The countryside charity
Wiltshire

For attn. Mr Jonathan James

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Dear Mr James

Planning References: PL/2023/10332 and 10198 - Land South of Potterne Park Farm, nr Potterne, Devizes, Wilts, SN10 5QT

Proposal

Installation of a solar farm comprising ground mounted solar PV panels with a generating capacity of up to 49.9 MW, including mounting system, permanent on-site grid connection hub, inverters, underground cabling, stock proof fence, CCTV, internal tracks and associated infrastructure, landscaping, biodiversity net gain and environmental enhancements for a temporary period of 50 years.

CPRE Wiltshire objects, in principle, to the entirety of the proposals, which have been considered by our committee.

Relevant Policies

The National and Wiltshire policies for consideration in determining the outcome of this application include:

1. [1]National Planning Policy (NPPF) 2023: 15 and 16

   [2]*The National Planning Policy Framework Para 160 (a) states that councils should provide a positive strategy for energy from renewable and low carbon sources, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts.)*

2. [3]Wiltshire Local Plan Policies: WLP Policies 4, 85, 86, 88, 89, 91 mirroring, updating or existing under

   Wiltshire Core Strategy 2015 (WCS) Policies (Wiltshire Local Plan Pre-Submission Draft 2020 – 2028 Regulation 19): Core Policy 41, 42, 50, 51, 52, 58, 67

3. The current and emerging Local Plan for Wiltshire (WLP) is deemed to carry weight as well as Wiltshire Core Strategy 2015 (WCS), which are coherent strategies for managing renewable energy development that is consistent with national planning policy and guidance.

4. WCS Core Policy 42 and WLP Policy 86 identify how standalone renewable energy installations, of all types, will be encouraged and supported in the context of delivering sustainable development, addressing climate change and helping Wiltshire to transition to a low-carbon future. It states:

   In all cases, proposals will need to demonstrate the satisfactory resolution of all site-specific constraints. In particular, proposals will need to demonstrate how impacts have been assessed, including any cumulative effects

[1] National Planning Policy Framework December 2003
[2] Para 160 (a) NPPF
[3] Wiltshire Local Plan Pre-Submission Draft 2020 – 2028 (Regulation 19)

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and, where applicable taken into account the following considerations in accordance with other relevant policies of this Plan.

5. From those policies the following are applicable to this application:

    a. the need to balance the wider environment, social and economic benefits of renewable electricity;

    d. the need to conserve and where possible enhance biodiversity including species and habitats;

    f. the cumulative environmental effects of proposals with other renewable energy installations;

    g. best and most versatile agricultural land;

    h. for ground mounted solar development, that grazing practices are maintained particularly within defined SAC bat sustenance zones;

    i. the proper functioning of the local highway network, recognising the value and function of the designated right of way network;

    k. amenity of local residents, including noise, odour, visual amenity and safety.

The Site

6. [4]Wiltshire Core Strategy Policy 51 (Also for consideration Policy 91 of Wiltshire Local Plan Pre-Submission draft 2020 – 2038 to replace Wiltshire Core Strategy – Core Policy 51) states that:

Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting.

7. It is accepted that the site does not fall within a designated landscape, and this should be considered to be an oversite of previous determinations, but it forms part of a 'valley' in the iconic Vale of Pewsey; it is on the southern boundary of the North Wessex AONB ("NWAONB") approximately 2.5 miles to the north; it has ancient woodland on the southern boundary; and it lies within the buffer zone of the Salisbury Plain Special Protection Area and its accompanying designations, all of which contribute to the area's special qualities.

8. National and local policy, particularly, Policy 23, make it clear the great weight is required to be given to conserving the landscape and natural beauty of an AONB, including its 'setting' – the site in this case is deemed to be part of the 'setting' that should be conserved.

9. The landscape of the valley is dynamic, with wide vistas, sparse of buildings, with a network of ancient hedgerows interspersed with native trees, a place of peace. Such is the bucolic setting of the landscape that it is the undisturbed home of many indigenous and visiting species of mammals; amphibians and birds, some common, some rare, and it is also within the buffer zone and annual monitoring for Stone Curlews on Salisbury Plain.

10. The sparse infrastructure that might be deemed to affect the special qualities of the landscape are the few pylons and the railway line. The pylons, which are situated throughout the Vale of Pewsey and the NWDAONB, are lofty structures which merge into the landscape, whereas arrays of rows of solar panels have a density that is incomparable. It is hoped that the National Grid, in due course, will continue its work of dismantling pylons and burying cables underground as they are doing to the north of Devizes, not far away from the proposed development area. That grid line is also not within a designated landscape area, but similar visual amenity reasons were paramount. The passing trains are intermittent and either by noise or visibility are not invasive.

11. To evidence the qualities and local knowledge of the landscape, weight should be given to the description by the current landowner: [5] '*Our farm is all within the Higher-Level Stewardship Scheme such is the value that Natural England have placed on the farmed landscape here*'.

Scale of the Proposed Solar Farm

12. In excess of 200 acres (88 hectares) of versatile and open farmland would be covered with an array of solar panels and their associated infrastructure.

[4] Also for consideration Policy 91 of Wiltshire Local Plan Pre Submission draft 2020 – 2038 to replace Wiltshire Core Strategy – Core Policy 21

[5] PL/10190/FUL (amended) – Philip Abbatt

13. The Planning, Design and Access Statement (PDAS) lacks detail of the total area of industrialisation of the site there would be, but a review of what information there is, indicates the following, although not exhaustive list, of infrastructure:

- 88 acres array of 3.2m high solar panels supported by using pile driven steel posts
- 3.37m substation plant building providing 38sq m of floor space right in the centre of the open landscape
- 15m high tower
- 40' long battery housing units, the specification of which is yet to be provided
- approximately 6.67km of 2m high metal fencing around the site and PROWs, excluding fencing round inverters etc.
- portacabin(s)
- security lights
- wc
- security hut
- inverters
- hard landscaping of internal tracks

14. Cumulatively, this would be very large-scale industrialisation of open countryside. We would suggest that under normal planning rules, an application to build on this scale in undeveloped, open countryside would not be granted permission, as it would dramatically, adversely and irrevocably affect the setting and be seen to harm the landscape character in the location proposed.

15. By virtue of its size and location it would be impossible for the solar panel farm to have anything else but a significant and irrevocable adverse effect on the landscape and the environment for the proposed 'temporary' period of 50 years. It is of note that no solar farm in the UK has yet ended its period of existence, so it is 'crystal ball gazing' to say that either the temporary period or the scale of the proposal will not affect the site and the surrounding countryside.

Connectivity and Electricity Supply

16. The Council's target for facilitating 590MW of solar energy by 2030 is understood to already been exceeded.

17. It is stated in the PDAS that the proposal would produce enough electricity to power the equivalent of 15,000 homes. It is well documented that the performance of solar panels falls by between 0.5 to 1% per year as the solar panels age and degrade, so that after 50 years, electricity production would be considerably reduced and the capability to power the number of homes referred to is highly doubtful. Added to which are extremes in changing weather patterns, the site is north facing and would be subject to dunkelflaute (Refers to periods when cloudy, cold, and windless. When dunkelflaute events occur, grids have to fall back on other energy sources), which have not been considered in the supporting documentation.

18. It is understood that in any case National Grid is unable to currently facilitate any further connections to the grid.

Impact on the Landscape

19. Section 15, para 180 of the [6]NPPF December 2023 is entitled 'Conserving and enhancing the natural environment and states:

Planning policies and decisions should contribute to and enhance the natural environment by:

a. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)

b. recognising the intrinsic character and beauty of the countryside

[6] National Planning Policy Framework December 2023

20. Wiltshire Core Strategy (WCS) Policy 15 updated and replaced by WLP Policy 91 confirms the NPPF 2023. It also states that:

*Proposals for development outside an AONB that is sufficiently prominent (in terms of siting or scale) to have an impact on the area's special qualities, as set out in the relevant management plan, **must** also demonstrate that it would **not** adversely affect its setting (our emphasis).*

21. Wiltshire Core Strategy (WCS) Policy 42 replaced by Policy 86 (511) states:

Proposals for development of renewable energy installation within Wiltshire will require careful consideration due to their potential visual and landscape impacts, including cumulative impacts with other similar developments. In all cases, proposals will need to demonstrate the satisfactory resolution of all site-specific constraints.

Landscape Sensitivity

22. The inherent landscape sensitivities of the site include that it is peaceful, rural, with extensive views and has its remaining traditional field patterns with hedgerow boundaries.

23. The test for sensitivity is set out in the [7]Landscape Sensitivity Assessment (LSA) as referred to in WLP (para 5.111) and [8]Wiltshire Council's Climate Strategy. The application does not refer to these documents, which are fundamental to determining the outcome of the application.

24. The LSA defines the site as '11 Rolling Clay Lowland'.

25. At para 2.12, the LSA draws on advice contained in Natural England's Approach to landscape sensitivity assessment (2019) which supersedes 'Techniques and criteria for judging capacity and sensitivity (Natural England 2022). This describes the term 'landscape sensitivity', within the context of spatial planning and land management, as follows:

Landscape sensitivity may be regarded as a measure of the resilience, or robustness, of landscape to withstand specified change arising from development types or land management practices, without undue negative effects on the landscape and visual baseline and their value.

26. Chapter 2 of the LSA sets out the potential landscape impacts:

> *2.3 Solar PV developments although not prominent in terms of height, can occupy substantial areas of ground which may be visible, particularly if located on slopes (the case herein as it is a north facing slope) and that the landscape effects may include:*
>
> - *Solar PV developments may be particularly visible in open landscapes or on upper slopes of hillsides or where overlooked;*
> - *On a sunny day they can appear blue, while on a cloudy day they can appear a dark grey, both of which contrast with surrounding green areas;*
> - *The presence of Solar PV panels and associated infrastructure may increase the perceived human influence on the landscape and erode intrinsically rural character;*
> - *Solar PV development will change the land use and appearance of a field or fields, affecting land cover patterns;*
> - *The regular edges of solar PV developments may be conspicuous in more irregular landscapes (particularly where field boundaries are irregular);*
> - *The height of racks (up to 3 metres) may overlap typical hedgerow field boundaries;*
> - *Screen planting around solar PV developments may change the sense of enclosure of a landscape;*
> - *Construction of solar PV development may result in damage to landscape features such as hedgerow field boundaries and alter the landscape scale and*
> - *Structures may appear out of place in particularly wild or undeveloped landscape which are valued for their qualities of remoteness.*

We consider that each one of these criteria apply and will impact upon the landscape.

27. Para 2.6 of the LSA, identifies various sizes of developments for the assessment of the impacts of solar energy development on the landscape. In this case, the starting point is that the sensitivity score of the site area is 5 (lowest category), but as the size of a development increases to 'very large-scale development at 50 – 120 hectares', which is the case here, the sensitivity score increases to category 2.

[7] Wiltshire Council Renewable Energy Study: Landscape Sensitivity Assessment, Land Use Consultants Ltd (LUC) March 2023
[8] Climate Strategy Delivery Plan for Wiltshire September 2022

28. All the foregoing evidence that the sensitivity of the site and the landscape setting would be severely compromised, and the natural environment would not be protected. The mitigation steps (by definition 'mitigation' would indicate that the applicant accepts there will be harm) are pointless, as no solar panel farm development has reached its end of life, so what is proposed is untested.

29. Overall, the proposal would not conserve and enhance Wiltshire's natural environment. Should planning permission be granted it would not protect and enhance the valued landscape, and it would not recognise the intrinsic character and beauty of the countryside. The proposal would conflict with the NPPF, WLP, and Wiltshire Core Strategy.

Loss of Productive Farmland

30. At least 200 acres of versatile, arable fields will be lost. As a starting point we would say that there would be harm from the loss of the agricultural land, which is not outweighed by the possible benefits in terms of renewable energy provisions and emission reduction. A ministerial statement said:

[9]to be clear that any proposed solar farm involving the best and most versatile (BMV) agricultural land would need to be justified for the most compelling evidence.

31. The application does not provide compelling evidence as to the justification for the loss of BMV. The designation of the land in question is 3B but we consider that is a generic designation as it fails to take account, in this particular case, local knowledge that the land has produced well above average yields of spring/summer and winter crops; used for grazing cattle; and grown *'crops for human consumption'[10].*

32. Food Security in the UK is more relevant than ever. Initially of late, it was the effects of the war in Ukraine, added to this now the conflict in the Middle East and the disruption in the Red Sea, which are resulting in the container shipping costs quadrupling with significant delays. There is a growing trade in illegal imports of meat, which can introduce African swine fever; and the Environment, Food and Rural Affairs Committee has recently expressed their concerns to Defra about the level of meat being confiscated, with 5.5. tonnes were confiscated over the weekend before Christmas (2023) alone.

33. Saving versatile agricultural land from solar panel farm developments becomes more vital as extreme weather conditions, both summer and winter, are harming UK agriculture and has meant that areas where food crops are grown have been unable to get them out of the ground, either being too wet or destroyed by drought. The intensity of rain recently has, in some regions, left growers with problems they have not experienced for several years. With a growing population, a reduction of farmland used for agriculture is unsustainable and would leave the UK increasingly dependent on imported food.

Maintenance of the site

34. The Planning Statement states that the grassland would be maintained by low intensity grazing by sheep. We would suggest that any grass that might grow in the shade of solar panels would not be sufficient to support economical sheep grazing for more than a few weeks and is an example of the applicant's tokenism.

35. It is noted that the maintenance of the site includes treatment of annual grass/vegetation with Glyphosate for which there is no conclusive evidence as to the harm the chemical can do to the environment or humans. In addition to this chemical use, there will be cleaning of solar panels with specialist equipment, which will introduce more chemicals into the environment with an inevitable run off into the water courses. During the 50 years of proposed operation there will be inevitable degradation of the soil and the nearby water courses will be polluted.

Site Security

36. The site would be surrounded by 2m high stock proof fencing. We would have expected to see a report/comment by Wiltshire Police Architectural Liaison Officer, or similar, as to the suitability and height of the fencing for security purposes.

[9] https://questions-statements.parliament.uk/written-statements/details/2015--3-25/HCWS488

[10] Planning Ref 17/10190/FUL – Ailsa Abbatt landowner

Ecological impacts

37. The solar panels and infrastructure that will be introduced onto the site and its surroundings will have great potential to impact on the various species that visit/feed on the site including great crested newts and bats, which are protected, and numerous species of birds.

38. The application fails to take into account the feeding habits of visiting birds, particularly winter visitors, such as Starlings, Lapwings and Corvids. These birds swarm feed (akin to a murmuration but on the ground), who will lose a feeding ground of in excess of 200 acres due to the coverage by arrays of solar panels and the accompanying paraphernalia.

39. The stock fencing would prohibit the free passage of species known to visit the area, local knowledge is that there are badgers, hedgehogs, foxes; hares; and deer who are likely to collide with it or become injured trying to exit or entrance the site. There is no provision for safe movement of any species by way of mammal gates/pop-holes.

Bats

40. The site is within a defined [11]Bat Special Areas of Conservation (SAC) sustenance zone and is utilised as a corridor and significant foraging area for numerous endangered and common species.

41. A biodiversity net gain is alluded to by applicant, which is far from guaranteed in any case, since there is no way of knowing **exactly** how bats, birds and other species —would react to the vast area of solar panels and other hard structures, some the height of double-decker buses that will cover the entire site.

42. The installation of solar panels and the added industrial forms of paraphernalia would change irrevocably and impact upon the foraging and feeding habits of the bats. The loss or removal of foraging pasture/habitat, which is vital for endangered bats must weigh heavily against permitting development of the site when considered in terms of the planning balance. Great weight should be given to the [12]Planning Guidance for Wiltshire regarding the potential impacts of development on bats' foraging areas and commuting corridors.

Access

43. It is well documented in the [13]Potterne Neighboured Plan made in January 2017 that traffic had risen to dangerous levels making it unsafe for children to cross the street (para 1.3.1) and the plan supported provision for traffic calming management on A360 and other roads approaching the village (para c.2.5).

44. The construction and maintenance of the site will exacerbate the traffic issues identified seven years ago in the NDP to even more dangerous levels, particularly, within the village and the single-track access road.

45. There is no engineer's report or survey as to the sustainability of the bridge that crosses the water course on the unnamed lane that leads to the site, or the long-term effects of the numberless heavy and wide vehicles that will use it.

46. The application states that if the bridge is not suitable a temporary one will be installed. We would have expected to see comments from the Environment Agency as to the design of the proposed bridge, as an inappropriate design can lead to an increase in flood risk elsewhere.

Decommissioning

47. The application provides little information regarding decommissioning of the built infrastructure after 50 years of operation, which will have all the effects in reverse of the build/construction. There is no economic or technological solution to enable solar panels to be recycled, the only option is they are sent to landfill. Of great concern is that the owner would no longer be in existence to carry out the very large costs of decommissioning and/or the site becomes derelict before expiry of 50 year, particularly with the advances in research into alternative sources of green energy. When decommissioned, due to the industrialisation, the site will have become brownfield and totally unsuitable for the [14]type of agricultural undertaken on it at the moment.

[11] Bat Special Areas of Conservation (SAC)
[12] Bat Special Areas of Conservation (SAC)
[13] Potterne Neighbourhood Plan made in January 2017
[14] https://www.potternepark.co.uk/about-our-farm

Solar Panels

48. There is no apparent information in the application as to where the solar panels are being sourced which is concerning if they might be manufactured in China.

49. The Government's position on human rights violations and the use of forced labour in XUAR and Uyghur Region in China is forceful and resolute. [15]Its aim is that no company that profits from forced labour in Xinjiang can do business in the UK. Since at least 2021 there has been international outrage regarding the production of solar-grade polysilicon, with a series of reports undertaken to determine whether produce lines are XUAR-input-free.

50. [16]The Hallam University report found it sometimes impossible for their assessment purposes to determine if it was the case that dedicated solar product lines were XUAR-input-free because companies did not supply sufficient supply chain information. Assessments by Hallam make it clear that many solar modules being sold into international markets are indeed still very much exposed to Uyghur forced labour.

51. If the application is approved, we would expect Wiltshire Council to require the applicant to undertake and produce for its consideration an Assessment Model Decision Tree (page 59 Sheffield Hallam report), See attachment, to evidence that no one in the UK would benefit financially from human rights violations, including the applicant and Wiltshire Council, by way of business rates.

Conclusion

The benefits of the proposal, if there are any, would be insignificant and would be clearly outweighed by the harm to the environment, to the landscape, to the ecology and biodiversity and loss of farmland.

We believe that Wiltshire Council should be promoting their proposals (WLA Policy 85) for **Roof Top Solar** and supported by CPRE's report (CPRE Shout from the rooftop delivering a common-sense solar revolution May 2023) in this respect.

https://questions-statements.parliament.uk/written-statements/detail/2015-03-25/HCWS488 Eric Pickles, Secretary of State, Communities and Local Government

Meeting our energy goals should not be used to justify the wrong development in the wrong location and this includes the use of high-quality land. Protecting the global environment is not an excuse to trash the local environment, which we believe is the case herein.

We have reviewed and support the evidence for **refusal** well-articulated by Potterne Parish Council.

CPRE Wiltshire wholeheartedly objects to this Application and we invite Wiltshire Council to refuse it.

Yours sincerely

Anne Henshaw

cc Potterne Parish Council clerk@potterne.info

[15] In Broad Daylight, Uyghur Forced Labour and Global Supply Chains May 2021

[16] Crawford Murphy et al – Sheffield Hallam University Uyghur Region Exposure Assessment for Solar Industry Sourcing – July 2023 (updated November 2023 to reflect additional evidence)

Assessment Model Decision Tree

