Ref: PL/2023/10332 – Solar Farm - Land South of Potterne Park Farm, Potterne,

Devizes, Wilts, SN10 5QT

Easterton Parish Council – Objection to Proposed Solar farm:

EASTERTON PARISH COUNCIL (EPC) CONTINUE TO STRONGLY OBJECT TO THIS APPLICATION

EPC continue to strongly object to the revised planning application and amended documents for the proposed solar farm located at Potterne Park Farm. EPC objections are based on significant concerns from Councillors and residents regarding the environmental and social impacts of this unsuitable project which EPC believe are not mitigated by the original application or subsequent amendments. Our initial objections to this proposal remain and should be considered alongside this revised comment. EPC suggest that this new documentation does not offer any new improved or valid mitigation reasons or legitimate, well researched data for this proposed solar site to be approved.

EPC do NOT object to the principle of a suitable and well sited solar provision however this proposal is ultimately in the wrong place on a North facing slope bordered by two high escarpments, important Ancient and semi Ancient woodlands, important ecological habitat, overlooked by 74 residents with 5 x well used PROWs used by many walkers and riders from surrounding villages and schools.

The solar benefits do not outweigh the significant and lasting harm to the landscape, ecology, visual amenities and agricultural utility of the site.

The application is still littered with incorrect place names (e.g. references to Easington instead of Easterton) and valuable environmental considerations and data associated with the site are still not considered. The LEMP and LVA do not consider important woodlands such as Folly Wood, Parham Wood, Kingston Wood in their data and their importance to the valley. This scant attention to detail is, in our opinion, reflected throughout the application and questions raised by this council previously have not been answered in the revised documentation.

EPC objection is based upon:

1. DUE PROCESS:

The process that WCC set out in April stated: "WCC would be prepared to accept one comprehensive suite of amendments….those amendments will only be accepted if an extension of time of a minimum of 13 weeks beyond the current determination is agreed. If you are unable to agree to this then the application would have to be refused in line with the concerns raised above".

• The applicant has allegedly failed to adhere to due process, submitting critical documents late – or not at all.

• The applicant has supplied inadequate responses to the questions from the planning authority and indeed other objectors including EPC.

• Despite WCC asking for the applicant to provide archaeological survey in support of the application these do not appear to have been forthcoming.

• The applicants have not supplied the required photomontages to show the dominance of the solar panels and substation when asked.

• Areas of habitats adjacent to the proposed development area have been left un-surveyed and unincluded in baseline data by GE consultant despite multiple previous objections on this basis.

• Inadequate, desktop, offsite data and no essential data baselines on glint and glare, noise, high frequency acoustics, archaeology and ecology. This is considered an essential requirement for informed assessments.

2. INAPPROPRIATE SITE LOCATION

• The site is North facing, making it unsuitable for optimal solar energy generation, particularly during winter when energy demand is higher. Under the National Planning Policy Framework (NPPF), this site does not meet the criteria for sustainable development due to its limited energy efficiency and being North facing.

• The applicants LVA suggests the area is a "hidden valley," but there's clear evidence of visibility from multiple receptors including residents in homes on both sides of the valley and prominent viewpoints from local escarpments and from further afield such as the Pewsey Downs. This is a significant oversight in the assessment demonstrates significant discrepancies between the LVA's conclusions and the reality of the site.

• The site falls adjacent to the Landscape Sensitivity areas 1and 2 of the Wiltshire Renewable Energy Study (2023). This shows that this area is not suitable for large scale solar sites. The application's shortcomings are further compounded by the site's specific solar and localised weather patterns and exposure limitations. The movement of the sun and shorter daylight hours during autumn, winter, and spring highlights the inefficiency of the proposed site due to the following factors:

Sun Trajectory and Topography: The sun rises from behind the south-facing escarpment and surrounding woodlands and traverses a lower arc in the sky compared to summer. This seasonal trajectory impacts sunlight and daylight availability across the site especially in winter.

Extended Shadows: The hills, woodlands, existing trees, and hedgerows cast long, low shadows over the fields during these seasons. These shadows reduce the direct sunlight and daylight reaching the solar panels, significantly lowering the site's energy generation capacity.

The compounded shading from natural features and the reduced solar angle during much of the year (autumn to spring) suggest the site is sub-optimal for a solar farm. This inefficiency undermines the feasibility and sustainability of the development and suggests the overly large size of the proposal is to try and compensate for this sub-optimal efficiency.

3. PERMANENT INDUSTRIALISATION AND EXPANSION OF SOLAR RISK

• The proposed 250 MW substation exceeds the capacity of the solar farm (49.9 MW), suggesting potential future expansion to 700–1,000 acres of farmland.

• The large scale of the proposal seems driven by the need to compensate for suboptimal energy production, which raises questions about the appropriateness of using such a sizeable area in a unique valley.

• Lack of detailed construction and structural plans for the substation raises major concerning questions about its environmental impact and permanency.

• Lack of lighting information, CCTV information and construction plans.

• Lack of details on pile driving in the supports for each panel.

4. VISUAL AND LANDSCAPE IMPACT:

The amended LVA (not the requested LVIA) has tried to take in to account the proposed Blount's Court solar development. Their illustration clearly shows that this proposed site (if approved) and the proposed Potterne site will have a major impact on the landscape and visibility from around the larger area.

The site is bordered by important ancient and semi-ancient woodlands, mature trees, and important hedgerows that contribute to the valley's ecological and historical value. EPC strongly believe that the proposal would result in the industrialisation of a tranquil and ecologically rich rural valley, permanently altering its character and utility.

• Major and harmful visual impact on the landscape is seen from both sides of the valley and beyond. The development is highly visible to 74 residences and 5 Public Rights of Way (PROWs), which are actively used by residents, walkers, and horse riders.

• No amount of screening of trees and hedges will obscure the site from all the residential receptors on either side of the valley or from the users of the PROWs in the area. New plantings of trees and hedges will take 10 - 20 years plus to effectively screen anything at ground level and will never provide screening for residents either side of the valley who overlook the site.

• The applicants additional photos claiming to show limited impact from PROW are considered misleading as they only look in one direction away from the site. Claiming the solar development has no impact because of the 'tunnel of trees' screening the site is grossly misleading because the view in the opposite direction reveals the whole of the solar site. The PROWs run directly through the site therefore as previously stated by EPC there is a MAJOR visual impact on the landscape locally on users of these routes.

• The applicants refer to the bridleways as footpaths which completely ignores horse riders as receptors. Horses' needs and susceptibility to noise and high frequency acoustics are totally different to just walkers.

• Claims in the glint and glare assessment are inaccurate, relying on desk-based studies rather than on-site surveys with NO BASELINE to compare. The applicants claim that there will be no visual impact upon residents – thus is simply untrue.

• Visibility changes drastically between seasons (e.g., when trees lose foliage). Residents, including those at properties situated above the site, for instance West Wood, Hilltop, Wick farm, Potterne Wick etc., will face significant visual impact all year-round. The applicant has supplied desk top assessments and studies using google images in full summer foliage only. The visual impact on any receptor is totally different in the autumn/winter and spring when no foliage is present – this has not been considered in any way.

• The height and number of arrays plus the fencing and lighting has a major impact on the visual impact to the users of all 5 of the PROWS and the residents on both sides of the valley.

5. ECOLOGICAL, ENVIRONMENTAL AND AGRICULTURAL BIODIVERSITY CONCERNS

The site is a habitat for protected bat species and red-listed bird species and Great Crested Newts but the applicant has continued to ignore the broader ecosystem connectivity and all the other wildlife recorded on-site and immediately adjacent. EPC believe the valley's existing biodiversity, including wildlife corridors, known foraging areas in the open fields, supported by existing hedgerows, woodlands and ancient habitat rich trees will suffer irreparable harm.

• DEFRA mapping portal MAGIC have designated the whole of this valley as supporting Great Crested Newts yet this is still ignored by the consultants as in previous documents. The updated mitigation supplied is contradictory to the actual ecological impacts on protected species.

• The applicants and consultants have given misleading and assumptive information based on very limited surveys by ecologists from outside the area. The consultants have seemingly dismissed the existing minimum 10 year recorded study and data carried out on site by experienced ecologists and ornithologists who know this area intimately. This data, available from the Wiltshire Record Centre, holds validated and comprehensive information on the existing habitat and ecology which would inform the correct baseline for any consultant to work from and give more informed results.

• Assumptions or conclusions based on insufficient data will lead to misleading recommendations or overgeneralisations - this applies to the new recent amendments by the applicants consultants.

• The farm has been farmed on the Higher Steward Scheme and has therefore been positively farmed to improve biodiversity. The building of this huge scale solar farm will potentially destroy much of this and a 10% BNG is easily achievable from the inaccurate baselines provided by the applicant – EPC believe that this development will result in a significant biodiversity loss.

• The site represents Best and Most Versatile (BMV) farmland, vital for future food production.

Short-Term Study by applicants Ecologists

Limitations:

• Duration: A one-year study captures only a snapshot of the ecosystem, missing long-term trends, seasonal variations, and rare events better captured in available data.

• Contextual Understanding: External ecologists may lack nuanced insights into the area's specific ecological dynamics, historical changes, and subtle habitat, seasonal variations and species interrelations. They should use existing recorded data for baselines in order to understand this unique area.

• The suggestions that the bats are of no real significance holds no validity. The 11 -13 known protected bat populations that forage in this rich habitat valley have been surveyed for over a decade by ecologists on a regular basis. This recorded data has a high potential to prove the significant impact and the additional on-site bat roosts but yet is not taken into account.

• Bat Echolocators should NOT just be positioned in the hedge/tree margins. They should also be positioned in open fields to gather the true data and types of bats that are foraging across the area. Despite the GE consultants only positioning echolocators in hedge borders, results demonstrate numerous bat passes during survey periods. This actually reinforces that the

whole Potterne Park Farm field system is used as movement corridors and rich foraging areas. There are known roosting places for breeding and roosting bat species across the valley. To dismiss all bat species under a single "bat" reference is not acceptable as each species has its own way of utilising the area at different times. Barbastelles move roosts from one area/tree to another and they live in small groups while other species live in larger numbers on a more permanent basis. They forage known routes from wooded margins across and above the open fields.

• EPC question the validity of bird surveys undertaken - The amended document makes no reference to recorded bird species including Corn Bunting, Pied Wagtail, Yellowhammer, Goldfinch, Swallows, Mistle Thrush, Linnet , Dunnock, Spotted Flycatcher and raptors such as Hen Harriers, Buzzards, Kestrels, Sparrowhawk and Red Kite.

• To concentrate, as the application does, on just Skylark is not a sufficient informed baseline. It has been noted in the solar site in Lyneham that the skylark population has in fact declined over the period of being covered with solar arrays.

• Any disturbance across the open landscape and in the margins will have a major impact on many mammals such as Dormice, Harvest Mice, Hedgehogs, Deer and Badgers and reptiles such as Slow-worms, Grass Snakes and Adders which are recorded in this area. This is not considered.

• Fencing will prevent the natural movement of mammals across the area disrupting the natural balanced ecosystem. Potentially this will push these mammals towards the railway line and areas with busier roads (A360) away from safety and sanctuary of this valley and increasing risk of accidents.

• The suggested position of Bat and Owl boxes in the area and trees around where the large Sub-station will be positioned is totally unsuitable due to noise, acoustic frequencies, and light emitted from the sub-station.

• Provision of bat boxes do not mitigate the loss of habitat or provide gain in BNG. West Wood has contained bat boxes over 10 years, but they have had limited occupancy despite a known high bat population. The bats prefer the natural spaces in West Wood, Folly Wood , Parham Wood, Potterne Wood and Potterne Park Farm as their roosting and nursery sites.

• The richness in wildlife habitat on this valley is due in part to the Higher Stewardship Scheme and rotational grazing employed by the incumbent farmer but this would be changed by the construction, operation and deconstruction of solar panels.

• The ecological survey has ignored the fact that the cattle and grazing on this land has an important role in keeping the soil alive and in good condition, essential for the invertebrates, such as the dung beetle, essential for the bat populations and other species reliant on invertebrates for food.

6. BIODIVERSITY NET GAIN

• There is a lack of specific mitigation measures or substantive data on Biodiversity Net Gain (BNG) and how this will be provided above the questionable baselines.

• The submitted Landscape and Ecological Management Plan (LEMP) lacks enforceable BNG guarantees over 50 years.

• As previously stated in EPC objection, the land in question will be drastically impacted during construction, operation and deconstruction. This land/soil would get compacted to the point to return it to agricultural land of use will take at least 10 more years to be as productive as it is now. (ADAS survey for the Welsh Government) Hence to 'return' the land to what it was equals 5-10years + the 50 years of solar equals 55 - 60 years of loss of food productive land and effective carbon sink. Soil analysis and proper land grading studies have not been supplied, despite being critical for assessing the site's agricultural value.

• Misleading claims in the applicants' documents referring to grazing sheep do not account for the impracticality of managing livestock under panels on wet ground during winter months. Proposed grazing densities (1 sheep per hectare) are far below sustainable levels (normally 5 per hectare).

• There are contradictory statements in the application relating to the use of weedkillers and chemicals on site. Their use is referred to in some documents but elsewhere it is stated that chemicals will not be used.

7. NOISE ASSESSMENT

A lack of Baseline Measurement is readily admitted in consultants document. Without an established baseline, it is impossible to justify or contextualise the noise levels presented in the applicant's documentation. The unique characteristics of the valley demand specific, on site, localised noise modelling.

The applicants should have conducted a site-specific baseline noise measurements to reflect the valley's actual/existing acoustic environment. Noise assessment should have been carried out on site to understand the topographical and acoustic dynamics of the valley. An independent acoustic expert should be used by Wilts Council to verify the accuracy of the modelling and its assumptions in a rural area.

Acoustic Characteristics of the Valley:

• The valley's natural quietness makes noise disturbances more noticeable, even at lower levels. The escarpments create a channelling effect that amplifies and carries sound upwards to residences situated along the ridges. This contrasts sharply with open, flat urban areas where sound disperses more evenly.

• There are no white noise or EMF assessments which will affect wildlife and humans alike.

Flawed Modelling Assumptions:

• The applicant's noise assessment appears to be based on models suited to industrial or urban environments with flat, open land not a rural valley.

• There is no baseline evidence of real-life noise modelling specific to this valley's unique topography and residential layout.

• No background assessment has been carried as per BS 4142 to measure the actual difference between the planned Solar and equipment and the present background noise levels - this has only been assumed by desktop modelling.

8. SAFETY AND ACCESS DURING CONSTRUCTION, OPERATION AND DECONSTRUCTION OF SOLAR SITE.

The construction traffic and number of associated vehicle movements are still inaccurate and misleading underplaying the impacts of vehicle movements, road damages, PROW safety, road safety, and congestion along the Potterne Wick Road.

• There are still no safety mitigations on the construction and maintenance vehicles leaving the dangerous corner on A360 into Potterne Wick, through a very narrow road with houses on each side, along the narrow private road to farm and site, and then along a public footpath. Wiltshire Council Highways have previously objected and should continue to do so on the grounds of safety. EPC consider the proposed access from the A360 as unsafe, with no effective mitigation for increased traffic and their impact on pedestrians, cyclists, and horse riders.

• There are no Emergency Access documents or mitigation in the event of panel fire especially access to the south side of the site. EPC is aware that this has occurred on other sites.

• Previous objections regarding access remain unresolved, despite significant local concern.

9. FLOODING AND DRAINAGE ISSUES:

Historical drainage systems on the site remain functional allowing for a slowed run off exacerbating surface water flooding, contradicting claims made in the LVIA report. The site regularly experiences flooding, particularly at the northern end, making it unsuitable for development but a suitable area for water holding in exceptionally wet weather.

• Driving 2-meter-deep posts for panel installations risks destroying the drainage system. The applicants have ignored this aspect and have not offered any mitigation to save this system.

• The drainage channels have recently been cleaned and even with the amount of excessive rain that has occurred in the past year the fields are draining well. Any damage to the drainage system will cause an increased flood risk to the development and potentially damaging the railway embankment

• The applicants have used figures and weather patterns based on Lyneham which is over 20 miles away and north of this site and does not follow the same patterns here. This valley has its own microclimate on many days compared with surrounding areas such as Devizes. The fog and mist in autumn and winter does not clear as quickly because of the topography compared with a more open site. It often is quite different weather patterns to that of Devizes less than 5 miles away from the site, let alone Lyneham!

10. CUMULATIVE IMPACT OF SOLAR AND HOUSING DEVELOPMENTS IN WILTSHIRE

Strategic Alignment:

• The site’s capacity and grid connection are questioned, with alleged misalignment with OfGem's strategic priorities and a potential to hinder other solar initiatives such as rooftop on housing or other more efficient renewables.

• WCC need to consider the cumulative impact and overdevelopment in the area, with six solar farms already present within a 5-mile radius and 6 more in the area in the pipeline!

• Combined with ongoing housing developments, this solar project contributes to the cumulative loss of agricultural land and worsens local infrastructure pressures.

• Alternative solutions, such as installing solar panels on industrial buildings, business parks, or even manmade bunds (e.g., Birmingham Airport), are far more appropriate than using agricultural land.

11. GLINT AND GLARE:

• The desk top modelled visual assessment presented lacks on-site evaluation. EPC are concerned that the lack of concern for glint and glare will impact the quality of life for both residents and wildlife.

• The amended Glint and Glare document regarding the railway still does not accept that there are important signals and whistle stop signage along the length of the site.

• EPC believes that Railway Authorities still have not been consulted fully informed or consulted and are concerned at the related risks.

CONCLUSION AND REFERENCE TO PLANNING POLICY:

EPC strongly believe that the original application and subsequent revisions do not meet the Wiltshire Core Policies requirements (as below) and hence **permission should be refused**.

Policy 51: Landscape

Key Concerns:

• Lack of assessment regarding the visual impact on surrounding areas.

• Insufficient photographic evidence, including necessary photomontages, to evaluate landscape effects.

• Absence of consideration for visual impacts on local residents overlooking the site and on users of Public Rights of Way (PRoW).

• Inadequate glint and glare study, essential for understanding reflective impacts.

• Overall poor-quality landscape impact assessment.

Impact: These omissions prevent a full understanding of how the development would integrate into or detract from the surrounding landscape.

Policy 50: Biodiversity

Key Concerns:

• Potential destruction of biodiversity previously enhanced by the Countryside Stewardship scheme.

• Reliance on provisional surveys, with critical omissions, such as:

- Detailed studies of protected species (badgers, bats, dormice, slow worms, brown hares, birds).
- Evaluation of high-value habitats and wildlife within and around the site.
- Risk of significant negative impacts on biodiversity, particularly bats, as indicated by limited reference to recent research (including international findings).

No assessment of:

• Detrimental effects of solar farms on sward composition beneath arrays over 50 years.

• Noise levels (e.g., 80dB) on biodiversity and the affected residents.

• Effect of the Electromagnetic frequency on all wildlife and the residents.

• No baseline to make accurate assessments on noise.

Impact: The lack of thorough assessments introduces unacceptable risks to local wildlife and habitats, contradicting biodiversity conservation principles.

Policy 58: Historic Environment Conservation

Key Concerns:

• Insufficient details on how the Scheduled Ancient Monument (SAM) would be

visually and contextually impacted by the substation.

• No archaeological surveys undertaken as requested by Archaeological Officer

• lack of understanding of the historical value of the site and immediate surrounding area

• No mitigation plan for potential hydrological changes across the site.

Impact: Without addressing these issues, the proposal risks degrading the integrity of nearby historical assets, undermining conservation goals.

Policy 67: Flood Risk

Key Concerns:

The provided information is both inadequate and incorrect regarding:

• Surface water flooding risk due to destruction of the existing field drains across the farm by the construction and pile driving in the panel supports. Existing agricultural drainage systems will be compromised or destroyed by construction and deconstruction.

• The presence and function of other water features (e.g., ditches, field drainage systems and temporary holding ponds) on this site has been dismissed.

Impact: Failure to accurately assess flood risks could result in unanticipated flooding, compromising both the development and surrounding land including the railway embankment.

Policy 52: Green Infrastructure

Key Concerns:

• No detailed assessment of the development's impact on PROW users.

Lack of information regarding:

• Impacts on the bridleway and footpaths during construction and trenching.

• Proper photographic documentation of impact upon existing footpaths/bridleways. Photographs provided by the applicant on PROWS are considered misleading stating no impact as PROW some of which appear unrelated to the site at all.

• No detail on noise impact on users and residents.

Impact: Ignoring these factors could lead to significant disruption of green infrastructure, undermining its accessibility, utility and amenity for the public.

Closing Statement:

The application continues to fail, or align with, the WCC policy framework due to incomplete, incorrect, or absent assessments across critical areas of landscape impact, biodiversity, historic conservation, flood risk, safety and construction, and green infrastructure. These deficiencies introduce significant risks to the environment, heritage, and public amenity, warranting refusal under the cited policies.

EPC argue for a strategic, balanced approach to renewable energy development that prioritises sustainable site selection without compromising landscape, biodiversity, ecology and agricultural integrity. EPC urge the rejection of this specific proposal, citing its numerous inadequacies and misalignment with local and national priorities.

Any solar site should be considered and looked at as whole being for the next 50 years and their impact not just for the immediate timescale of the application. These are long-term projects which will change any landscape on a permanent basis and should be carefully considered in relation to the permanency of damage to landscape, environment and ecology. The technology and different more efficient methods of renewable energy are changing and improving the whole time and will make these large-scale sites redundant in probably less than 5 years.

EASTERTON PARISH COUNCIL

03/12/24