

**Potterne Solar Action Group - Response to revised information
submitted to application PL/2023/10332 Potterne Park Solar**

Dear Mr. James, Case Officer,

We appreciate the opportunity to comment on the revised submission for the above application.

None of the revised documents submitted by the applicant in response to LPA questions (your email to applicant 02/04/24) satisfy the issues raised by our group, and others, lodged as part of the first consultation process.

In fact, the manner in which this request for more information has been met by the applicant is another example of their poor professional conduct. Your lengthy set of questions has been met by a set of haphazard resubmissions of documents, diagrams and random appeal notices with no attempt to summarise where answers to your questions can be found. This is a multimillion-pound investment that will disrupt the lives of many local residents, and scar the landscape around our villages forever, and the applicant is clearly not of a standard that provides any confidence that they could pull this implementation off. They have had 2 chances now to provide a credible submission and have failed on both counts.

Regarding the specifics:

1) Landscape Issues – Our community is so concerned about the visual impact of this vast site on our countryside that we commissioned our own critique of the applicant's Landscape and Visual Appraisal (LVA) Document. This review can be found under comment WC-24-02-293862. This review points to the under-reporting of sensitivity of the landscape (4.13 – 4.22). Indeed, the Landscape Officer was clear in his EIA response under PL/2023/10198, that **a full LVIA will be required to support this application**. The applicant has provided only an abbreviated form of LVIA in submitting an LVA. The applicant has not taken the opportunity to redress this, even when the number of substantial comments made by parish councils, our action group and the general public, clearly indicates that this is a major issue. **The applicant is not compliant of the Landscape Officer's request** and what has been submitted (the LVA) is under-reporting the landscape implications.

2) Ecology Issues – The second area of major concern to the community is ecology. The applicant is ignoring the delicate ecosystem that exists from the ancient woodlands to the south of the site (Folly Wood, West Wood and Parham Wood), through Potterne Park and up to Potterne Woods, Potterne Field and Drews Pond to the North. In fact, *The Arboricultural Impact Assessment* states that 'there is no ancient woodland at or adjoining the site!' This is an astonishing misrepresentation of environment! These fields are important commuting and foraging grounds for several protected species and other wildlife and will be severely disrupted by this application. This has been pointed out in several 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). The base line data for ecology has not been updated. **There is no re-statement of the base line assessment for bats requested by the Ecology Officer Elizabeth Burrows and no statement of Biodiversity Net Gain also requested by Elizabeth Burrows. The applicant is therefore not compliant of the Ecology Officers requests.**

3) Agriculture – There is no Agricultural Assessors report as requested by yourself, and no soil analysis report. The applicant is therefore not compliant with the Case Officer’s requests. As shown in section 3.4 of Potterne Parish Council’s comments (WC-24-02-293920) this land produces above average yields for winter wheat and grass when farmed appropriately and the drainage system properly maintained. This is good quality farmland which should not be surrendered when we have a mounting food security crisis, and the land is a key component of supporting local wildlife.

4) Access – The newly submitted CTMP does not address the issues raised on access by many objectors. See section 5 of Potterne Parish Council’s comments (WC-24-02-293920) in particular. It was pointed out in PPC’s report that vehicle movements are understated. The revised numbers in the new CTMP are still understated at 245 deliveries in total, as opposed to our view of 902 deliveries – see paper submitted separately by Luke Wilson, logistics engineer with the Army.

The justification for Hydrock's total construction traffic vehicle movements are taken from a “similar Solar Farm development in Uttoxeter Aston House Farm, Derbyshire Dales (Planning Ref: 14/00450/FUL)”. This solar farm is half the size, how can it be similar? The data remains inaccurate, not relevant to Potterne Park Farm and has clearly been cut and pasted from other applications - section 7.4.1 of the CTMP quotes Kenley House Farm for example. **None of this information can be trusted.**

This blatant re-use of information from other applications and what seems the use of other professional’s material is surely bordering on plagiarism and cannot possibly be used as submissible fact.

5) Glint and Glare – The conclusions of this desked based study are insufficient and at odds with the reality on the ground. It is ludicrous to suggest that Forest Farm, that is 170m away from a vast 200-acre solar farm in an elevated position, will have “low impact”, and that the West Wood property, which is higher and looks down on the fields, has “no impact”! The proposed additional screening of new plantings won’t be effective for at least 10 years and won’t be mature for another 20 years. Plus, this will only be effective in summer when leaves are on trees. We would also challenge the assumption there would be no glint and glare from the receptors to the North as properties currently experience glint from the railway, so stanchions will be subject to some reflection. The other properties that are dismissed to the south seem to be discarded due to a technicality of the amount of time during the day they will be exposed, and the study has completely failed to include Hillcroft House, 5 Easterton Sands – one of the closest houses to the south with a prominent view of the valley. The desk top survey has used Google maps as their available imagery during summer only. The situation would be markedly different in winter.

We point out also that the study fails to take into account two red light signals along the railway line and the 2 essential whistle stops before the pedestrian crossing (across the railway line) from Easterton to Potterne.

6) Technical Details - we note that **the applicant was explicitly asked to provide clarification regarding “the solar generating power of the panels”** (your email 2nd April 2024). **As far as we can see none of the new documentation addresses this request.** This is important, as we suspect the solar farm to be oversized relative to the 50MW inverter/export capacity with excessive overplanting of panels - which is in conflict with the NPS guidance given in EN-3. Indeed, Stark themselves have changed the stated size of PPF on their website from 50MW to 70MW (February 2024) and now back to 50MW in recent months. Is this incompetence, or obfuscation, or both? Either way it points again to the Applicant acting in a totally unprofessional manner.

None of the revised information provided changes our view **that this proposal is not in line with current government strategy** – see Ashley Wilson’s technical report on the grid implications of PPF (see comment WC-24-01-291543). It is our view that Stark Energy has a legacy agreement with the DNO and, therefore, the **LPA should be rejecting the proposal in order to align planning decisions with the 2023 BEIS/Ofgem Connections Action Plan – ie. to free up capacity for more viable projects which will meet new Government aims.**

7) Other factors – We note the comments made by the **Archeological Officer and the Drainage Officer who state that their questions have not been answered**, and the **comments from the British Horse Society that the bridleway will be unusable** as a consequence of the new planting plans – which of course has legal implications. **Also a PRoW Management Plan was requested and this has not been provided.**

Additionally, 2 random appeal notices have been submitted by the applicant with no explanation. We will save you the laborious task of reading examples of planning applications that have been refused by resisting the temptation to upload similar irrelevant reports.

What is relevant however is that in the 1988 and 1992 previous owners of Potterne Park Farm were refused full planning permission on access grounds for semi-industrial developments – Applications K/19107 and K/11792. In our view these do set precedent – solar can hardly be classed as “light industrial”.

This resubmission by Lighthouse / Stark energy is another example of the applicant not following due process. Many of the comments from the public and parish councils have pointed to the inaccuracies and error strewn nature of the original submission. **The applicant has not taken the opportunity to right those wrongs and provide a coherent case.** How the *Design and Access Statement* submitted by Lighthouse remains the definitive document of the proposal is totally baffling. It has not even been updated to address your questions or correct the numerous errors contained within.

In your email requesting a full set of information from the applicant you stated that “if the amendments do not satisfy the concerns raised above then the application would also proceed to a refusal”. The amendments clearly do not! Indeed, it is difficult to find examples as to where any of your questions have been satisfactorily answered.

Steve Holt
Potterne Solar Action Group