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Planning Case Officer
Wiltshire Planning
Trowbridge
Wiltshire

24th July 2024

**Easterton Parish Council Response to revised information submitted to application
PL/2023/10332 Potterne Park Solar by Stark Energy and Lighthouse**

Dear Mr. James,

We are writing to reaffirm Easterton Parish Council's original objections to the current solar planning application PL/2023/10332 Potterne Solar and respond to the applicants' superseded documents by the same.

Upon review of the latest resubmitted documentations from Lighthouse Developer Consulting and Stark Energy, we have found that there is no additional information or mitigation measures provided that address the concerns the EPC and others have previously raised in the first consultation and comments. Regarding your set of questions sent to the applicant after the first consultation, the applicants have made no attempt in answering them direct or summarising the possible mitigations. Any answer if at all, is hidden in the same original documentation that is incorrect in the first place. The Design and Access Statements submitted by Lighthouse remains the definitive proposal document which is still incorrect - how can this be? They have had two chances to submit statements and assessments to satisfy the planning but have failed both times. This to our mind is unprofessional conduct and does not inspire any confidence in the applicants. The applicant is not respecting the Core Policies of Wiltshire.

Specifically, our objections are based on the following areas:

This is a North facing site which is bound on two opposing high escarpments sides (North and South) and ancient woodlands. This is not suitable land in the first place for solar and maximum efficiency as it is subject to shading by the woodlands on the escarpment on the south side and other mature trees on the site itself.

ENVIRONMENTAL IMPACT: This still has not been addressed in full or how the mitigation would be implemented. Lack of in-depth answers to the questions.

LANDSCAPE VISUALS

There is still of major concern that this unique environmentally rich valley and landscape will be highly impacted and compromised by the size of the site for solar and the huge number of solar arrays. The applicants have still only put forward a basic LVA and have ignored the Landscapes Officers request for a more substantial LVIA.

There is continued underreporting of the sensitivity of the existing landscape and related surroundings.

SCREENING

This was a desk top modelling and has ignored the opportunity to do a site visit to understand the topography and impact this site will have on the receptors and the users of the PROW. No amount of screening will hide the solar panel trays from all receptors on either side of the site as they are all above the site looking down. The indication that the new planting of trees will be effective screening after 5 years is laughable.

GLINT AND GLARE

No one from Pager Power has ever visited in person the site nor any of the receptors on both sides of the site. Therefore, we would say that this desk top study is insufficient and does not relate to the reality of the site and surrounding ground and receptors. The assessment has also ignored along this length of line the **2 essential Whistle Stop Boards** (to warn pedestrians legally crossing

the railway to and from Potterne Park land and workers on the line) and the **2 red signals** further down. All are in the line of the solar array orientation.

The study by Pager Power has been done on a desktop modelling system using Google maps as their sole available aerial imagery showing the valley in full summer and leaf cover only.

May we point out when trees are in full leaf there is low to high impact for the different receptors, properties and railway but when there are no leaves and vegetation during autumn and winter the full impact of the solar arrays will be evident and be of **high impact** to the same. (Forest Farm will have High Impact all year round.)

No amount of screening will shield any of the receptors on both sides of the valley from the solar site and glare. New plantings will take more than 10/15 years to become an effective screen and even then, they would not efficiently screen the glint and glare or the arrays.

There are in this study, the words *inconclusive* and *predicted* - resulting in a definite impact answer! Pager Power have stated 'Existing vegetation screening is .. **inconclusive** on a review of the available imagery. and have stated in the **predicted** classification column ... **Low impact**. Hence how can they state that the receptors numbered on the south escarpment have **Low impact** such as Forest Farm which is 175m away from site and has the full view of the whole site and **No impact** such as West Wood and others along the ridge overlooking the site.

IF IT IS INCONCLUSIVE THEN YOU CAN'T MAKE A DEFINITE DECISION ON IMPACT

THE RAILWAY ASSESSMENT/STUDY

This completely missed out or failed to take account on this stretch of railway, the essential 2 whistle stop signs required to signal the pedestrian and horse crossing (across railway line) and the 2 red-light signals. The mapping show that there could be glint and glare affecting the whole of the adjacent railway users. The receptors above there always get glare from the trains themselves at certain times of the day.

TECHNICAL DETAILS:

The applicant was specifically asked to supply clarification regarding the "the solar generating power of the panels" as far as we can see the new documentation has not addressed this request. It appears that there is excessive overplanting of panels and over size of the site to meet the 50Mw capacity - due to the nature of the site being North facing? Stark energy has gone from 50Mw to 70Mw then back to 50Mw in their website? Which is it?

PUBLIC RIGHTS OF WAYS PROW'S PROTECTION AND SAFETY OF LEGAL USERS.

The PROW management plan for construction and after has not been submitted.

The British Horse Society and the Wiltshire Bridleways Association comments on the bridleways becoming unusable as a consequence of the construction and future operational use of site regarding Planting schemes has not been addressed. This would have legal implications if not addressed.

There are no plans as to how the safety will be assured for the legal PROW users during construction and after and have not assessed the frequency of use.

Noise from inverters and substation and the effect it would have on PROWs users namely sound sensitive horses, and other animals, birds etc. it has been established that the noise does have an effect on birds, bats and other mammals including humans.

They have called the 2 Bridleways as tracks and footpath access a track.

ECOLOGY

This is still of major concern when the applicants' surveys have ignored the delicate ecosystem and habitat balance across the valley from the ancient woodlands bordering both sides of the valley.

The applicants have not shown nor answered satisfactorily the requests by Ecology Officer Elizabeth Burrows for the Base Line statement and the Biodiversity Net Gain statement.

Therefore, the applicants have been non-compliant.

The surveys so far have been lacking depth and understanding of the ecology and habitat of this particular valley. Hence there should be a much more in-depth survey in this area alone.

The important commuting and foraging grounds for wildlife that will be disrupted by this application as has been pointed out in the comments submitted - notably by the parish councils of Easterton (WC-24-02-293859) and Potterne (WC-24-02-293920), and by experts Jo Darlington (WC-24-02-293557) and Gareth Harris (WC-24-02-293518).

There is a lack of detail and recognition on the existing habitat and species specifically the rare bats, Great Crested Newts and other listed Annex II Red listed mammals seem to have been dismissed when in fact they are very much in evidence. The GCN are not just restricted to one pond as Assessment states they are evident all through the site ditches and drain covers for hibernation and breeding. **The documents still do not give the essential detailed baselines that they can work from to correctly identify the wildlife and habitat and in-depth surveys etc. especially for the rare bats that use, roost and forage across the site today.** Putting up Bat boxes will not mitigate the loss of suitable trees especially by a noisy substation and near inverters for noise and light sensitive bat species.

ARBORCULTURIST IMPACT ASSESSMENT survey is not sufficient in detail and ignores the important habitat of the whole valley with a statement '**There is no ancient woodland at or joining the site**'. This is completely incorrect - The site is bordered on both sides by ancient woodland and there are pockets of important woodland and individual across the site. These woodlands are import for the wildlife foraging or commuting from one area to another and cannot be replaced.

This needs more in *depth surveys to have the baseline of the importance of keeping the old or decaying ancient broadleaved trees, hedges and vegetation in general. These are used today by roosting, lactating and young Barbastelles bats amongst other mammals, invertebrates and birds.

*Ground Based and Lidar derived measurements reveal scale dependent selection roost characteristics by bat Barbastella barbastellus Forest ecology and Management Andrew Carr, Matt Zeake, Andrew Weatherall, Jeremy S P Froidevaux, Gareth Jones et al University of Bristol and National School of Forestry

: Journal Homepage: www.elsevier.com/locate/foreco

The indication that the new planting of trees will be effective screening after 5 years is laughable.

AGRICULTURAL ISSUES:

No Agricultural assessments and Soil analysis facts and figures have been put forward by the applicants as requested and are therefore non-compliant with the Planning Officers requests. Therefore, the grading of the land should be carried out by independent assessors.

Sheep grazing is a fallacy - at one sheep per hectare only allowed in winter to graze on wet ground when grass has no goodness in it and sheep only graze on short swathes of grass. They also can destroy equipment and chew wires and rub against posts! Not ideal for solar panels.

The quality of the grass will deteriorate throughout the duration of the site and will not be of benefit to any grazing animal.

THE DRAINAGE REQUEST BY THE DRAINAGE OFFICER HAS NOT BEEN ADDRESSED

DRAINAGE: the map Appendix B showing field drain systems. There should be the Government approved plans in existence (held by the landowner) as these field drains systems were put in under government funded system. These should be shown as the definitive mapping and should be in the possession of the landowner. The systems are still intact and working.

The renewed diagrams for the solar panels still do not show the depth of the metal panel supports. These will pile driven in and be deeper than the existing drainage pipes and will damage the existing drainage system and lead to increase in surface flooding.

The applicant has not realistically addressed the water runoff and outlined any attenuation measures for excess water. They have not answered drainage nor any mitigation measurements if all the existing drainage systems are damaged the construction of the solar arrays.

There are no plans for ditch maintenance and protection.

MAINTENANCE AND ENFORCEMENT OF FUTURE MAINTENANCE OF SITE AND HABITAT.

Hand weeding - this seems unlikely to happen. There are no maintenance enforcement plans in

the documents for the future of the solar. Who will do the maintenance and make sure that it will be in accordance with the submissions. **How will Wiltshire Council Planning enforce the conditions and maintenance plans into the future?**

Wildflower meadows need poor infertile soils and need regular maintenance over years to maintain the flowers. If not maintained the flower meadow will become superseded with grass and land would eventually return to scrub. **No on-going maintenance plan has been put forward.**

ACCESS

The new revised CTMP document does not address the serious safety issues already raised in the first consultation comments. The access off the main A 360 / Potterne Wick Road is still a serious safety issue and again we have not seen any improvement or mitigation that would make the construction traffic manoeuvre any more safely.

Please note that previous owners of Potterne Park Farm were refused planning permission for semi-industrial developments on the grounds of access. (under Kennet Planning). this application is worse.

The new CMTP estimate of 245 vehicle movements in total are still underestimated and a logistics expert has estimated that there would be over 900 deliveries alone.

The facts and figures in the Applicants CTMP statements are still based on another site in Uttoxeter which is half the size which is not similar to Potterne. The cut and pasted information data is still inaccurate and not relevant to the PPF site. No two sites are the same hence you cannot use the same numbers and statements as put forward by the applicants.

ARCHAEOLOGICAL REQUESTS by the Archaeological Officer has not been answered hence the applicant is not compliant to the Council requests.

SUBSTATION.

There are no building/construction details of groundworks for substation as this would be termed a permanent building and would require the correct building regs.

lack of information still on the lighting, the CCTV construction, the safety considering the recent fires in solar sites.

THE APPLICANTS USE OF APPEAL DECISIONS: PARK FARM GILLINGHAM AND ASTON HOUSE FARM, DERBYSHIRE.

These are ridiculous comparisons when Gillingham land is Grade 4 described as 'flat and gently undulating landform with NO 'valued' landscape' and that 'the area is not inherently sensitive to solar PV development'. This comparison bears no resemblance to Potterne and should be wholly disregarded.

The data used from the PV site Uttoxeter, Aston House farm, Derbyshire is half the size of Potterne and shows another cut and paste of information and bears no relevance to Potterne. .

The applicant has yet again not followed due process and taken the opportunity to right the wrongs and provide the answers to make a better pitch. As you have stated" ***If the amendments do not satisfy the concerns raised above then the application would also proceed to a refusal***"

These issues remain unsatisfactory or unaddressed, therefore our stance remains unchanged. The additional submissions do not change the original objections. We urge the planning committee to consider these points as unresolved issues and therefore the application be refused.

Easterton PC.