WSBRC | Wiltshire & Swindon Biological Records Centre

Wiltshire Wildlife Trust | The Wildlife Trusts

PLANNING APPLICATION OBJECTION PL/2023/10332

Land South of Potterne Park Farm, nr Potterne, Devizes, Wilts, SN10 5QT 12th February 2024

Dear Mr James,

On behalf of both Wiltshire Wildlife Trust and the Wiltshire and Swindon Biological Records Centre (WSBRC), I am writing to object to this planning application.

While we support the general principle of renewable energy, on this occasion we object to this particular proposal due to the potential impacts on rare and protected species.

The WSBRC is the County's Local Environmental Record Centre (**LERC**) and custodian of the best available species, sites and habitats information available for Wiltshire & Swindon. A search of our data within 500m of the site produces 1,100 biological records of sightings and wildlife activity over a period from 1984 to 2023. These include 67 individual protected species (Appendix 1).

Bats

Verified data indicates two maternity roosts in close vicinity and three other roost sites nearby. We confirm records of of Barbastelle bat's (*Barbastella barbastellus*), Bechstein's (*Myotis bechsteinii*), Lesser horseshoe (*Rhinolophus hipposideros*) and Greater horseshoe (*Rhinolophus ferrumequinum*) bats - all listed on Annex II of the EU Habitats Directive and subject to a range of protective legislation.

We do not support the conclusions drawn in the Environmental Impact Assessment (EIA), which suggests that the site is not of particular importance to Annex II species. Barbastelle bats are one of the UK's rarest bat species and the woodlands around the area host one of only two known breeding sites in a building in the UK *and is therefore of national importance*. Radiotracking studies undertaken by the County Recorder indicate bats forage extensively over Potterne Park Farm and over the farmland located north of Potterne Wick/ south of Drews Pond Wood, Devizes.

We support and agree with the findings of Mr Gareth Harris (County Recorder) that this development will result in significant land use change within the Core Sustenance Zone (CSZ -the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony using the roost – in this case out to 6km from the roost sites). The proposed solar farm lies near the centre of this CSZ of five nearby roosts and impacts a large foraging area. The closest roost lies only 500m away and there is an important maternity roost within 1.5km. The development will result in the loss of high-quality organic foraging areas in close proximity to roost sites. We have detailed data and maps we can supply to the Council on a Confidential basis which more than adequately illustrates these points.

The survey carried out for the EIA is flawed in that it focussed on hedgerows and linear features, rather than on the fields that this development will impact and which are the key foraging habitat for Barbastelle bat and other bat species.

It is our opinion that bat survey results in the Devizes area, encompassing Potterne Wick, justify the implementation of a Bat Mitigation Strategy (similar to the Trowbridge Bat Mitigation Strategy, which applications within the Trowbridge area must comply with). We are greatly concerned that the absence of such a plan for the Devizes area will result in these vitally important populations not receiving the sufficient recognition and protection they require in law, and applications such as this do not give them adequate consideration.

Raptors

WSBRC data records 23 protected bird species listed on the Red List, under Section 41 and/or UK BAP using the area on/around the proposed site over many years from 1984 to 2023. Species include The Barn Owl (*Tyto alba*), Red Kite (*Milvus milvus*), Hobby (*Falco subbuteo)* and in addition three **confidential** bird species of even greater importance (additional information on these species should be sought from WSBRC and Wiltshire Ornithological Society).

How loss of such a large area of land may impact raptor hunting areas and access to prey species such as voles, mice and brown hare has not been considered in the EIA.

Brown Hare (Lepus europaeus)

We are also concerned that the proposed solar farm will adversely impact upon a UK BAP Priority Species that has been recorded around the site, the Brown hare which is listed under section 41 of the Natural Environment and Rural Communities Act 2006 for high conservation priority.

WSBRC records show Brown Hares have been frequently sighted in the fields around Potterne Park Farm since 1996.

As well as degradation of the grassland sward food source as a result of overshadowing by solar panels, WSBRC would also raise concerns about extensive fencing impeding the movement of Brown Hares through the site, a common concern with solar farm developments. In particular fencing has been known to cause the separation of adults from young, leading to young being lost or abandoned and starving to death.

Biodiversity Net Gain

It is disappointing that the EIA is only aiming for 10% BNG, given that Policy 89 in the pre-submission draft of the Wiltshire Council Local Plan (2020 – 2038) states that *"Development must achieve a minimum of 20% Biodiversity Net Gain..."*

Since a Biodiversity Gain Plan has not been submitted at the application stage, we are not confident that BNG can be achieved on-site and the mitigation hierarchy can be followed. It is very challenging to maintain high quality diverse grassland and wildflower meadows using sheep grazing, as the LEMP specifies.

Yours Sincerely

Mr J Isherwood

WSBRC Manager

e Joni@wsbrc.org

t 01380 736072 x253

Wiltshire & Swindon Biological Records Centre

Wiltshire Wildlife Trust

Appendix 1 – WSBRC Data Search results of the proposed site + 500m

Species	Common Name	Status
Coenonympha pamphilus	Small Heath	RLGB.Lr(NT), Sect.41, UKBAP
Cupido minimus	Small Blue	RLGB.Lr(NT), Sect.41, UKBAP
Hyacinthoides non-scripta	Bluebell	WCA8
Luzula sylvatica	Great Wood-rush	County
Tyto alba	Barn Owl	WCA1i
Blechnum spicant	Hard-fern	County
Hypericum androsaemum	Tutsan	County
Poecile palustris	Marsh Tit	BRed
Meles meles	Eurasian Badger	PBA
Carex pallescens	Pale Sedge	County
Erynnis tages	Dingy Skipper	RLGB.VU, Sect.41, UKBAP
Rhinolophus hipposideros	Lesser Horseshoe Bat	County, HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c
Lepus europaeus	Brown Hare	Sect.41, UKBAP
Bufo bufo	Common Toad	Sect.41, UKBAP
Myotis nattereri	Natterer's Bat	County, HabRegs2, HSD4, WCA5/9.4c
Vanellus vanellus	Lapwing	BRed, Sect.41, UKBAP
Pinus sylvestris	Scots Pine	NS-excludes
Buxus sempervirens	Box	NR-excludes, RLGB.DD
Euphorbia peplis	Purple Spurge	RLGB.EX, RLGB.RE
Lathyrus sylvestris	Narrow-leaved Everlasting-pea	County
Pluvialis apricaria	Golden Plover	BD1
Perdix perdix	Grey Partridge	BRed, Sect.41, UKBAP
Alauda arvensis	Skylark	BRed, Sect.41
Emberiza calandra	Corn Bunting	BRed
Emberiza citrinella	Yellowhammer	BRed, Sect.41, UKBAP
Passer domesticus	House Sparrow	BRed, Sect.41, UKBAP
Turdus iliacus	Redwing	WCA1i
Linaria cannabina	Linnet	BRed
Motacilla flava flavissima	Yellow Wagtail	BRed, Sect.41, UKBAP
Barbastella barbastellus	Western Barbastelle	County, HabRegs2, HSD2p, HSD4, RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
Eptesicus serotinus	Serotine	County, HabRegs2, HSD4, RLGB.VU, WCA5/9.4c
Myotis	Myotis Bat species	County, HabRegs2, HSD2p, HSD4, RLGB.CR, RLGB.DD, Sect.41, UKBAP, WCA5/
Myotis brandtii	Brandt's Bat	County, HabRegs2, HSD4, RLGB.DD, WCA5/9.4c
Myotis mystacinus	Whiskered Bat	County, HabRegs2, HSD4, RLGB.DD, WCA5/9.4c
Nyctalus noctula	Noctule Bat	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
Pipistrellus pipistrellus	Common Pipistrelle	County, HabRegs2, HSD4, WCA5/9.4c
Pipistrellus pygmaeus	Soprano Pipistrelle	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
Falco subbuteo	Hobby	WCA1i
Anthus trivialis	Tree Pipit	BRed, Sect.41, UKBAP
Emberiza schoeniclus	Reed Bunting	Sect.41, UKBAP
Turdus pilaris	Fieldfare	BRed, WCA1i
Turdus viscivorus	Mistle Thrush	BRed
Sturnus vulgaris	Starling	BRed
Pipistrellus pipistrellus	Pipistrelle	County, HabRegs2, HSD4, WCA5/9.4c

Plecotus	Long-eared Bat species	County, HabRegs2, HSD4, RLGB.EN, Sect.41, UKBAP, WCA5/9.4c
Rhinolophus ferrumequinum	Greater Horseshoe Bat	County, HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c
Muscicapa striata	Spotted Flycatcher	BRed, Sect.41, UKBAP
Myotis bechsteinii	Bechstein's Bat	County, HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4c
Plecotus auritus	Brown Long-eared Bat	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
Pipistrellus	Pipistrelle Bat species	County, HabRegs2, HSD4, RLGB.Lr(NT), Sect.41, UKBAP, WCA5/9.4c
Bromus racemosus	Smooth Brome	County
Micromys minutus	Harvest Mouse	RLGB.Lr(NT), Sect.41, UKBAP
Chiroptera	Bat	County, HabRegs2, HSD2p, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lr(NT),
Spergula arvensis	Corn Spurrey	RLGB.VU
Bromus commutatus	Meadow Brome	County
Cuculus canorus	Cuckoo	BRed, Sect.41, UKBAP
Fringilla montifringilla	Brambling	WCA1i
Rana temporaria	Common Frog	HSD5
Milvus milvus	Red Kite	BD1, WCA1i
Nyctalus	Nyctalus Bat species	County, HabRegs2, HSD4, RLGB.Lr(NT), Sect.41, UKBAP, WCA5/9.4c
Pipistrellus nathusii	Nathusius's Pipistrelle	County, HabRegs2, HSD4, RLGB.Lr(NT), WCA5/9.4c
Nyctalus leisleri	Leisler's Bat	County, HabRegs2, HSD4, RLGB.Lr(NT), WCA5/9.4c
Myotis daubentonii	Daubenton's Bat	County, HabRegs2, HSD4, WCA5/9.4c
Scolopax rusticola	Woodcock	BRed
Myotis mystacinus/brandtii	Whiskered/Brandt's Bat	County, HabRegs2, WCA5/9.4c
Zootoca vivipara	Common Lizard	Sect.41, UKBAP, WCA5/9.1k/l
Euplagia quadripunctaria	Jersey Tiger	HSD2p