

PL/2023/10332 - Land South of Potterne Park Farm, Potterne SN10 5QT

Comments from Potterne Parish Council – 06/12/2024

It is a matter of public record that in April 2024 the Applicant was told "*the application will need significant amendment to be deemed acceptable*" and was given an unambiguous ultimatum by the Planning Officer that unless the numerous concerns raised by Wiltshire Council, consultees, local residents and Parish Councils were satisfied in one comprehensive suite of documents the application would be refused. Such ultimatum would obviously not have been necessary had the Applicant complied with the requirement to submit a comprehensive application in the first place.

The Planning Officer listed such concerns in his email of April 2024 containing the ultimatum. Potterne Parish Council has analysed the Applicant's response (if any) to such concerns in order to identify matters that are still outstanding/not covered and their likely impact, see **Section 2 below**. The paucity of information revealed by this exercise (even after all this time, **NONE of the 43 concerns listed have been fully answered by the Applicant**), together with the errors omissions and misleading statements in the documents, proves beyond all reasonable doubt the Applicant's failure to comply with the Planning Officer's request, and for that reason alone the Application should, in our view, be refused without any further delay, failing which it may well give rise to grounds for judicial review.

Notwithstanding the above, information is still being **allowed to be drip-fed** into Wiltshire Council - **eight months after** the ultimatum and **almost a year since** the proposal began. In other words the ultimatum is being ignored by the Applicant and (it would appear) Wiltshire Council alike.

This state of affairs is having the following consequences. In our view none of them is for the public good:

1. It is lowering general respect for the planning process by raising doubts about its impartiality and fairness. This huge solar farm has become a preoccupation of the various communities it would adversely affect (see for example the unprecedented number as at 5 December 2024 of 350 objections - representing 97.8% - filed on the portal), not to mention every one of the surrounding Parish Councils and various institutions, including the Highways Department), and most of them are closely monitoring the application's progress through Planning: it has to be said that there is a growing perception

of a two-tier system where the failure to submit a properly-completed application complying fully with national information requirements has not led to what should have been an automatic refusal.

2. It suggests that the Applicant is totally indifferent, bordering on arrogant, towards both the planning process as a whole and also to the communities that will be affected by this deeply unpopular and inappropriate proposal. The 6 new documents lodged in October 2024 comprise the second set of information submitted by the Applicant (the first set consisted of 20 new documents last June). Each time more information is drip-fed into Wiltshire Council it creates additional work and stress for the numerous people who have to check that information: objectors and councillors (all of whom are unpaid and have to give up their free-time) and members of the Planning Department (at the ultimate expense of the ratepayers). As with the June documents, we do not feel that any of this latest information adds anything to the case for approval: quite the contrary - see **Section 1 below**, which also includes some new comments (paras 4-7 incl).
3. Whether or not by design, it concentrates attention on minor, peripheral aspects of the proposal and tends to direct the focus away from the core issues and principles which were all set out in detail in our original objection notice (comment WC-24-02-293920). We draw them to your attention again.
4. Despite the fact that the Applicant claims to be an international solar business whose work involves all aspects of project development, the casual, careless and inefficient way it has handled the planning application process has raised serious doubts about the level of care and professionalism it would apply to the construction, maintenance and ultimate decommissioning of the solar farm and any conditions imposed should permission be granted.

Potterne Parish Council reaffirms its two previous Objection Notices and continues UNANIMOUSLY AND STRONGLY to object to this Application.

Section 1 – Comments on recent documents submitted October 2024, and other fresh points.

1. **Landscape sensitivity** – the Applicant has updated the LVA to take into the account the proposed solar farm at Blounts Court. The new CZTV fig LA 12-1 clearly shows the devastation on visibility of these juxtaposed sites – they will be a major blot on the landscape. The Applicant then sets great store by the fact that Blounts Court will be decommissioned 20 years before the end of Potterne Park Farm, obviously not having checked the Blounts Court application which is for 40 years, not 30 as assumed. The new LVA (still not a full LVIA as requested by the landscape officer) still underscores the landscape due to desktop classifications of this being Rolling Clay Lowland. It continues to ignore context that this is not a hidden Site and the backdrop of the valley is Greensand Vale. The Site is not compliant with Wiltshire Council Renewable Energy Study (March 2023) guidelines – the Site falls on the boundary of Landscape Sensitivity areas 1 and 2 and is not suitable for large scale solar farms as laid out in figure 3.5 of that document. This was also set out in the critique of this LVA in the Potterne Solar Action Group comment WC-24-02-293862. The new version submitted ignores these points.

The Applicant has also ignored the request to coordinate the Glint and Glare study with the LVIA for the benefit of PRow users, saying dismissively that it was “produced by others”. The proposed series of hedgerow and tree planting points will never screen off this Site as it is on an elevated slope. The 4 new photographs are irrelevant – one even points the wrong way - away from the Site! A more realistic set of photographs can be seen in the montage submitted by John Peak (comment WC-24-02-294366).

2. Ecology - We fully endorse the comments made on this subject by Jo Darlington (WC-24-11-318244). (Ms Darlington is a qualified Chartered Surveyor with extensive experience in writing and coordinating EIAs). We also refer to the comments made by the Landowners of the Site themselves (set out in section 3.1 of our first objection notice (comment WC-24-02-293920) concerning the ecology on the Site, and we note that in 2018 all the land at Potterne Park Farm was in a Higher Landscape Scheme (as then was) "*such is the value that Natural England have placed on the farmed landscape here*". The aims of such Scheme included wildlife conservation, landscape quality and character and natural resource protection, and involved the payment of a grant.

3. Noise - There is no data referenced or accompanying the *Briefing Note: Noise from Potterne Solar Farm*, so it is difficult to assess the conclusions. There is no baseline for comparator purposes and no graphs/maps showing decibel levels. There are 11 inverters referenced when other documents show 16. The substation is mentioned but there is no data from which to draw any conclusions. Only Forest Farm is referenced when there are other residential properties nearby, and no consideration at all given to the PRow's

and bridleways. In our opinion it is impossible to determine any basis of strategic infrastructure on such inadequate and clearly inaccurate data.

4. CCTV/ floodlights. The plans show CCTV poles at 5m high across the site including boundary fences, including on PRow. We would assume that as there will be numerous rights of way the Data Protection Act would apply to these recordings but couldn't find any reference to a review of how this information would be managed. In our opinion, this raises a privacy issue for residents and users as there is no information on what will be under CCTV and why. We can find no evidence of where floodlights would be located which has implications for light pollution in the valley.

5. Excavations. The Construction Transport Management Plan states that cables will be trenched at 1.2m and 0.6m across the site, and it would mean extensive trenching across the site, likely many km. In the 'land drain locations Appendix B' document, the land drains are shown at 300mm. It also states 'extensive buried drains some of which are clay and vulnerable to breakage'. Needless to say this represents a huge risk to the drainage management of the site, for which we can find no mitigation in the Flood Risk Plan.

6. Substation Design. The substation design makes no reference to concrete plinths/ foundations; this is clearly wrong, noting the ground conditions referenced elsewhere. Furthermore, the inverter design does include concrete plinths. These inverters appear to be spread across the site at the ends of solar arrays. The designs omit this extensive use of concrete across the site and, needless to say, there is no mention of the significant in load of concrete in the CTMP!

7. Battery Storage. The design and access statement has not been updated and still includes reference to a battery storage area. This is not included in the designs.

We have tried to make sense of these designs, but there are now too many layers of conflicting documents to be clear what the precise nature of the design actually is. This means the construction method statements cannot be correct and require significant revision to accurately estimate the duration of construction and the impact on the local area.

Section 2 – Analysis of Applicant’s response to the Planning Officer’s questions of April 2024

	Issues in JJ’s email of 02.04.24	Applicant’s response	Full response Yes/No	Issues not covered/outstanding issues	Impact(s)
1.	Archaeology – issues and requirement for further information have already been highlighted to you: I acknowledge that you are disputing this matter under separate complaints procedure.	Written Statement of Investigation – says geo-physical survey only. 234 trenches to be pre-construction not pre-approval due to “considerable impact on environment” ... “ecologically inappropriate, disturbing habitats” ... “generate noise and disturbance”... “destroy complex of existing drains”.	No	Archaeology officer’s objection not met.	The site has “Historic significance” ... “beyond the likelihood that it was the location of a former lodge as part of the Bishop of Salisbury’s Park”. See West Lavington Parish Councils objection WC-24-02-293783.
2.	Landscape – is maintaining a holding objection to the scheme due to insufficient information submitted with the application, details were highlighted in EIA response under PL/2023/101098. The points raised in their comments will need to be addressed as part of any future re-submission.	LVA updated to take into account cumulative effect of Blounts Court Farm Solar planning application.	No	Applicant continues to under value the landscape. Site not compliant with Wiltshire Council Renewable Energy Study (March 2023) guidelines – the site falls on the boundary of Landscape Sensitivity areas 1 and 2 and is not suitable for large scale solar farms. Applicant has not done a full LVIA as requested by the Landscape Officer.	A critique of the LVA was commissioned by Potterne Solar Action Group comment WC-24-02-293862 showing the applicant is under valuing the landscape. This is not a hidden site, visible from everywhere in the valley and cannot realistically be screened as it is on a slope.
3.	Glint & Glare issues – Landscape officer highlights that whilst there is a glint and glare study it only deals with visual amenity from residential houses and not Public Rights of Way. There needs to be coordination between LVIA and Glint & Glare to agree viewpoints that would be used to assess visual amenity impact on active travel corridors (Footpaths/bridleways/etc) especially on PROW that run either close by or through the SF.	The applicant has ignored the request to coordinate the Glint and Glare study with the LVIA for the benefit of PROW users saying it was “produced by others”.	No	Applicant does not appreciate the importance of the Bridleways and PROWs to the local area. These are well used routes for riders and walkers.	

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4.	Network Rail – has identified that the reflective material of solar panels could have an impact on the line of sight of train drivers and the potential for glare or reflection of light from the panels that may impact upon the signalling <u>must</u> be eliminated.	The Glint and Glare 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.	No	Not compliant with case officer's request	
5.	These issues are reflected within the Glint & Glare report that highlights detailed modelling will need to be conducted a part of the final glint and glare assessment as required as part of the high level assessment for the dwelling receptors, railway assessment and Airfield operations. Based on the fact that the site is crossed by several rights of way it is considered that a high level assessment would likely be required for the impacts on the PROW of this area as well. This information would need to be submitted as part of this application otherwise insufficient information has been provided to allow for a fully informed decision to be reached.	This failure to take into account the red lights along the railway line has not been addressed by the applicant.	No	Not compliant with case officer's request.	
6.	PROW Team - have identified the need for submitting an Outline Public Rights of Way Management Plan in addition to the requested mitigation, enhancements and contributions towards local rights of way infrastructure within the area. These points will need to be addressed within this application.	Not addressed.	No	There is no amendment that one of PROWs is a footpath which the Applicant has wrongly deemed would be suitable for transport management, nor are any of the DMMOs identified.	Applicant does not appreciate the importance of the Bridleways and PROWs to the local area. These are well used routes for riders and walkers.
7.	Council Arboriculture Officer - has identified the application has insufficient information regarding the impact on trees and hedgerows within the vicinity of the site and further information to ensure that sufficient consideration has been given to protect the	No response.	No		

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	trees etc An Arboricultural Impact Assessment including Method Statement, Tree Constraints Plan etc prepared by a qualified Arboriculturalist and in accordance with BS5837:2012 is required prior to determination, to ascertain the impact and the feasibility of the development in relation to the trees on and off site.				
8.	<p>Highways Safety - strong concerns have been raised at the potential impact on highway safety. Comments received from the highway team ask for 'more information in specific relation to the vehicle movements, sizes and management. It is apparent that the solar farm under 21/06100, though comparable in size and to some extent location attracts a much greater number of vehicle movements and I am interested to find out from the applicant why they believe their site does not mirror this demand. I invite the application to consider the information provided under the application 21/06100 for reference.</p> <p>The following information is required in support of the application:</p> <ul style="list-style-type: none"> • Phasing of development, at each stage what size of vehicle, number, route taken and number of days/weeks associated with each phase • More specific detail of how large HGV traffic will be managed through sensitive areas (eg school times, road narrowing through the village). 	A second CTMP was submitted on 19 Jun 23. A swept path analysis of HGV movement at the junction of Potterne Wick and the A360 was also provided.	No	The vehicle movement data has previously been submitted by the Applicant in support of a 32Ha farm, a 79Ha farm and a 45Ha farm in various parts of the country. The applicant has made no attempt to add any local context to these and they do not represent the reality of constructing such a massive project. There remains no detail on the phasing of development and no additional detail on HGV management through sensitive areas. Furthermore, the information provided (Appendix 2 to the CTMP) identifies significant distances where there are no passing places for HGVs or other vehicles.	<p>This is an industry copy and paste report plagiarised from other applications. The reality is that residents will likely be exposed to a significant increase in traffic, especially at peak times with no management.</p> <p>There remains a significant concern that management of HGVs on this route have not been considered. Particularly passing places and interaction with pedestrians.</p>

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9.	Highways - The highway officer is minded to accept the physical mitigation proposed but on further research is aware that more detail is required in regards to the numbers and movements and traffic impact. As part of that assessment a tracking drawing of the large HGV manoeuvre off the A360 should also be included .	This was provided as a Swept Path Analysis on 19 Jun 24 as both a stand-alone document and Appendix 2 to the CTMP (dated 19 Jun).	No	<p>The CTMP has been copied from at least two other applications of varying size and in no way represents reality. For example, no daily traffic movements of worker to site have been included.</p> <p>The swept path analysis only considers around 100m from the junction with the A360. The provided document does not account for HGVs passing each other as the traces overlap.</p> <p>The swept path analysis (Appendix 2 to the CTMP) demonstrates that the road from Potterne Wick to PPF is in the majority a single track with no place for two HGVs to pass.</p>	<p>The plagiarised nature of this report completely undermines it as a representation of reality.</p> <p>The swept path analysis identifies that there is not space for two HGVs to pass. This will lead to increased traffic and delays as well as damage to the edge of the highway.</p> <p>Potterne Wick has no path and so this is likely to put pedestrians in direct contact with significant number of HGVs. There is no proposed mitigation.</p>
10.	Highways - Details of the specific signing for any vehicles associated with the development will be required .	The applicant resubmitted the CTMP on 19 Jun 24. There are no further details.	No	There is no evidence that HGVs will not approach PPF travelling N on the A360. This will force them to turn right across the traffic uphill on the A360. Without signage this presents a significant risk to traffic. The Landowners themselves acknowledged that the junction was " <i>dangerous and totally suitable</i> " for heavy use, and there would be accidents (see their comments on application 17/10190FUL).	There have been a number of accidents on this junction. Without effective signage traffic management it is likely that the risk on this corner will be increased.
11.	Highways – there is a legitimate concern about the effect of volume and size of traffic on aesthetic and functionality of the highway.	The applicant resubmitted the CTMP on 19 Jun 24. No further details have been provided.	No	The plagiarised nature of this report completely undermines it as a representation of reality. Without realistic vehicle movement data this cannot be ascertained.	Appendix 2 to the CTMP (Swept Path Analysis) clearly shows that these vehicles will have to drive to the limit of the paved surface in many areas. It is likely that

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					they will deviate from the paved areas, thus damaging the verge. Furthermore, these vehicles will leave no space for pedestrians. The management of the interaction between HGVs and pedestrians has not been considered.
12.	Highways - There appears to be an increase in rural areas of carriageway soiled at the moment and concern expressed with this location and how it will cope with the scale and volume of traffic without interventions.	The CTMP submitted on 19 Jun 23 states that vehicle cleaning will be carried out at a dedicated wheel cleaning station set up for the purpose.	No	There is no space allocated in the HGV holding area for vehicle cleaning. Figure 4.7 makes reference to wheel cleaning in the 'typical construction compound' but the location of this is not detailed in Appendix C.	The plans for reducing soiling appear incomplete and so it is not possible to ascertain whether they are credible.
13.	Highways – Construction Management Plan at para 4.8.2 states a small bridge is present along the route however there are no obvious weight restrictions along the unclassified road therefore this will need to be reviewed.	The CTMP submitted on 19 Jun 24 identifies this but no further analysis has been done.	No	Para 4.8.2 of the CTMP states that a temporary over bridge could be used. The proposed bridge example is for private use only.	The construction of an over bridge that is not suitable for the public will close the route for the duration of construction.
14.	Highways - Existing Small Bridge will be subject to a pre-commencement survey to establish if it will be fit for HGV movements. If constraints identified then temporary bridging solutions are available. This will need to be considered as part of the current application so that we can understand the potential for impact on protected species and on the water course and any associated flooding issues.	The CTMP submitted on 19 Jun 24 identifies this but no further analysis has been done.	No	No further analysis of this bridge has been carried out. There is no evidence that analysis on the impact on the water course has been carried out.	The impact on this bridge and the route is unknown as suitable detail has not been provided.

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15.	Network Rail – have identified that drainage details shall not be implemented in any location that could impact on the stability of Network Rail's property/infrastructure. Storm /surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage systems are not to be compromised by any work. Suitable drainage or other works must be provided and maintained by the Developer to prevent water flows or run off. Their comments need to be taken into consideration.	No acknowledgement that the comments have been taken into consideration.	No		
16.	Flooding – The FRA require the sites infrastructure (buildings) should be mounted on plinths above a new permeable gravel base such as that shown in Fig 6. However, this does not correspond with the limited submitted details for the on site infrastructure.	New FRA submitted has omitted this completely.	No	So, if this has been removed from the FRA are we to assume that this is now not going to happen? If not, how has the applicant come to this decision?	
17.	Change of Land Cover - Gravelled Surface the proposed establishment of a gravelled surface across the portion of the site in which associate infrastructure structures are to be located will represent a change in land cover, with the current land being covered with a layer of gravel. Temporary compound and access areas should be reinstated as grass following completion where they are not required for regular maintenance access. It is not clear from the submitted details the extent of such works, including depth of gravel layers etc and so therefore it is not clear what is actually proposed. There is currently insufficient information on this matter.	5.2.2 is the same in both FRA's no detail in the new FRA.	No		

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18.	Ecologist – comments received from the Council's ecologist object to the proposed scheme identifying that further information is required, please refer to their detailed comments, contained within the attached correspondence.	No response.	No		WC Ecologist relies on/refers to document dates which are incorrect: LEMP (Tir Collective 23.01.2020 twice and Proposed Block Plan "04.11.24" post-dates her report).
19.	The following points will also need to be addressed as part of any resubmission: 1. Panel specification – panels should be of non-reflective material and we require clarification on the solar generating power of the panels	No response.	No		
20.	2. There is discrepancy with the submitted details in that the side section and the front elevation of the panels provided have discrepancy (800mm to 1000mm from the front edge to ground)	Document: General Details and Indicative Sections submitted 19 Jun.	No	This discrepancy remains and the document has not been updated since 24 Nov 23.	
21.	3. There is a lack of detail with the following, we need all building elevations, plans, colour finishes etc, cross section through tracks, grid connection and line (trench) of wire connect (clarification of lines running across PROWs); details of fencing, CCTV and poles	No response.	No	No further detail provided.	
22.	a. We have details of the Details of inverter but plan refers to a transformer also	19 Jun- 'Proposed substation details and layout. 21 Oct Noise Assessment The only mention of this is in the DAS in 4.1.2 there is no detail other than the statement that there will be one.	No	This plan does not provide details of the transformer or inverter. The plan submitted is marked 'Indicative'. The plan shows a single transformer whereas the Noise Assessment has included two transformers. The second transformer is missing from the plan.	The designs for the substation and the inverters are incomplete and contradictory. Without this detail it is impossible to measure the amount of ground works required, or to understand the total impact of the project.

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				There are no locations for inverters given in the overall plans (Document Proposed Site Block Plan), however in the document 'General Details Sections' the plan calls for inverters to be mounted on what appears to be concrete plinths. This contradicts the 'Design and Access Statement which appears to show them mounted on the solar arrays. Ignored	
23.	b. DAS suggests grid connection/substation will be in the northern section of the site	Nil - the DAS has not been updated. Not addressed the only mention is in the original DAS. No further comment or information from the applicant.	No	This seems to have just been ignored.	
24.	c. DAS (4.3.1) states that there will be battery storage units (standard containers are 40ft in length), no detail on these units to assess these	Nil - the DAS has not been updated. The original DAS has not been updated therefore there is no submitted response from the applicant.	No	The confusion over whether battery storage is included remains. This has implications for broader design of the area, notably whether larger areas of ground improvement are required. How can a measured decision be made when information has not been supplied?	This could have significant impact on the CTMP as well as flood management plans.
25.	d. Fencing seems to suggest to be 240mm tail on some details and 2000m on others	Nil, this confusion remains.	No		

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26.	Customer cabins - Clarification on whether there are any customer cabins, battery storage buildings, spare parts cabin etc, and welfare structures? If yes to any/all of these, scaled plans and details will be required (inc plinths etc that they may be sat on).	An updated CTMP and 'substation' design was submitted. There is no reference to the requirement for concrete plinths etc. In this plan these structures are laid on the ground.	No	The lack of concrete foundations for any structure is a glaring omission in the CTMP and design plans.	
27.	Reference to drawing where area is outlined in yellow – on the above extract, it is not clear what is going on here please clarify	No response.	No		
28.	Substation - Where is the proposed 'substation' (layout proposed to be?)	No response.	No		
29.	Flood lighting – flood light CCTV columns (no details provided).	An updated 'indicative sections' plan was submitted on 19 Jun 24. This includes design for CCTV poles but not floodlights. Within the 'substation design' there is reference to CCTV poles in the 'birds eye view' but these are omitted from the cross section design.	No	The need for flood lights has not been fully explored. Furthermore, the layout of CCTV cameras across the site may give rise to privacy issues that have not been addressed.	There will be 5m poles throughout the site with CCTV cameras; many of these will be adjacent to public rights of way. At 5m high they will be highly visible.
30.	Underground cabling – underground cabling from each inverter to the transformed (is this the substation?)	Updated CTMP dated 19 Jun and updated 'indicative sections'	No	There is no design for this; it is not clear how this will be done. However, in the CTMP it states 'Trenching comprises a layout of main trenches between inverters and switch enclosures circa 120.00cm deep with secondary trenches from each panel row and other isolated areas circa 60.0cm deep. This is significant excavation of many km of trenches which in many places will intersect the delicate (clay) pipes that form the land drain.	It is clear that extensive excavations will be required throughout the site. In the document 'Land Drain Locations' the typical land drain cross section gives an excavation depth of 300mm. This means that the extensive excavation required for cabling will intercept these land drains. There appears to be no management plan for this.

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31.	<p>What is the Associated Infrastructure?</p> <p>Para 4.4.1 of the DAS states – “The scheme would also incorporate the following ancillary elements:</p> <ul style="list-style-type: none"> a. Stock- proof fencing b. CCTV around the perimeter of the site c. A stone track running through the site d. Underground cables e. Inverter Units f. A customer sub-station and associated small scale plant g. A range of ecological enhancement measures <p>However, there is no detail of battery storage units or of the flood lights any other proposed lighting</p>	No response.	No		
32.	<p>Where is the Agricultural Assessors report?</p> <p>[Agricultural Land Survey (ALS) by Land Research Associates</p>	No response.	No		

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33.	Further identified discrepancies: <ul style="list-style-type: none"> Para 1.1.2 of DAS states 218 acres (88 hectares) Application form states 79.75 hectares The LEMP states 79.75 hectares and tree survey The archaeological desk based survey suggest a site area of 88.2 hectares Please clarify what is the actual area?	Landscape & Visual Appraisal – 18.10.24.	No	LEMP paras 1.1.1 and 7.1.1 still stating 79.75 hectares.	
34.	Please clarify the following points: <ol style="list-style-type: none"> The application form states 'no foul disposal required', however, the compound plan includes the WPD control room with WC and a sealed cesspool. If these items are on site then there is clear discrepancy between the application form and eh plans submitted 	Not answered.	No	Lack of detail.	
35.	<ol style="list-style-type: none"> The DAS suggests that there is no designated heritage assets within or adjoin the site. Heritage assets range from sites and buildings of local historic value to those of the highest significance. In this instance there are clear elements of archaeological interest adjoining the site and likely across it. 	Not answered	No	See earlier comments in 1. above	

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36.	iii. DAS para 3.4.1 4) states that the scheme 'is available for the planned 40 years duration' application is for 50 years.	Not answered. Also there are references to the substation application being for 99 years. Either way 40, 50 or 99 years cannot be seen as temporary.	No	The DAS is a really poor quality document. These errors quoted here are a subset of a multitude of inconsistencies in this error riddled document.	How the DASS can remain the definitive document in this application is a disgrace.
37.	iv. DAS para 3.4.1 6) states that scheme is 'distanced from nearby public rights of way'; this is clearly incorrect as several cross the site	DAS not updated.	No		
38.	v. DAS para 3.4.1 7) the site is overlooked by several residential properties. This is an understatement.	Not updated.	No	The applicant has shown no regard for the local residents from the start. There has been no proper engagement and no recognition of the issues registered.	The local community has no faith in the applicant.
39.	vi. DAS para 3.4.1 10) states that the development is 'utilising existing grid infrastructure'. Where?	Not answered.	No	We are not sure what this refers to.	
40.	vii. DAS para 4.4.3 states that no security lights, however, substation plan clearly includes pole mounted flood lighting.	Not updated.	No	This is a very significant point as the lack of light pollution in the valley is one of its major attractions at night.	

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41.	viii. The 'inverters' shown in the DAS differ from that shown on the site layout. Requires clarification.	Not clarified.	No		
42.	ix. Para 4.5.4 states access for construction phase would take place over 56 weeks (approx. 14 months) which contradicts the transport assessment	Not clarified.	No	All the vehicle movement numbers have been grossly under quoted and plagiarised and cut and pasted from other sources - See Luke Wilson's comment WC-24-08-308163.	This is clearly a question of misleading the public and the planning officers.
43.	x. The DAS is missing two appendices (A and C)	Not provided.	No		The least of our worries!