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Trowbridge
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Easterton Parish Council
% 12 Chandlers Close
All Cannings
Devizes
SN10 3PH

12th February 2024

Dear Mr James

Response to PL/2023/10332 Land South of Potterne Park Farm, nr Potterne, Devizes, Wilts, SN10 5QT

EASTERTON PARISH COUNCIL STRONGLY OBJECT TO THIS APPLICATION AND REQUEST THAT WILTSHIRE COUNTY COUNCIL REFUSE THE APPLICATION.

This is an 80 Hectare (200 acre) solar farm on a North facing slope, on productive farmland in a unique land locked natural beautiful landscape. The equivalent of 136 football pitches and larger than Potterne village. Yet the 'The criteria set out by HM Government' '*states that north facing sites should not be approved along with building on land of Grade 3b and above and BMV productive farmland*.

This is industrialisation on a massive scale on an historic, tranquil and wildlife values landscape, making it a brown field site for 50 years with little chance of returning it back to productive agricultural land. No amount of screening will ever hide this massive solar project, it will negatively impact the unique and special character of the valley and the local communities.

Following extensive consultation by Easterton Parish Council, including an extraordinary Parish Council Meeting attended by many parishioners, we submit this objection to application PL/2023/10332. Easterton Parish Council (EPC) has relied on subject matter experts in the course of compiling our objection.

Wiltshire County Council have a High Ambition Pathway to facilitate 590MW of solar capacity by 2030. At the time of writing, WCC has facilitated a potential 821MW via 43 operational sites and 11 schemes with planning approval: 39% over-achieving the Council's own highly ambitious target. Clearly WCC have played a leading role towards moving the County by supporting the UK in achieving net zero. We would urge the Council to consider the energy efficiency and connectivity report given by Ash Wilson's (Post Graduate Researcher in Public Sector Renewables Energy) 5 Key Points (page 2) and technical analysis (page 18) of the proposal in our objection submission.

A considerable proportion of this proposed 80 hectares of solar site area lies within our Easterton Parish, a point that was initially overlooked by the Applicant (Potterne Solar Project Limited). They had assumed that it lay in the Potterne Parish Boundary. The only Public Consultation was in Potterne and that was the day after the submission of the planning application. Easterton PC were not formally consulted until late January. After the Potterne consultation, Easterton PC in order to catch up with the process conducted informal consultation across the parish. This included an extraordinary Parish Council Meeting and a further Parish Council Meeting.

As a Parish Council, we have read and discussed the supporting documentation and examined the factors that should be considered when determining this application for a permanent large scale electrical installation. In addition we sought input and advice from local parishioners. We believe there is sufficient evidence that **this application is not in accordance with National and Local Planning Policy, and Wiltshire Strategic Objectives therefore should be refused**. The evidence to justify this statement is considered below and on the following pages.

With kind regards

Easterton Parish Council

EPC's objection to application PL/2023/10332 rests on the Applicant's failure to satisfy the provisions of the following Core Policies, Planning Principles and Legal Statutes which we detail in our submission and list below:

- Core Policies, 42, 50, 51, 52, 57, 58, 59, 60, 62,
- Failure to answer PL-2023-10198 WCC Screening Response
- The National Planning Policy Framework, NPPF para 118, Par 174.
- Impacts on PROW s and Amenities
- Natural Environment and Rural Communities Act 2006
- Wildlife and Countryside Act 1981
- Conservation of Species and Habitats Regulation 2017

1) <u>THE NEED AND SUITABILITY</u>

Our initial point to raise is the success of **Wiltshire Councils' Climate Strategy Delivery Plan.** This highlighted a 'High Ambition Pathway' to facilitate 590MW of solar capacity by 2030. The fact that Wiltshire Council have not only met but exceeded this ambitious target is applaudable. It is a measure of the ability of Wiltshire Council to deliver ambitious delivery targets, when it has been shown that a total of 821MW should be either operational or with planning permission in Wiltshire by 2030. (*Summary of network aspects related to proposed Potterne Park Solar Farm, written by Ash Wilson*).

Therefore Wiltshire Council have exceeded it's most ambitious target by 39%, with 43 operational solar farms and a further 11 with planning permission. We ask the Council to carefully consider whether the Potterne Park Farm proposal meets all of the National and Local Policy requirements, as we do not believe the Council should be pressured to accept applications that are in unsuitable locations.

- **Residents are generally supportive and understand the importance of green energy but this proposed north facing Potterne Solar site is too large and totally out of character with this landscape. The impact on this area and amenity value of the unique countryside for residents, communities and visitors is too great.**

We urge the Council to consider the 5 key points below raised by Ash Wilson, (Post Graduate Researcher in Public Sector Renewable Energy.)

(refer. technical information).

1) Potterne Park Farm Solar proposal is hugely advantaged by a legacy low-cost connection offer, along with other government incentives. **This artificially inflates private investor returns in what is a simplistic and inefficient solar farm design which would not be encouraged under current energy policy and does not best serve the local or national interests.**

2) Wiltshire solar targets have already been met and substantially exceeded, and the local distribution network will be fully constrained for the foreseeable future. Ofgem acknowledge that there are "important alternatives to building extra network capacity". Prioritisation should now go to renewable projects which enhance existing solar capability such as storage, or improve the existing electrical infrastructure, in line with the transmission and distribution network strategy for the area.

3) Many of the intended 'green energy benefits' seem inflated, wrong or misleading. Some of the site characteristics (north facing slope, near elevated woodland) are likely to impact the inherent generation efficiency of the proposal. The level of CO2 savings associated with the project are both unsubstantiated and too high. The proposals give no detail about the carbon footprint of the development. The assertion that PPFS generation would power 15,000 homes is not correct.

4) The proposed substation/connection point to the high voltage network would be a large construction project, and would create a very strategic and enduring asset. To leverage this it is probable that an initial development phase would be followed by expansion plans (on the remaining 200 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.

5) The District Network Operator is obliged to honour the legacy connection agreement. However, it is the responsibility of the Local Planning Authority to fully understand the long-term implications of siting this development in Potterne Vale and the potential impact this particular project would have on other Wiltshire Council priorities in support of local energy security (such as housing with integrated solar and smaller scale local initiatives).

Furthermore, this Parish Council does not believe that there is a sound business case for a project of this size in such a remote location. We urge Wiltshire Council to consider the medium to longer term viability of the proposal. The risks and costs of developing such a large electricity generating solar installation on what is an unsuitable North facing site (to provide an intermittent and problematic energy supply) due to the severe shading caused by the wooded escarpments and trees on the south side of the site. This impact of shading occurring especially in winter **MUST** be balanced against the environmental impact, including the irreversible destruction and fragmentation of valuable wildlife habitats and major visual impact.

2) THE PLANNING OBJECTION

The Principle of the Development

The National Planning Policy Framework (NPPF) requires *decisions to be made in accordance with the development plan, unless material considerations indicate otherwise (Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004). It requires any conflict identified with development plan policy to be attributed the appropriate weight in consideration of the planning balance.*

The public, in this case are being asked to accept renewables investments (based on misleading and inaccurate evidence from the developers Assessment statements) above the Wiltshire Strategic principles of protecting a unique landscape and environment.

CORE POLICY 51 AND 59 SHOULD BE CONSIDERED ALONGSIDE THIS POLICY ;
The size, location and design of renewable energy schemes should be informed by a landscape character assessment, alongside other key environmental issues as set out in Core Policy 42

THIS APPLICATION HAS FAILED CORE POLICY 51 AND CORE POLICY 59.

Core Policy 42 in the Wiltshire Core Strategy (WCS) supports the development of 'standalone renewable energy installations', subject to the identified criteria. Accordingly, the Potterne Park Farm proposal will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account:

i. The landscape, particularly in and around AONBs

iv. Biodiversity

v. The historic environment … and its setting

vi. Use of the local transport network

vii. Residential amenities, including noise, odour, visual amenity and safety

viii. Best and most versatile agricultural land

In accordance **the NPPF, Core Policy 42** also states that Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context**.** The EPC respectfully ask the Wiltshire Council to give some consideration to the fact that there are already **6 permitted or proposed solar farm sites within a 5 mile radius of the proposed large scale one at Potterne Park Farm**. There are already 43 operating solar farms and 11 approved awaiting construction. Hence the overall cumulative effect of the number of solar should be justified.

We will demonstrate by the following supporting information; the proposal will have significant impacts on Core Policy 42 i), iv), v), vi), vii) and potentially viii).

3) LANDSCAPE AND VISUAL IMPACT

Strategic Objective 1.19 of the Wiltshire Core Strategy states *"A strategy which will ensure that the most is made of Wiltshire's outstanding environments…. 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".*

Core Policy 57 *'Ensuring High Quality Design and Place Shaping' Wiltshire Core Strategy lays down the requirement for good design.*

Core Policy 51 *States that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character.*

THIS APPLICATION FAILS ON BOTH OF THE ABOVE CORE POLICIES 51 & 57 IT WILL HAVE A MAJOR IMPACT ON THE ENVIRONMENTAL ASSETS AND WILL ERODE THE VERY QUALITIES OF WILTSHIRE LANDSCAPE. THE SOLAR PROJECT DOES NOT ENHANCE THE LANDSCAPE CHARACTER BY ANY MEANS.

THIS APPLICATION SHOULD HAVE CONDUCTED A FULL LVIA NOT JUST AN LVA

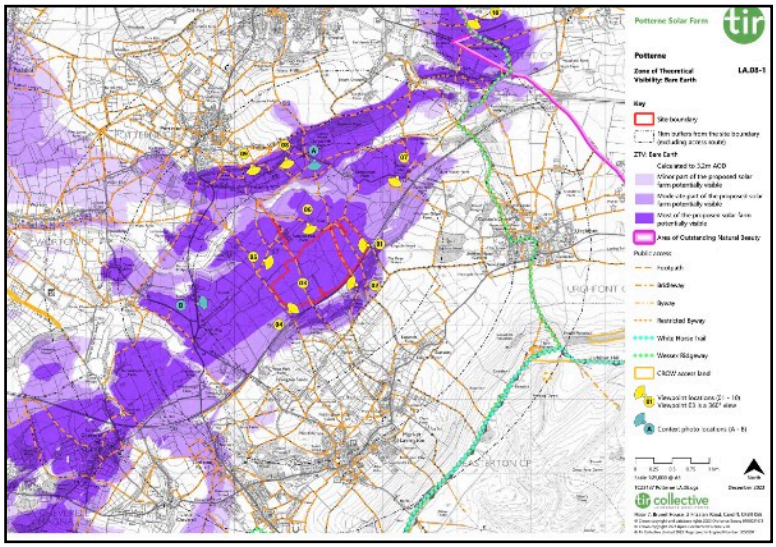
- The application is accompanied by a Landscape Visual Assessment (LVA) , where the applicants have failed to demonstrate the true visual impact by showing photomontages of proposed solar arrays and a full analysis of all impacts caused by such.
- It fails to address the full extent of the potential impacts from the proposed very large-scale electrical installation in an area of open countryside with predominantly agricultural uses.

- It fails to demonstrate that there will be major visual impact for most of the residences and all receptors from either side of the valley as they are situated overlooking the whole site. Hence screening by hedges and fencing will not be effective all through the year.
- It fails to reference the Wiltshire Council Renewable Energy Study (March 2023). According to this guideline, the site falls on the boundary of Landscape Sensitivity Areas 1 and 2 for very large scale (50-120ha) solar energy development. This is important context that the LVA omits to use. **According to the Wiltshire Renewable energy study this site should start as highly sensitive.** This report does however state that development proposals that last more than 40 years should be considered permanent; therefore this Potterne Solar proposal will lead to the permanent industrialisation of a large area of open farmland.
- **This application is reliant upon constant references to temporary of 50 years and as being fully reversible and as such undermines the entire LVA according to Guidelines for Landscape and Visual Impact Assessment 3rd Edition:** *The Landscape Institute and Institute of Environmental Management & Assessment: April 2013*

The Landscape and Visual Assessment (LVA) provides very few viewpoints that actually represent the significant negative impacts to local residents, and all users of the public rights of way (on foot and on horseback), in addition the failure to acknowledge or assess the impact from the Wessex Way to the South west of the site. The LVA does identify that there will be moderate adverse impacts to the Etchilhampton Hill in the AONB, although we question that the proposal will be a medium-small change.

- It is not possible to assess the landscape and visual impacts without the use of photomontages, which were **specifically requested by Wiltshire Council's Screening Response (PL-2023-10198).** We believe that the proposal is not only permanent but also irreversible, due to the built development (substation) and damage that the installation by pile driving supports into the ground, cable trenches, is likely to cause damage and change to the hydrology of the area. Notwithstanding the fact that the Applicant could provide additional information and a full Landscape Visual Impact Assessment, it is our opinion that this large scale electrical installation will have significant, detrimental landscape and visual impacts.

The proposed solar site will not protect, conserve and where possible enhance landscape character.



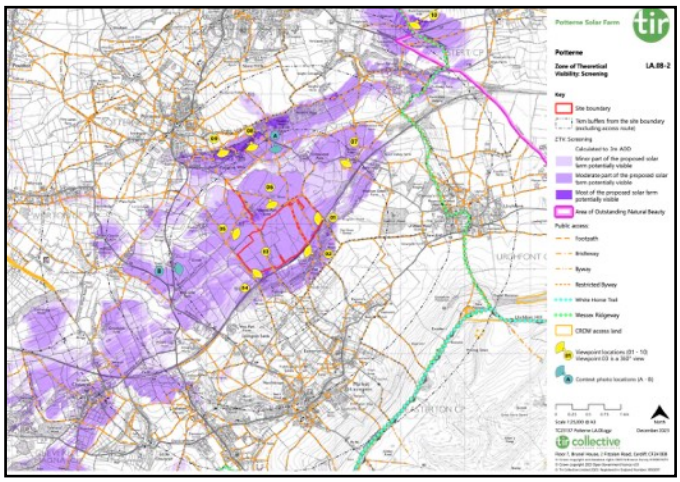
The map on left shows the extent of visibility from the:

TIR LVA Zone of Theoretical Visibility: bare earth.

This shows that the whole of the solar site is in the dark purple area which is recognised in the key: **'Most of the proposed solar farm is potentially visible.**

This is more than 'potentially', the entire site IS VISIBLE for all the receptors on all sides of the valley.

This is nonsense as this screening will be ineffectual especially in winter with bare trees and hedgerows and because the receptors/impacted residences are situated on either side of the valley are looking down on the solar farm.



The image on left is taken from the applicant's:

TIR LVA and shows the Zone of theoretical visibility screening:

The mid purple colour is termed **"moderate part of the proposed solar farm potentially visible'**

This is more than moderate when it is still VISIBLE for all the receptors on all sides of the valley

Please note that Forest Farm and West Wood, Folly Wood are marked as moderate visibility on this map when in fact they are visually impacted significantly and fully.

Furthermore, the substation, artificial lighting and CCTV cameras on high poles around the development would be seriously inharmonious and intrusive in this rural landscape. It is in effect a permanent and incongruent industrial installation on highly visible farmland that is bisected by numerous public rights of way. We believe that there will be **significant major adverse impacts** on landscape and visual effects as a direct result of this proposal.

Please note: The Applicant has not shown any detailed plans and placements of lighting and CCTV cameras around the substation area nor around the site. This would be critical for both the wildlife and for the residents privacy.

- **This site is highly visible for visitors, walkers and residents living and overlooking from both sides of the valley - as immediate receptors get the full visual impact of this proposed site, most of the residents on both sides of the valley are looking down on the proposed site, this is worse in the winter. It is unacceptable and detrimental to the visual outlook and potential property value.**

4) ECOLOGICAL AND BIODIVERSITY IMPACT

Core Policy 42iv Biodiversity

OBJECTION TO THE PLANNING APPLICATION ON THESE GROUNDS:

The Government Department DEFRA MAGIC mapping systems show this area as rich in supporting the priority species and habitats being bordered by Ancient woodlands of designated importance on both sides of the valley supporting a rich and diverse wildlife of rarity and importance.

By siting a large scale solar farm such as this covering such a large area of the landscape, creates major obstructions of wildlife corridors and destroys rich foraging areas for all wildlife. This will be exacerbated by the stock proof fencing either side of the PROWs and around all the different solar fields.

The NPPF and Core Policy 50: *state that the local planning authority must have sufficient information to judge whether the proposal would be likely to result in any adverse impact to protected habitats or species. ..to retaining the valuable natural environment including priority species and habitats*

This information has not been supplied by the Applicant. The Ecological Impact Assessment by GE Consulting (Report Reference 1912-EcIA-VB) has major omissions and does not accurately measure the potential impacts on the ecology of any scale of solar farm on this site.

Core Policy 50: *seeks to ensure protection and enhancement of these sites and features, and is necessary to help halt and reverse current negative trends and meet new challenges particularly from climate change adaptation and pressures associated with the increasing population.*

***CP 50* 6.72 Wiltshire's natural environment is one of its greatest assets and includes a network of identified wildlife sites:**

The valuable natural environment includes not only identified sites, but also other features of nature conservation value including:
• priority species and habitats (including those listed in the national and Wiltshire Biodiversity Action Plan)
• areas of habitat with restoration potential (particularly those identified on the South West Nature Map or through other landscape scale projects)
• all waterbodies covered under the Water Framework Directive
• features providing an ecological function for wildlife such as foraging, resting and breeding places, particularly wildlife corridors of all scales which provide ecological connectivity allowing species to move through the landscape and support ecosystem functions.

***CP 50 6.73* Collectively these sites and natural features make up the local ecological networks necessary to underpin and maintain a healthy natural environment.**

5) BIODIVERSITY AND ENVIRONMENT

THIS APPLICATION SHOULD BE REFUSED ON THE BASE OF FAILURE TO COMPLY WITH CORE POLICY 42iv - Biodiversity AND CORE POLICY 50 Landscape Environment

- The survey area omits areas that may be of ecological interest, both within the site and on the boundaries. The survey data is not detailed enough, as it is only a Preliminary Ecological Appraisal. The walkover survey with minor additional survey evidence (e.g. Great Crested Newts) is not sufficient to assess the full impact of this very large electrical installation on agricultural land.
- The submitted ecological reports in the application are superficial with poor recordings of bats and mammals. The survey data does not assess flight paths or foraging habitats let alone possible roosts within the site or on the boundaries.
- The report fails to understand that this is an important wildlife corridor, and the ecology survey demonstrates a lack of understanding of how the wildlife utilises the surrounding area for roosting, breeding, commuting and foraging.
- Potterne Park Farm has a crucial and important relationship to the whole Valley environment and ecology, linking the Pewsey Vale AONB 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.
- Areas that are of high ecological value have just been left out of the survey altogether – eg the woodland immediately to the north of the site.
- The developer 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.

5a) ECOLOGICAL IMPACT ON BATS SPECIES :

This application will cause significant negative impact on the number of wildlife species inhabiting this valley listed below, which are legally protected and of high conservation concern

BAT SURVEYS ARE REQUIRED FOR ANY DEVELOPMENT

The **Wiltshire Council Bat SAC Guidelines (2015)** set out general requirements for bat surveys in association with the development and these should be referred to. A series of additional survey requirements that must be adhered to within the area covered by this strategy: therefore the developers need to carry out a better scope assessment. A substantial suite of surveys may take up to 12 months to complete with a minimum 50 hours on site.

The GE Ecological Assessments does not state if it achieved the minimum of 50 days over a 12 month period required to conduct a fuller assessment of the ecology of the site. Bat surveys should have been carried out over winter, spring and summer periods to fully assess the wildlife bats in particular. *(Wilts Council Bat SAC (2015)*

The following project on the bats in this area is an important baseline for this valley and Potterne Park Farm.

5b*)* **<u>THE DEVIZES AND STERT VALLEY BECHSTEINS AND BARBASTELLE PROJECT.</u>**

18 species of bat in UK , 15 species in Wiltshire and 12 of which are here in this valley breeding and roosting these include 4 of which are rare. Annex II of the EU Habitats Directive.
The species listed are given higher conservation concern listed on Annex II (red listed) rare protected bat species roosting, breeding and foraging all across the area. *(Wiltshire and Swindon Biological Records Centre)*

- **Bechsteins Bat breeding population** evidence along greensand ridge, the ancient woodlands on both sides of the valley and as well as Potterne and Devizes. The Bechsteins bat use cavities such as Woodpecker holes within woodlands and have been recorded in hedgerows. **The developers assessment has not carried out an in-depth survey to establish this in the landscape of Potterne Park farm.** The loss of the corridors and landscape for commuting and foraging and roosting will have a negative long term impact on the health of the colony.
- **Barbastelles - exceptionally rare bat -** maternity roosts identified and used in the ancient woodland of West Wood, (located 75/100m from proposed solar farm, south and adjacent to the site). The disturbance or degradation caused by both construction and the solar panel arrays will have a negative long term on the health of the colonies.
- **These rare bats forage** and commute over a very wide area including across Potterne Park Farm. Radio tracking evidence available. (*Wiltshire and Swindon Biological Records Office*)
- **These bats are light averse so any artificial light human activity at night and daytime will have big negative impact on the health of the colonies.**
- **The Barbastelles require a rich well connected landscape because they move their juveniles and colony around the landscape.**
- **Greater Horseshoe bats.** These are the rarest in Europe. Restricted to SW and S Wales in UK They require a diverse habitat of mature semi-natural Woodland, open grasslands - including meadows, scrub, well developed hedgerows or lines of trees and watercourses. The cattle grazed pastures are important to this species - since there dung supports the dung beetle the mainstay invertebrate for Greater Horseshoe bats. This site, if under solar arrays, contrary to the applicants statements, will not be grazed by either cattle or sheep, (no solar farm has been identified around here to support sheep grazing for safety and welfare reasons.)
- **Lesser horseshoe bat**. These are the rarest in Europe. Restricted to SW and S Wales in UK
- **Both the above rare bats are found in woodlands close to West Wood , Forest Farm and West Park Farm**. Their day roosts have been located in Urchfont area and they forage along the woodland margins and access the wider landscape.
- Other common and widespread species in this Potterne valley include **Pipestrelles, Natterers bat, Whiskered Bat, Brandts Bat, Brown Long Eared Bat, Noctule and Serotin Bat.**

THE ABOVE STUDY SHOWS THAT THIS AREA AND FARMLAND IS HIGH HABITAT QUALITY AND FOOD SOURCES, THIS AVAILABILITY MEANS THEY DON'T HAVE TO TRAVEL TOO FAR IN ORDER TO MAINTAIN HEALTHY COLONIES.

<u>THE TROWBRIDGE BATS MITIGATION STRATEGY</u> - prepared by Johns Associates Ltd **for Wiltshire Council.**

PLEASE NOTE: THIS STRATEGY AND SURVEYS SHOULD BE CONSIDERED IN RELATION TO THE POTTERNE SITE

This strategy highlighted the following: Habitat Degradation of the land due to development will have a major impact on species of bats caused by the following:

.. degradation/demolition/removal of potential roost features including changes to environmental conditions…'Loss, damage or change of management of potential foraging/modification of habitats in a potential commuting corridor.

*' **the landscape surrounding all significant roost sites is critical** to maintain the populations of all bats. '*
' semi-natural habitats such as woodlands, mature hedgerows, watercourses and wetlands closest to roosts are important to bat populations particularly juveniles …
The Area was divided into Zones - Red and Yellow
*129. The Red Zone is located within 600m of woodlands or trees known to support maternity roosts for Bechstein's bat. New development of greenfield or residential brownfield sites within this zone is likely to result in high and unacceptable risks to bat populations, ..As such, **development of new sites within this zone is highly unlikely to be permitted,** and there should be no net increase in new residential curtilage **or light levels within the zone.***

*130. T**he yellow medium risk zone** represents the areas where habitat has been shown to be of importance, or is highly likely to be of importance, for Bechstein's, greater horseshoe and / or lesser horseshoe bat.*

*131. **The yellow medium risk zone,** it will be critical to ensure that adequate bat surveys have been undertaken to inform development in accordance with Section 6 of this Strategy. It will be expected that habitat features of importance for greater horseshoe, lesser horseshoe and Bechstein's bat, including roosts, foraging areas and commuting routes, are retained and enhanced in-situ ensuring full functionality:*

Hence the RED ZONE in this case of Potterne would be the ancient woodlands West Wood, Folly Wood and Parham wood, being 75m and 100m distance from the edge of the solar site, well inside the 600m

The YELLOW ZONE would be pertaining to rest of the site including woodland on both sides of the valley and the open farmland.

5c) SOLAR PV PANELS NEGATIVE IMPACT ON BATS

Bristol and European Universities researched bat activity on 19 ground mounted solar PV developments/solar farms in the South West.

RENEWABLE ENERGIES AND BIODIVERSITY : Impact of ground-mounted solar photovoltaic sites on bat activity.

Extracts below from the: THE JOURNAL OF APPLIED ECOLOGY HTTPS://DOI.ORG/10.1111/1365-2664.14474 TINSELLY.E., FROIDEVAUX, J.S.P., ZSEBÖK, S., SZABADI, K.L., JONES, G. (2023)

Para 3. *The activity of 6 of 8 species/ species groups analysed was negatively affected by solar PV panels, suggesting the loss and or fragmentation of foraging and commuting habitat is caused by ground mounted solar PV panels .*

Para 5. Policy Implications: *Ground mounted solar photovoltaic developments have a significant negative effect on bat activity, and should be considered inappropriate planning legislation and policy.*

Sect 4. Discussion - with several species there was lower activity in the fields of solar PV panels than in both open and boundary habitat compared to matched fields without solar PV panels. Specifically the solar PV sites had significant negative effect on 6 out of the eight species ..' in this research area.

'the significant reduced numbers of Serotins and Myotis along boundaries bordering PV sites .. potentially resulting in fragmentation of the ecological landscape."

'..reduced number of Pipistrelles and Nyctalus in the open habitats suggests that solar PV is resulting in habitat loss in both open and boundary habitats.'

HENCE SOLAR PHOTOVOLTAIC DEVELOPMENTS SHOULD BE SCREENED IN EIA'S (ENVIRONMENTAL IMPACT ASSESSMENTS) PARTICULARLY BECAUSE OF THE LARGE SCALE OF THIS SITE IN SUCH A SENSITIVE AREA.

The lack of EIA's being undertaken as a scoping process on undesignated ecologically sensitive areas is a BIG concern. (Gove et al 2016)

5d) BAT AND BIRD COLLISIONS WITH THE SOLAR PANELS

JOURNAL OF APPLIED ECOLOGY

2.35 and 2.36 Grief and Siemers (2010) *showed that bats attempted to drink from the panels and occasionally collided with them. If panels are more vertically aligned the bats often crashed into them when attempting to fly through them. More research is required for the long term effects of Solar PV sites.*

Swallows have been confused by the glass reflection the panels. **(see Glint and Glare assessments)**

5e) LIGHTING and WILDLIFE

The developers assessment do not give any details on artificial lighting when it is on and subsequent maintenance. **It is known that the introduction of lighting is a significant issue for the light sensitive species of wildlife.**

Lighting specifications and siting should not be left to the later design stages or be retrofitted into development proposals. It will be necessary to provide the baseline lighting survey and modelling information as set out.

5f) ECOLOGICAL IMPACTS ON WIDER PROTECTED SPECIES :

NATURAL ENVIRONMENT AND RURAL COMMUNITIES ACT 2006 (NERC) FOR THE DUTY OF PUBLIC AUTHORITIES TO CONSERVE BIODIVERSITY IN ENGLAND AND WALES.

This area is part of the Great Crested Newts Strategic Opportunity Area by DEFRA.(MAGIC Mapping) Great Crested Newt (GCN) - listed Schedule 5 of the Wildlife and Countryside Act 1981 and Schedule 2 The Conservation of Habitats and Species Regulations 2017.

The Developers ecological assessment stated they could only find evidence of eggs in one pond on Potterne Park Farm. When in fact there are more areas that support the GCN within the immediate area - 10 Great Crested Newts (male and female) were found hibernating in January 2024 on Potterne Park Farm neighbours property.

This needs a more in depth survey than employed in the report as GCN's are around in numbers across the farmland - this should not be ignored.

PROTECTED BIRDS AND MAMMALS WILL BE AFFECTED

- **Hobby - Listed Schedule 1 of the Wildlife and Countryside 1981 are considered rare** and found breeding each year in areas around West Wood. **They are more prone to nest disturbance.**
- **Spotted Flycatcher** breeding in West Wood, adjacent to Forest Farm **Red Listed Species that is in a dramatic decline and is of high species conservation concern.**
- **Corn Bunting** - Red listed Species list this needs the mosaic of hedgerows , arable fields, scrub and pastures.
- **Mistle Thrush** - Red listed
- **Linnet , Dunnock, Skylark, Kestrel** - amber listed,
- **Harrier, Buzzards and other Raptors** who hunt and nest in the valley and surroundings.
- **Swallows -** every year these birds nest and raise their broods in farm buildings in Forest Farm and forage across Potterne Farm. For them solar panels are confusing , simulating water surface in certain lights.
- **Stone Curlew** – the Potterne site falls within the buffer zone for the Stone Curlew Management Strategy of 6.4km from Salisbury Plain.

THERE IS EVIDENCE OF BIRD COLLISIONS WITH SOLAR PANELS (Journal of Applied Ecology)

BIRD DISPLACEMENT BY SOLAR PV PANELS

2.26 Montag et al (2016) *'found that Skylark tended to use undeveloped control plots more than solar farms. Montag et al (206) are of the view that ground nesting birds need an unbroken line of sight and would therefore avoid nesting on solar farms.'*

2.27 Default et al (2014) demonstrated that solar PV facilities could potentially alter the structure of bird communities and habitat. The pre-construction of Solar sites and facilities compared with post construction suggests there will be avoidance of the facility by raptors.

MAMMALS THAT WILL BE IMPACTED INCLUDE:

- **Brown hare - high conservation priority** - they need the mixed agriculture, crops and this major change could result in permanent loss of breeding habitat caused by the construction process.
- The young leverets will be vulnerable to the change in landscape and infrastructure/fencing mesh.
- **Hedgehogs** in decline
- **Dormice** (ancient woodland) in decline
- **Harvest mice** recorded in the fields on Potterne Park Farm
- **Deer**
- **Stoats**

THE WIDE AREA OF THIS SITE WOULD OBSTRUCT AND REDUCE THE NATURAL WILDLIFE CORRIDORS/ BREEDING AND FORAGING GROUNDS FOR PROTECTED AND NON PROTECTED SPECIES.

5g) SHORTFALLS IN PROPOSED MITIGATION

There are conflicts and shortfalls in the mitigation proposed by the applicants ecologists, the Design and Access Statement and the Landscape and Ecology Management Plan.

- An example of this is the management of hedgerows, where the ecologists suggest 3 year rotational management, to support biodiversity enhancement yet the other documents prescribe annual management to reduce shading in support of operational capacity. Clearly these 2 management activities are directly in contradiction.
- There are no detailed plans of the permanent internal access tracks/roads and gateways which might impact trees, hedgerows and ditches.
- Whilst the *developers* appraisal does loosely identify the presence of rare bat species, four automated detectors cannot fully ascertain the use of the whole area by commuting, roosting, breeding and/ or foraging bats.

- Detailed surveys for other protected species are also absent, including **badgers**, **Brown hare, hedgehog, harvest mice, Great Crested Newts and dormice**. Local knowledge can confirm that these protected species **are breeding and living** within the proposed development area. There needs to be further investigation to determine how the site links to other areas of nature conservation interest.
- There is a lack of recognition in their report that this is an area of **high ecological and significant value interdependent** with the ancient woodlands of Kingston Wood, Folly Wood, West Wood, Parham Wood and Potterne Wood. **These are all of high significant importance** to the health and continuum of the wildlife colonies identified.
- These ancient woodlands and the existing open farmland are of great inter-dependant importance that are vital for the conservation of these species of wildlife in this area and on a wider scale.
- Developers ecological survey data by GE on this area with recordings of bats and mammals does not assess flight paths, commuting corridors or foraging habitats and has not identified possible roosts within the site or on the boundaries.
- The report seems to lack understanding that this is an important wildlife corridor and habitat across the open farmland and boundaries.
- The report doesn't detail how they would clear the site of animals so as not to trap them inside the stock proof fencing separating the areas of arrays.
- The practice of grazing cattle is essential to the food chains and soil conditions of this site. Potterne Park farm grazes cattle across the farm on a rotational basis.
- Potterne Park Farm has a crucial and important relationship to the whole Valley environment and ecology joining the Pewsey Vale, Salisbury Plain AONB
- Lack of recognition of the ecosystems in the soil, when they are of great importance such as Mycelium, fungi etc. when the installation/construction process would alter this delicate system for a long time.
- The GE survey fails to recognise the importance of this site for farmland and ground nesting birds, as the **Bird Conservation Targeting Project (BCTP) suggests that the site has wider existing importance or the potential to be of wider importance, particularly for corn bunting and lapwing.**

6) <u>BIODIVERSITY NET GAIN</u>

Core Policy 50 *also requires all development to demonstrate no net loss of biodiversity and for major applications such as this the expectation is that development will deliver a net gain.*

The NPPF also encourages applications to deliver measurable net gains (para 175 d) and the government require development to deliver **10%** biodiversity net gain (BNG). **It is understood that Wiltshire Council will be looking towards a 20% BNG.** The Applicant has failed to supply comprehensive BNG figures. A more detailed ecological survey is required to determine the actual baseline biodiversity which will have been enhanced already through farming under the Countryside Higher Tier Stewardship Scheme (CHSS).

It is likely that the proposed development scheme will have detrimental effects on biodiversity, through altering the soil structure/ increased groundwater flooding/shading/EMF radiation/ trenching for cables/new tracks/vehicle compounds/the sub-station and noise.

Of particular concern is the inadequate assessment of the impacts on non-statutory designated sites within 2km of the Site. There are in fact Local Wildlife Sites (LWS) within 200m of the site and three within 75m.

Insufficient evidence has been supplied by the Applicant to allow the full impact of this proposal to be determined. Furthermore, it is our understanding that there will be significant adverse impacts, both on-site and in the wider area. **The proposed detrimental impacts on biodiversity should be given significant weight in the planning balance in accordance with CP50 and CP42.**

7) <u>THE HISTORIC ENVIRONMENT</u>

The Council has a statutory duty under sections 16(2), 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 '***to have special regard to the desirability of preserving listed buildings and conservation areas or their setting or any features of special architectural or historic interest which they possess.*** '

In accordance with **NPPF Paras 202 and 203** and **Wiltshire Core Strategy Policy 58**, ***the heritage impacts should be balanced against the public benefits of the work, with regard to the predicted scale of any harm.***

- It is considered that the potential impact on the setting of listed buildings, the Moat and Barrows around the site have not been fully assessed. **The impact on the setting of listed buildings beyond the 1km radius is also important.**
- Concerns are also raised at the potential for impact on archaeology across the site, specifically the lack of trial trenching requested by the Assistant County Archaeologist.

Wiltshire Council should insist on trenching and further archaeological investigations (Scoping Assessments) Concerns are raised when the applicants Archaeological assessments indicated that there are no recorded ancient woodland in or adjoining the site **- This is incorrect there are the ancient woodlands and fragments on both sides of the valley.**

7) <u>USE OF THE LOCAL TRANSPORT NETWORK AND ACCESS TO THE SOLAR PROJECT SITE</u>

Core Policy 60 *Sustainable Transport supports the premise for development within sustainable locations and this will be achieved through assessing and, where necessary, mitigating the impact of developments on transport users, local communities and the environment.*

Core Policy 61 *Transport and new development, amongst other criteria aims to ensure that the proposal is capable of being served by safe access to the highway network.*

Core Policy 62 ***clarifies that development provides appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.***

The NPPF states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

The proposals at Potterne Park Farm is supported by a Construction Traffic Management Plan (CTMP).

The first point to raise is this Management Plan has mislead LPA /Highways as it is based on a solar farm of 45 Hectares. That is almost half the size of the Potterne Wick site and below half of the potential electricity generation (20MW) which leads to a significant level of inaccuracy in their calculations.

This Applicants (CTMP) is also misleading on the actual dangers and impracticality of using this access route to the Site from the A360 through Potterne. This will have an impact on the Grade 1 listed houses and residents along the High Street. **We feel that this construction and ongoing maintenance of the site will have unacceptable and major safety impact on the highways along the A360, Potterne Wick, Stroud Lane.**

THE LEGAL USERS OF THE ROADS AND FOOTPATHS WILL BE SEVERELY IMPACTED AND BE ENDANGERED BY THE VEHICLES NEGOTIATING THE SAME OVER AN EXTENDED PERIOD DUE TO CONSTRUCTION PROGRESS.

THE CTMP SUGGESTED A 24 WEEK CONSTRUCTION PERIOD AS OPPOSED TO 56 WEEKS IN THE APPLICANT'S DESIGN AND ACCESS STATEMENT. We have calculated this to be 56 weeks and over depending on various factors.

- The Access Management plan is founded on a very poor comparative using another smaller site elsewhere in UK .
- Without clear peak traffic figures and the use of a potentially flawed comparable, it is not possible to conclude that an operational capacity statement is not required.

'The CTMP claims (para 5.2.2) that there will be 245 deliveries (ie 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 figures in the applicants CTMP report for vehicles needed to deliver goods to the site are not accurate - on the analysis by a Military Engineer involved in infrastructure projects worldwide **estimates that there will be at least 31⁄2 times as many deliveries (ie 863, being 1726 round trips) as claimed by the applicant. He also disputes the daily number of trips to be made.**

- **CTMP has made no plan for HGV's to have a stacking system in force** to regulate the number of vehicles entering or leaving at any one time the A360/Stroud Lane junction into Potterne Wick road.

The CTMP goes on to make further erroneous statements and calculations, particularly in regard to the number of traffic movements required to transport crushed stone for internal tracks, 2500 tonnes. This calculation does not include the stone for the compounds or any other fixed structure such as the sub-station.

IT IS CLEAR THAT THE APPLICANT HAS SIGNIFICANTLY UNDERSTATED THE VOLUME OF TRAFFIC AND HAS MISLEAD THE COUNCILS WITH INCORRECT INFORMATION.

8) ***UNSUITABLE DANGEROUS ACCESS FROM CLASSIFIED ROAD NETWORK (CTMP PAR 4.7)***

S.130(1) HIGHWAYS ACT 1980 ***'It is the duty of the highway authority to assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority including any roadside waste which forms part of it."***

- ***Option 1 All vehicles through Devizes centre onto A360 through Potterne village -*** *turn left into Potterne Wick road (Stroud Lane) at a dangerous blind corner (A360 both ways) into the narrow road. This is dangerous access for a car let alone large articulated turning right or left or exiting the same. This would apply to all small HGV's and smaller service vehicles.*
- *Vehicles exiting right onto A360 would be at even greater risk for oncoming vehicles. This is a* ***major safety risk*** *as there are frequent minor accidents and one serious has been recorded at this point. it will become more of an accident black spot.*
- ***Option 2.*** *Through Worton turning left out of the village onto a minor narrow road marked 'Unsuitable for HGV's' This route ends up into middle of Potterne where they would have to turn right onto A360. This again is not safe nor practical due to the nature and proximity of the listed buildings and parked cars plus the volume of other traffic using the A360.*

PLEASE NOTE: Any possibility of using the **Black Dog Crossroads onto the A360 should be vetoed as it** is **already an accident black spot** and would not be safe for any large and articulated vehicles pulling out to turn left onto A360 or exiting by turning right off A360. And then to turn right onto the Potterne Wick road from the A360 at the blind corner would be very dangerous. To turn left from the Potterne Wick/Stroud Lane onto the A360 would be just as dangerous. Both ways will be a major safety risk.

Potterne Wick : The section along Stroud lane road is narrow and has no footpath. Houses on either side make the road more narrow and difficult for two vehicles to pass without one reversing let alone a flow of HGV's and other construction vehicles. There is a livery stable/yard on this section of the Stroud Lane with horses regularly crossing and using the lane.

Either Option of access from the main Highways will have an unacceptable impact on not just the immediate area in Potterne Wick but also on the wider road network and how it functions with other road users, walkers and horses.

This Potterne Wick road is used by Potterne residents transporting children to Urchfont school on a daily basis and back.

- **The entrance from Stroud Lane to the Site is down the single shared access road (which doubles as footpath POTT4 for the whole length), crosses a small bridge and runs to the right along the public footpath: ML1c.**
- This shared access road to the Potterne Park Farm site is of such a narrow width that would not allow a car and pedestrian to pass safely let alone large HGV vehicles. A dustbin lorry takes up the whole width of the road.
- There is no passing room (ditches on either side) and no safe way to reverse an HGV let alone other vehicles to allow passing.
- There is no mention of where they would be held or stacked safely offsite - due to the large number of vehicle movements required for delivery etc. onto site. Any stacking would have an impact on places such as outside Devizes ?
- How would this work with lorries leaving the site safely and lorries entering safely.
- The applicants have not shown peak traffic generation figures, nor any assessment of sensitive receptors such as the Scout Hut, walkers and other vehicles. This is exacerbated by an indication that the further work required to assess the impact of the extremely heavy lorries on shared access/private

road crossing a small bridge **will not be undertaken until the permission is granted. We do not agree with this as the impact is too great on all legal users and residents.**

- The Scout Hall is at top of this lane and is often hosting groups of children - so this would be a major safety issue.

FRONTAGERS RIGHTS OF WAY - The owners of The Gables and Potterne Park Farm Cottage have 'Legal Covenants' 1975 to support their unrestricted right of way and to access pipework under the road and lines above along PPL, as and when necessary. It is their only access to emergency services. They challenge the use of the road by heavy construction traffic, which would constitute an unlawful interference with their right of way. (*see Private Roads -The Legal Framework (Andrew Barsby) Cases cited in GALE on Easements at Para. 13-06*)

THE APPLICANT IS SERIOUSLY DOWNPLAYING THE DANGERS AND THE TOTAL IMPRACTICALITY OF USING THIS LANE/FOOTPATH FOR ACCESS TO THE SITE.

EASTERTON PARISH COUNCIL SUPPORT THE VIEW THAT THE TRAFFIC ROUTES PROPOSED ARE WHOLLY INAPPROPRIATE, USING UNSUITABLE ROUTES THAT ARE POTENTIALLY UNSAFE FROM ALL DIRECTIONS.

9) PUBLIC RIGHTS OF WAY (PROWs)

There are potential major impacts on the following PROW's
Footpaths: ML1c, Pott4, East10, East 14, Bridleways: East12, Urch34 going into Urch45.

This solar project development will have major effects on all the PROWs so will have failed the National Planning Policy Framework and Wiltshire Core Strategy.

> **NPPF (para:100)** *planning policies should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.*

Despite the displays at the Stark Public Consultation (November 2023) suggesting there were no rights of way (PROW) across the site, it is a fact that the site is dissected by three PROW's (2 footpaths and 1 bridleway) and surrounded on all sides by well established footpaths and bridleways.

It is important to note that of the 43 operational solar sites and 11 currently approved sites in Wiltshire, there is a total of 4.3km of PRoWs that cross these sites. **This Potterne site alone has a further 2km**, **making the impacts the most significant for PROW's in the 13yr history of Wiltshire dealing with ground solar planning.**

> **FOR THE NEXT 50 YEARS THE IMPACT ON ALL THE LEGITIMATE USERS OF THE PROWS WILL BE MAJOR AND SIGNIFICANT ESPECIALLY DURING CONSTRUCTION, MAINTENANCE AND DECONSTRUCTION.**

(Please note: The applicant has planned the entrance route into the solar project along footpath ML1c. and POTT4, which will become a permanent road for vehicles.)

- All of the PRoWs are in regular use, not only from local residents/visitors/ornithologists/horseriders to the area. **The Landscape and Visual Appraisal (LVA) underestimates** the impact on these PRoWs on the legal users.
- These PROWs are essential for the wellbeing and mental health of many and used and enjoyed for the peace and tranquility of the landscape will be destroyed by at least 50 years of industrialisation.
- Walking through the public rights of way surrounded by high security fence and cameras through arrays of tall 3.2 solar panels will totally remove the appeal and view of the rural landscape.
- The LVA also fails to address any views from the Wessex Way to the south of the site (on Strawberry Hill for example) or the byway along the Easterton Sands ridge. The solar site can be seen by all who use these byways and PROWS
- this impacted landscape will be seen more in the winter when there are no leaves on the trees or hedges.
- No amount of screening will be ever sufficient to hide this solar project.
- There will be both a continual humming and/or high pitch noise from the inverters which will affect walkers and riders enjoyment of the right of way, let alone the residents on either side.
- The LVA does not even assess the full impacts for Bridleways East12 and URCH34/45 on horse riders, suggesting that users will only have 'moderate sensitivity' to what is categorised as a permanent development proposal. This for a horse is significant sensitivity.

It is questionable how the impacts can be assessed with no photomontages and photographs/viewpoints along some routes. The consultation statements use photographs from other sites on their layout plan and no relevant photomontages shown. These are 3.2m high solar arrays, which are in strings that will end/start adjacent to paths that bisect the site, with every path that adjoins the site also near the end/start of a string. **The users of ALL these PRoW's would have significant susceptibility and high sensitivity to the loss of the rural landscape replaced by a stark industrial site of glass and metal.**

We believe that changing the visual impact from open natural countryside to an large scale industrial mass has a major adverse impact.

10) THE BRITISH HORSE SOCIETY GUIDANCE ADVICE ON SOLAR FARMS

Routes used by equestrians' January 2023 is a fair and non-subjective document. It highlights that where solar farms are proposed, the potential impact on horses should be considered on any route used by them (including byways, bridleways, roads and permissive routes) which may be affected, and on equestrian businesses where horses are kept or trained. None of this guidance has been referred to or incorporated into the information supporting this application. Furthermore, this guidance is based around assessing the potential impacts on bridleways near solar farms, rather than ones that pass through the middle of an solar array area. **In this case of the Potterne Solar Site the Bridleway E12 which goes straight through the middle so the impact on the legal users will be greater with possibly a greater safety risk.**

- The high number of local equestrian businesses in this locality alone (Easterton and Market Lavington) include livery, training yards along with a significant number of private equestrian ownership. All are within easy access of this site and the potentially impacted rights of way. This solar farm with 3.2 m sloping high solar panels and the glare/reflection caused by them and 2m fencing (should be higher if by a bridleway for safety reasons) will have a big impact on horses and riders. This comes at a time when riders are trying to establish safe countryside routes away from vehicles and industrial areas and enjoy the unfettered countryside. It will be like riding through an industrial estate.
- The Urch 34 and 45 Bridleways are adjacent to the site and this will have a similar significant major impact for horse riders and walkers
- The inverters that convert solar energy into electricity, or storage systems make a low humming noise while they operate, which is considered noise pollution which has not been addressed. Horses are very susceptible to white noise and noise per se well before humans can hear and assess. It is concluded that there will be **major adverse impacts** to users of the right of way within, adjoining and overlooking the site to enjoy the more distant views of this valley.

EASTERTON PC BELIEVE THAT THERE WILL BE AN UNACCEPTABLE IMPACT ON HIGHWAY SAFETY AND THE RESIDUAL CUMULATIVE IMPACTS ON THE PROWS WOULD BE SEVERE.

- Until further evidence is submitted to support this large-scale proposal in a rural area, utilising narrow rural roads for access will have significant adverse impacts on the users of PROW's. This is not a sustainable location for this proposal.
- **We would also require confirmation that the Applicant does not intend to use any of the local PROW in a way that creates any obstruction during construction and operation. i.e. PROW Users must have the priority and unrestricted use at all times. .**

THIS PROPOSAL IS CONTRARY TO CORE POLICIES 60, 61 AND 62.

We also believe that the significant harm caused to users of the PRoW must be considered in the planning balance. We consider this is a major impact to all legal users of each PROW.

11) CORE POLICY 57 *aims to ensure that proposed development would not have a detrimental impact to the amenity of adjoining buildings and uses.*

As noted previously, **Core Policy 42 vii** states the *proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site specific constraints, including (vii.) "residential amenity, including noise, odour, visual amenity and safety".*

This Parish Council is responding to concerns about unacceptable impacts on the occupiers of adjoining and overlooking properties on both sides of the valley and users of the rights of way through.

For example, glare issues, unacceptable outlook over the area, loss of privacy, conflict with construction traffic and noise impact from the pile drivers putting in thousands of metal posts for 12 hours a day for 56 weeks.

- We are also aware that there hasn't been in depth assessments on Noise during construction, artificial lighting or CCTV placements. (Who controls the CCTV data and what is the impact on privacy for all PROW users?
- The valley has a distinct sense of tranquility, essential for mental wellbeing, which is enjoyed by local residents, visitors and riders/walkers who use the PRoWs. This proposed large scale industrial installation would be detrimental to the amenities to all who live or use this area.
- The solar panels at 3.2m would rise above the hedges and dominate the topography. It would present as a starkly industrial mass of metal and associated built infrastructure.
- The applicants have omitted batteries on the application form. We cannot see how this site could be viable without batteries; these would also contribute further to the industrialisation of the landscape.

There is insufficient evidence to assess the full impact of the proposals, although the information already submitted indicates that significant harm would result to the residential amenity in this area and beyond.

- There is no detailed Glint and Glare Assessment, no noise assessment during and after construction, inadequate assessment of the impact of the construction traffic, in addition to inaccurate assessments to determine the full visual impact of the proposals.
- The LVA uses disingenuous application of the indicative criteria for assessing the susceptibility and sensitivity of the residential properties and users of the PRoWs.
- The proposed development would be significantly out of scale with the landscape of ancient woodland remnants and agricultural fields. It would completely dominate this attractive clay valley landform.

The need for renewable or low carbon energy does not automatically override environmental protections. In the overall balance, the harm caused to the landscape character and visual amenities is decisive. This permanent proposal would seriously detract from landscape character and visual amenity. With 2km of PRoW crossing the site, the impacts on the walkers and horse riders will be the most significant of any permitted solar farm in Wiltshire.

Accordingly, the Parish Council believes that the proposed development does not comply with the criteria of Core Polices 57 and 42 of the WCS; it will result in a detrimental impact to the amenity of adjoining buildings and uses.

12) AGRICULTURAL LAND QUALITY

THE GOVERNMENTS FOOD SECURITY STRATEGY PUBLISHED JUNE 2022 STRESSES THE IMPORTANCE OF MAINTAINING AGRICULTURAL LAND FOR FOOD PRODUCTION.

As noted above, **Core Policy 42 viii** *states that standalone renewable installations, amongst other criteria, shall demonstrate how impacts on (viii.) "best and most versatile agricultural land" have been satisfactorily assessed.* We understand that an Agricultural Land Classification survey has been undertaken, although this does not appear within the documents submitted in support of the application.

The Design and Access Statement does note that **Best and Most Versatile land does occur on Potterne Park Farm,** suggesting that it has been avoided whilst highlighting how solar installations have been permitted on such land in other applications. **We question the grade 3b for this solar site.**

In conversations with the landowner, he has stated he consistently achieves yields of 10 tons per Hectare or more. Potterne Park Farm is known to produce good yields of wheat and grass that are well above the regional average and support a rotational beneficial food production and benefits the wildlife and habitat through **The Government Higher Stewardship Level Scheme**.

- **Extensive agricultural drainage systems** were put in the whole of the Potterne Park Farm in 1983 funded by government grants. The depths of **drainage pipes are from 400cms to 1m** hence the overriding concern is that the proposal and construction of the solar panels through pile driving the steel/aluminium panel supports **1.2m** into the ground and by digging or tunnelling cable trenches

across ditches, hedges and PROWs, **will sever these existing functioning extensive agricultural field drainage and ditch systems**.

- This will clearly compromise the land within, and potentially outside the site boundary onto other properties with potential flooding. Additional surface water flooding will reduce the cropping potential of remainder of the Potterne Best and Most Versatile land in the future.

Hence this land could not be put back in the same condition as it was in 50 years time making it all irreversible into healthy productive agriculture.

We believe the figures given (in support of the proposals) for the loss of productive agricultural land nationally to be misleading, when figures from DEFRA indicate that the situation in this southwest region is more severe.

Government research suggests climate impacts under a medium-emissions scenario could cut the proportion of best and most versatile arable farmland from a baseline of 38% to 11% by 2050. Farmers are already facing crop failures year on year due to extremes in rainfall, late frosts, heat and drought. The South West region showed the largest production decrease at 15% from the 2022 harvest.

SO WHY ARE WE BUILDING SOLAR FARMS ON PRODUCTIVE LAND?

Hence, all agricultural land that can grow crops should be retained in agricultural use, to future-proof food production in the UK especially insight of the current global situation.

- A mixed farming system such as the one at Potterne Park Farm has an even greater potential to move to an organic and sustainable future farming system.
- The organic manures and rotational grazing patterns will play a vital part in securing some form of production and soil protection from these extreme weather events.
- The reduced yields from removing inorganic fertilisers and climate change must be considered with high importance when assessing an application to remove around 200 acres from agricultural production until 2074 (well beyond the proposed cut in the proportion of best and most versatile land through climate change).
- It is also vital to consider whether the proposal is truly 'reversible'; we believe the residual impact from the built development and damage caused by constructing, maintaining and deconstruction the solar arrays will be irreversible, permanently removing existing productive agricultural land for future use.

The claim that there could be a combined agri-energy use by using the land for sheep grazing is questionable.

The LEMP (Landscape Environment Management Plan) suggests some sheep can be grazed all year round, only removing them during April and July in some areas for the ground nesting birds. With the potential disruption to agricultural drainage, sheep grazing will not be possible for a considerable proportion of the winter months (possibly late autumn and early spring). Furthermore, the practicalities of solar panels is an area of health and safety concerns for humans and so it would be for sheep. Their welfare is difficult to monitor (i.e. there may be dead sheep that the farmer cannot see or recover). They chew everything and it is impractical to round up the sheep to move them. The grass and vegetation will eventually turn sour under the shade of the solar panels.

Further Investigation has shown no livestock is being grazed under solar panels in Wiltshire and elsewhere for the above impractical reasons.

13) <u>ALTERNATIVE SITES FOR SOLAR</u>

Putting solar panels on industrial buildings is a way forward to provide the sustainable energy required nationally and future proof food supplies for our vulnerable island. A recent report by University College London (UCL) for the charity CPRE (Rooftop solar report 2023) shows the true potential of rooftop solar in helping to meet net zero targets, protect the countryside and tackle the climate emergency.

- Sufficient farmland has already been removed to exceed Wiltshire's ambitious targets for solar energy generation by 39%; no additional farmland in Wiltshire should therefore be permanently removed to meet the Government's net zero targets.
- the applicant stated that in a 2km area there were only 2 brownfield sites nearby in Urchfont. There are plenty outside this radius namely industrial business parks Devizes, farm buildings etc.

14) FLOOD RISKS

Further information on the actual hydrology of the area is essential before the application is permitted.

This is productive soil on top of gault clay - any damage to the existing drainage system across the farmland will exacerbate the flooding potential. The increase of speed of rain water coming off the solar panels will again add to the flooding impact.

It is imperative that all geotechnical studies are done before construction, in addition to cross-referencing other environmental impact assessments with Company's own flood risk assessment. There are clearly areas of surface water, indicating saturated soils despite the agricultural drainage. If you combine the lack of geotechnical information with the damage to the existing agricultural drains (40cms - 1m depth) from the construction infrastructure: scraping back good soil and impacting the same, digging deep trenches, piling to support the solar arrays, hardcore compounds, new perimeter fencing/poles to support the CCTV cameras, lighting systems and permanent footings or the construction of the substation. **The impact is likely to be major and significant.**

The impact to the soils during the construction of the development over 56 weeks must be considered, as the majority of the site is at field capacity during the winter/sustained periods of rainfall. These are not just site-specific impacts, as soil compaction combined with damage to the field drains and increased speed of run-off from the solar arrays could have significant adverse impacts of flooding on adjacent land and in the wider area. The potential impact on neighbouring landowners and water courses must be considered in detail.

This will happen again throughout the life span of the solar site, replacing out of date panels and again when decommissioning and deconstructing the whole site at the end of the 50 year term.

15). POTENTIAL SERIOUS IMPACT ON THE RAILWAY EMBANKMENT.

The potential of compromising the existing Drainage systems and potential flooding could impact the Railway embankment. The NEtwork Rail should be consulted more fully.

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 £millions have been spent on stabilising the soil and embankment along what would be 60% of the length of the solar site. This is a serious and potential safety impact on the network.

15a) WATER RUNOFF FROM THE PANELS

- Water run off from panels increases significantly and faster due to the smooth surfaces of the panels which can cause erosion in the soil and pooling.
- There are no designs for any soakaways, retaining ponds and no measures or mitigation for any pollutant run off during and after construction.
- **On a solar site in Gwent, Wales;** *the speed of water run off from the panels has increased significantly and the land hasn't been able to soak it up so consequently flooding and pollution in the streams has occurred.*

15b) IMPACT ON THE SOIL AND SOIL STRUCTURE

- *The land under the proposed site consists mainly of gault clay. It is very susceptible to compaction, to which end every farmer, including the present landowner has made it their business to avoid compaction by subsoiling, avoiding excess vehicle movements, avoiding working on it in wet weather etc.*
- *The construction and decommissioning process will lead to massive compaction as they will do none of the above. This will have two effects, it causes huge amounts of run off and prevents the soil from returning to productive farming for years as compacted clay is in effect a pond!!*
- *Also unless the land drains are replaced it will never drain properly again anyway.*
- *"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."*

Comments made by workers who have farmed PPF for years

Who will be accountable for returning the site to agriculture if the companies running the site at any time goes bust or abandon the project due to material costs, unable to connect to the National Grid for a period of time due to overcapacity reasons? This will result in an abandoned Industrial site as has happened in Thurrock and another in Devon resulting in Council or landowner having to pay for removal of panels and infrastructure.

16) GLINT AND GLARE

- **The High-Level Glint and Glare Statement by Pager Power Potential** notes that 'impacts cannot be reliably determined for residential amenity, railway operations and infrastructure, and aviation activity at Lydeway Field Airfield. **Detailed modelling and not just desk top calculations are recommended.**
- Furthermore, the potential impact on military aircraft must be assessed first and foremost. Helicopters and Transport planes regularly use this valley as a low flying corridor and practise area as part of their essential training exercises in conjunction with activities on Salisbury Plain.
- **The MOD should be one of the consultees to have been notified in the first instance.**
- The Glint and Glare assessment stated that this could cause a problem to the drivers of the trains due to the arrays facing south, southwest in parts but needs to be further researched in conjunction with Network Rail and Rail companies. They stated they found no signals that could be affected along the length of the site. There are several important signals along that length of railway track that could be impacted by the positioning and angle of the panels. Network Rai should be informed with more detailed information.
- The many residents along the line of the site are positioned above the site and will get the maximum glare however bright in daytime and including on full moonlit nights.
- We are not aware of a **final** glint and glare assessment based on the points raised above which should be an essential element of this Application.

IT IS VITAL THAT THIS INFORMATION IS PROVIDED, IN ORDER TO DETERMINE COMPLIANCE WITH CORE POLICY 62 AND TO ENSURE SAFETY AND THE AVOIDANCE OF EMERGENCY SITUATIONS.

17) NETWORK AND PROJECT SHORT COMINGS

Summary of network aspects related to proposed Potterne Park Farm by Ash Wilson (Post Graduate iResearcher in Public Sector Renewable Energy: January 2023) provides a full analysis of the short comings of the proposed design.

- Many of the quoted 'green energy benefits' associated with PPFS seem either inflated, wrong or misleading. 4.7.2 of the Planning, Design and Access Statement states:
- **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. Some of the site characteristics (north facing slope, near elevated woodland) are very likely to impact the inherent efficiency of the proposal.
- **21,500 tonnes annual CO2 saving**: The Department for Business, Energy and Industrial Strategy 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 in the planning application). But even this figure does not take the carbon footprint of the 132Kv substation proposed which have an estimated 9,000 tonnes CO2e footprint, or the carbon footprint of the construction phase (estimates of which are totally lacking in the applicant's documentation but are likely to be significant).
- **15,000 homes powered:** Ofgem currently estimates that a typical household has an annual power requirement of 2,700kWh of electricity and 11,500 kWh of gas. Using these figures 60,000MWh would power 4,225 homes. But given the seasonal mismatch between supply and demand, fewer than 1,000 homes could actually be powered during winter.
- 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.
- The proposed substation/connection point to the high-voltage network would be a large construction project, and would create a very strategic and enduring asset. To leverage this 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.
- Given the Northerly aspect of the site and the fact that the site has no batteries, it is highly likely that the project will fail to meet its contractual obligations to SSEN. Therefore, they may well resort to installing diesel generators as is the case at the local Melksham solar farm - using some 18000 litres p day. This undermines the green energy case.

18) FUTURE OF SITE

The company Stark are only the facilitators of such projects and get the upfront details and planning permissions in force then will hand over/sell on to other companies to construct and operate over the 50 year tenancy.

Hence any conditions that would be stipulated on such developers for maintenance, and deconstruction will be difficult to be enforce in the future. Therefore the developers should be made at the beginning of any development, accept a legal OVERAGE document and/or a financial Bond to cover the deconstruction of the site in the future.

19) FAILURE of COMMUNITY ENGAGEMENT AND DUE PROCESS

Para 9.1.1 of the Consultants Design A Statement (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 not what happened, they had already applied before the consultation and did not take into account any of our feedback.

The only public consultation was on 28th November 2023 in Potterne village hall, and subsequently we found out the planning applications were actually put in on the 24th November and 27th November 2023.

The applicant has failed in many areas of due process, including Community Engagement. The Public Consultation exercise was not advertised in this parish. We were not informed about the proposed public exhibition on the 28th November 2023 in Potterne Village Hall, only becoming aware of this through word of mouth. No posters, emails or invites for key stakeholders sent to members of Easterton Parish Council, when we are **significantly** affected by the proposals.

- **This public consultation lacked information relevant to this area and neglected the impact on the local communities and surrounding area.** Many of our parishioners did attend, the meeting and tried to discuss the proposals with representatives of the Lighthouse Development Team. The displays provided were inaccurate; the rights of way were not detailed, the images of the solar panels were misleading (photos of other solar sites) and no photomontages of site-specific impacts were provided. The village of Easterton wasn't even on their maps, neither were details of surrounding properties acknowledged on both sides of the valley.
- The Applicant's claim that the feedback from this event was positive; **this is not the case.** The Statement of Community Involvement was uploaded on 5th December and it contains none of the online comments made by residents and we know that the vast majority of those comments were against the proposal.
- The Statement of Community Involvement is also misleading as no one on the List of Neighbours Notified were in fact contacted/notified with any form of communication prior to the planning application being put in to Wiltshire Council on 3rd January 2024. Many of those neighbours received letters over 2 weeks later which made the deadlines for a measured response difficult.
- Community benefits - the consultants claim to have discussed the potential benefits to the community but this seemed to be directed to Potterne only not Easterton. Potterne have verified that they had not had any discussion with the consultants.
- **Lack of transparency in this community engagement process is a serious failure of due process. The document mis-represents the public and therefore misleads the LPA. Integrity and transparency are vital in public decision making particularly when such a vast development affects so many people's lives.**
- To illustrate the strength of opinion against this proposal, Easterton PC held and Extraordinary Meeting on the 11th December 2023. This was attended by 53 local people, all of whom raised points against this proposal. The Ordinary Parish Council Meeting *(*January 8th 2024) to discuss the submitted planning application was attended by 10 members of the parish who wanted to air their objection to the application.

Regarding the whole planning Application - this process carried out by the consultants and developers Stark has been in a manner that is making it difficult for all consultees and members of the public to assess and make valid comments on the planning portal.

20) ERRORS CONTAINED WITHIN THE APPLICATION

Easterton Parish Council are in agreement with Potterne Parish Council on the following:

"planning documents frequently contain basic errors'. **For example, in the SCI the address is given as Kimblewick Solar Site, Buckinghamshire and in another document there's reference to Buckingham Council;**

There is reference in the DAS para 4.3 to battery storage units but there is 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 para1.1.3 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 projects. We suggest the LPA should view all other "facts" with suspicion."

21) OMISSIONS FROM THE APPLICATION

Easterton Parish Council are in agreement with Potterne Parish Council on the following:

'There are a number of important issues that have been 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, glint/glare survey - to name a few.
We believe that these omissions have been deliberate to give the applicant wiggle room to amend the application at a later date"
We concur with Potterne Parish Council's view: ***"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 serious omissions. Arguably the application should be considered void for those reasons. '***

22) CONCLUSION (THE PLANNING BALANCE)

This application for a large scale solar energy installation is not in accordance with National and Local Planning Policy, and Wiltshire Core Policies and Climate Delivery Strategy therefore should be refused.

- It would present as a stark industrial mass of metal and associated infrastructure, with significant harm to the natural environment and amenities of the area. We cannot see how this site could be viable without batteries; these would also contribute further to the industrialisation of the landscape.
- If this Parish Council, as part of its Green Policy want to encourage our parishioners to decarbonise with green energy, it is clear from Ash Wilson's report that this application would remove any upstream capacity to do so.
- The CPRE report (Rooftop solar report 2023) shows the true potential of rooftop solar in helping to meet net zero targets, protecting the countryside and tackling the climate emergency. No additional farmland is therefore required to meet the Government's net zero targets. See the Swindon shopping centre covering the roof with solar panels - enough to supply circa 50% of its energy needs.
- **We do not believe the site has the environmental capacity for this proposal. We believe it will result in significant environmental damage and potentially criminal offences in terms of the protected species on and around the site. There is no community benefit from this industrial scale proposal. It will compromise the ability of our residents to seek alternative energies. Wiltshire Council have also permitted enough solar farm development in less environmentally sensitive locations to exceed their most ambitious target for solar capacity by 39%**
- It is clear that from an initial visit, the current applicant felt that the site had potential. As the desk-based survey information began to come in, it was abundantly clear that the site had far more environmental and ecological significance than initially anticipated.
- The site boundary has clearly been amended to try and remove these significant constraints from the planning balance. The impact of this scheme cannot be determined until the site boundary follows actual field boundaries and the site surveys include every feature within these boundaries.
- There needs to be more cumulative impact assessment between the experts and the reports submitted; there are significant impacts identified where the mitigation proposed will have a detrimental impact on biodiversity.

We believe that the omissions and inaccuracies across all the reports submitted mask the true impact of this proposal on this rural site.