area is agriculture and the protection of a Special Landscape Area, and we would support that categorisation for this valley to prevent future industrialisation of this tranquil rural landscape. Tourism is an important plank in our growth strategy going forward for the Devizes area and **this valley is one of our best assets**. Our priority for this valley is not development and not solar. We have been quite clear in our NDP that specific areas are not for development and this valley is one of them.

8.1.1 Extracts from the Potterne Neighbourhood Development Plan ('NDP')

1. The NDP is a serious, objective strategic development plan that took nearly five years to complete; at every stage of its development, it involved detailed and protracted research by its steering group and close involvement with our community. It takes into account all the constraints as well as our actual housing needs - matters that, living here, we know best; and we believe it remains just as relevant, realistic and practical now as in 2016, when it was made.
2. *"The Plan should maintain the distinctive character of the village by ensuring that there remain green corridors between the settlement boundaries of Potterne, Devizes and other nearby villages. **The Plan also seeks to ensure that there is protection to specific views in and out of the village.**"* ("Vision and Objectives of the Plan" (NDP para 2.1.1.1).
3. *"Sites on the edge of the village outside the settlement boundary shown in the Wiltshire Core Strategy Policies Map have **been carefully chosen to avoid any land of high potential ecological value** - the majority are on land presently used for arable agriculture." ("Site Allocations - Preamble" (NDP para 3.1.5).*