The developers make a number of claims that should be challenged as they either conflict with the Inspector's ruling, are misleading or are untrue…

They claim that the heritage assets have limited views of the site… The Inspector was clear that the views to consider are not just from the heritage assets (there are 67 in the vicinity) but the views experienced by everyone journeying around the assets and their setting. The site, which can be seen clearly from multiple points, is historically unique and links South Wraxall, Great Chalfield and Atworth.

They claim that with additional planting and screening the heritage assets will not be adversely affected… The Inspectorate stated that any view, however limited, would cause harm to the significance of heritage assets. The assets are still where they are and the new proposal is on the same site, therefore the heritage assets would still be adversely affected as ruled previously.

They claim that additional hedgerows and planting will screen the site from residential properties and Public Rights of Way… As with any screening mitigation it would be devoid of leaves during the winter resulting in clear views of the entire site for 6 months of the year, which is significant given it is on, or close to, public roads on two of its three sides. The Inspectorate stated that the previous scheme would have a major adverse impact, industrialise the countryside and harm the landscape character. The new scheme is increased in size, height, scope and number of built elements, including noise emitting battery storage.

They claim there are no designated biological or landscape areas nearby...
However, the area is bounded on both sides by AONBs (Cotswolds, North Wessex Downs and Cranbourne Chase & West Wilts Downs), the Green Belt is just 500m away to the West and Salisbury Plain to the South. The site is, by its close proximity to AONBs and conservation areas, very beautiful and tranquil. The damaging effect on this sensitive landscape would be significant.

They claim that the site is low ecological value… suggesting that it is suitable for industrial development. **They claim that the soil quality is low**… this is untrue, 3b soil is not low quality, this grade of land makes up 60% of all UK's farmland and is the backbone of British food production. **They claim that the farming of this field uses pesticides and fertilisers that leach into the watercourse**… this is untrue… the field is farmed, managed and monitored to the highest standards.

They claim that national policy has changed since the last application... In response to climate change, The British Energy Security Strategy as of April 2022 states that the focus is on nuclear, off-shore and on-shore wind, hydrogen and heat pump manufacturing, with solar on domestic and industrial roof tops. It does not state that solar should be sited on productive farmland. The additional guidance the planners are now asked to consider are cumulative impact and community support.

They claim they will achieve a Biodiversity Net Gain… This means they would have to leave the natural environment in a measurably better state than it was beforehand. The biodiversity initiatives offered by the developer are not reliant upon the solar farm, they can be implemented by the landowner/farmer as part of their ongoing land stewardship without any industrial development. But if the development goes ahead, the loss of over-winter stubble and the barring of large free-roaming wildlife would actually result in a biodiversity net deficit. DEFRA clearly states that habitat fragmentation is considered a biodiversity loss.

They claim that ecological enhancements will provide improved opportunities for bats from the SAC which utilise the area… Any enhancements can put in place without the solar development. The introduction of industrial buildings and industrial noise would have a negative affect on resident bats and further contribute to a biodiversity net loss.

They claim that the development will not exacerbate off-site flooding… The site is located in flood zone 2 and is susceptible to groundwater flooding. The surrounding roads flood regularly. Ground compaction is the problem with solar farms as the heavy construction work needed to build them severely compacts the soil over the entire field. A farmer will subsoil (plough) after every harvest to aerate the soil and add organic matter to maintain its fertility and drainage. The compaction, and therefore poor drainage, caused by construction can't be repaired as the field is covered in solar panels and buried cables which would be pulled out by deep cultivation. The soil would remain compacted for the lifespan of the solar farm and the surrounding area would be subject to long-term increased flooding.

They claim that the layout has been optimised to ensure noise levels experienced are low… British Standards and Best Practice state that the level by which the rating exceeds the prevailing background sound level indicates the following potential impacts as specified in BS4142: A difference of 10 dB or more is an indication of a significant adverse impact, a difference of around 5 dB is an indication of an adverse impact, only where the rating level does not exceed the background level is it an indication of the specific sound source having a low impact. The developer's own noise assessment map clearly shows significant adverse impact along at least half of the adjacent road, meaning that walkers, cyclists and riders passing by would experience industrial noise of up twice the level considered a significant adverse impact. The rest of the surrounding roadway would experience an adverse impact and the nearest residential receptors would be at the acceptable noise limit. Context has also not been accounted for given that any industrial noise deep in the countryside would be experienced as being much louder and therefore of increased severity.

Important considerations that the developer has omitted…

Cumulative impact… Given that there is in excess of 260 acres of solar farm development within 3km, rising to over 600 acres within 5km, cumulative impact of such massive industrial development in such a small rural community is of critical concern. The Council recognises that there is very likely to be significant effects on the surrounding Wiltshire Landscape Countryside Character arising from the cumulative impact of the proposed solar farm together with existing and approved solar farms in the immediate locality.

Further industrialisation once a precedent has been set… There has been a rash of developments locally. Given that once a solar farm is in place, an 'industrial' landscape is set, the proliferation of further development of this type would very likely result in the addition of further solar farms or a reserve power scheme (comprising; standby generator compound, two-storey steel acoustic lined containers, external fuel tanks, transformers and acoustic fencing) as at Roundponds.

Management of wildlife deemed as pests to solar farms… Pigeons, squirrels and rabbits are a major problem for solar farms as they damage the cables and cause fires. The necessary use of traps, deterrents and possibly even poison would fly in the face of any biodiversity claims.

Environmental responsibility… Nearly 80 million tonnes of solar waste will be in landfill by 2050. The panels contain heavy metals, such as lead and cadmium which can leach out of the cells and into ground water. The average lifespan of the batteries is 5 to 10 years so will need replacing regularly. There is a heavy environmental price to pay as lithium is a non-renewable material, it is classed as dangerous and toxic, and less than 5% of all lithium batteries for any application are recycled.

Food security… Farmland is already a renewable energy producer, making food from sunlight. Sacrificing that national asset to produce industrial solar energy will result in serious implications for British food security. Our solar farms should be wisely sited, making the most of disused, unproductive spaces and industrial roofs. There are alternatives for where solar can be sited, but not our farms.