

Summary of Objections for Wood Lodge Solar Farm Planning Application NE/23/00858/FUL:

This application has been poorly executed with many incorrect facts, has ignored Planning Regulations and omits many legally required surveys and should be refused.

- This Solar Farm application goes against Government Planning Laws including the NPPF
- This Solar Farm goes against North Northants's Local Plan
- Farmland is a totally inappropriate site for solar panels
- 28ha of BMVL lost forever with more proposed
- Legally required Shadow Habitats Regulations Assessment protecting nearby RAMSAR site and its Functionally Linked Land not submitted
- North Northants Council are obliged to request a dormouse survey from the developers on ANY proposed development site
- No Dormouse Survey has been submitted, neither has any Mitigation been proposed, which should be done in advance
- Biodiversity Net Gain data not provided and incorrect metric used
- Factual errors and scant details in archaeological reports
- The Joint Core Strategy states that Developer should have contacted Power Distributor at an early stage to enquire about the possibility of connection to the National Grid. We know that they do not have enough capacity to take the electricity produced at this site
- Wide rural vistas providing tranquillity and promoting mental wellbeing lost forever
- Footpaths providing amenity and promoting physical well-being lost
- Ecological Surveys incomplete or missing
- Solar Panels proven to have negative effect on many wildlife species
- Crucial breeding habitat for red listed bird species such as the Skylark lost
- Habitat degradation affecting many hedgerow dependant bird species and dormice
- Important habitat for numerous species of bats including rare Barbastelle
- Panels have adverse effects on bat populations of which there are numerous and rare species including the Barbastelle in the vicinity
- Sheep Farming as a method of management not practically convincing
- Soil is too fertile to become tussock grassland and wildflower meadows
- Access roads via dangerous J15 of the A14 and a bridleway totally inadequate to carry high numbers of HGVs
- Solar Farms are known to be targeted by thieves therefore increasing crime in the area
- Maintenance chemicals likely to contaminate good grade farming land
- Important archaeology destroyed forever

- **This site is exactly 49.9MW to “get around” planning law, as we know if it was 50MW projects in the UK are defined as Nationally Significant Infrastructure Projects and go through a more rigorous and lengthy approval process. We know more acreage is proposed so cumulative effect should be considered.**
- **Not enough research has been done to discover the impact of Solar Farms on the ecology.**
- **There is no guarantee that this good agricultural land will ever be able to used again for food production.**
- **It is clear that at this proposed site the harm by far outweighs the good and the Precautionary Principle should be followed.**

Government Policy

- **This Solar Farm application goes against Government Planning Laws.**
There are many but here are a few.

From 1.1 A Green Future: Our 25 Year Plan to improve the Environment 2018

[A Green Future: Our 25 Year Plan to Improve the Environment](#) sets out the government's 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It plans to:

- protect the best agricultural land
- put a value on soils as part of our natural capital

From 1.2 National Planning Policy Framework (NPPF)

LPAs should use the NPPF to make decisions about the natural and local environment to:

- protect and enhance landscapes, biodiversity, geology and soils
- recognise soils as a natural capital asset that provide important ecosystem services
- consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land
- prevent soil, air, water, or noise pollution, or land instability from new and existing development

From: 1.3 Town and Country Planning (Development Management Procedure (England) Order) (DMPO) 2015

Planning authorities must consult Natural England on all non-agricultural applications that result in the loss of more than 20 hectares (ha) of BMV land if the land is not included in a [development plan](#). For example, this includes the likely cumulative loss of BMV land from the proposed development if it's part of a phased development.

- **This site is exactly 49.9MW to “get around” planning law.**

We also know if the application was 50MW projects in the UK are defined as Nationally Significant Infrastructure Projects and go through a more rigorous and lengthy approval process

There are solar farm applications adjacent to this site so the cumulative loss of BMV land must be considered along with any other pending applications.

North Northants Planning Policy

- **This Solar Farm goes against County Planning Law**

From North Northants Joint Core Strategy 2011-2031 Adopted July 2016

RENEWABLE ENERGY POTENTIAL IN NORTH NORTHAMPTONSHIRE

“8.32 Resource opportunities from biofuels and renewables will have to be balanced with food production needs. Such land-uses should avoid the use of the best and most versatile agricultural land where possible, and incorporate opportunities to increase biodiversity.”

From East Northants Wind and Solar Energy Supplementary Planning Document Sep 2014

9. Landscape and Visual Impacts Planning policy context and Government guidance

9.4 The NPPG notes that cumulative impacts require particular attention, especially the increasing impact that wind turbines and large-scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases.

9.8 Understanding the character of the landscape is fundamental to ensuring that new development can be accommodated successfully within a landscape. The Environmental Character Assessment, referred to in Policy 13 of the CSS, describes the Environmental Character Areas (ECA) that can be found in Northamptonshire and the characteristics which set one area apart from another. Applicants should also refer to the National Character Areas (NCAs) which divide England into 159 distinct natural areas. East Northamptonshire District falls within the following NCAs: 92: Rockingham Forest

9.13 Cumulative landscape impact refers to the effects of a proposed development on the fabric, character and quality of the landscape and is concerned with the extent to which developments begin to collectively change the overall character and perception of a particular landscape.

9.14 Cumulative Impact is an extremely important consideration. In isolation the landscape and visual impact of a scheme may be limited, but may be unacceptable when considered together with the impact of other developments in the area. The assessment should therefore consider the potential cumulative impacts of the proposed development. The

applicant shall agree with the Council the schemes to be included in the assessment and the area over which the impact should be assessed.

9.15 Cumulative visual impacts concern the degree to which proposed development will become a feature in particular views or sequences of views and may arise when two or more developments will be visible from the same point or shortly after each other along the same journey. Hence, it should not be assumed that, just because no other sites are visible from the proposed development site, the proposal will not create any cumulative effect

Heritage Assets

10.4 The NPPF (P a r a 1 3 2) highlights the need to give great weight to the conservation of heritage assets with the greatest protection given to scheduled monuments and grade I and II* listed buildings, parks and gardens. Any harm to a designated asset requires convincing justification. Where the harm is substantial, consent should be refused unless outweighed by substantial public benefits or the development would meet several tests for the conservation of the asset. Where the harm is less significant this should be weighed against the public benefits, including securing the optimum viable use of the asset. However, it should be noted that the Barnwell Manor decision (Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others 2014 EWCA Civ 137) has confirmed that the decision maker must give considerable importance and weight to the desirability of preserving the settings of listed buildings even where the harm would be less than substantial. English Heritage's document 'The Setting of Heritage Assets'

10.13 Indirect impacts.

The significance of a heritage asset derives not only from its physical presence and historic fabric but also from its setting. The NPPF defines the setting as 'the surroundings in which the heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

Proposals may impair the setting of heritage assets and can compromise the visual amenity of the wider landscape, detracting from the historic character and sense of place. Developers of ground-mounted solar PV arrays may be attracted to southerly sloping sites where solar gain is greatest but the development is likely to be visible within the wider landscape.

Biodiversity

11.2 The NPPF indicates that planning permission should be refused where significant harm cannot be avoided through locating on an alternative site; adequate mitigation or, as a last resort, compensation.

Assessment of Biodiversity

11.10 Applicants are therefore strongly advised to avoid areas of ecological importance, especially areas of international, national or local designation.

12. Agricultural land Planning policy context and Government guidance

12.1 A core planning principle of the NPPF is to encourage the re-use of previously developed land, provided that it is not of high environmental quality. The Government has emphasised that solar energy growth should be firmly focused on domestic and commercial roof space and previously-used land. 35

12.5 If the survey indicates that the site includes best and most versatile agricultural land the assessment will need to explain why the development needs to be located on the site rather than on land of a lesser quality. In addition, proposals on agricultural land will need to demonstrate that the solar farm will not preclude the continued use of the land for agricultural purposes and/or will provide biodiversity improvements around arrays.

Flooding

Advice for preparing Solar Farms flood risk assessment (FRA)-

13.7 Given that solar arrays have the potential to concentrate surface water run-off in localised areas, this issue should be considered as part of the FRA. For example, surface water draining off and around both the individual panels and whole rows will drip off the lower edge of the panels and through the gaps between each individual panel. This has the potential to build up surface water run-off in the areas directly below the edge of the panels. And depending on ground conditions, this may lead to localised areas where the infiltration capacity of the ground is exceeded, resulting in overland flows. Cut-off swales or French drains may be required to intercept overland flows to ensure that flood risk is not increased to the surrounding area and 29 third parties.

Construction Management

20.2 Turbine and solar PV array foundations. To ensure that solar farms can be returned to a more intensive agricultural use, the arrays should normally be installed using 'pile' driven or screw foundations or pre-moulded concrete blocks. The latter may be a requirement where the development is located within an archaeological sensitive area;

21. Decommissioning schedule Planning policy context and Government guidance

21.1 The NPPG advises that consideration should be given to the use of planning conditions to ensure that redundant wind turbines and solar arrays are removed when no longer in use and land is restored to its former use.

22. Grid connection

22.1 The provision of infrastructure to connect the development to the grid and the capacity of the network will be taken into consideration when determining planning applications for commercial wind and solar farms intended to supply energy to the grid. Whilst the

Overarching National Policy Statement for Energy (EN-1) advises 40 that ensuring a suitable grid connection is the responsibility of the applicant, The Council must be satisfied that there is no reason why, in principle, a grid connection would not be possible. Ideally, this should be demonstrated through the submission of evidence of a formal offer of a connection from the service provider.

- **The Joint Core Strategy states that Lighthouse should have contacted Western Power at an early stage with regard to their proposal but they have not**

22.2 Western Power Distribution (WPD) or the relevant organisation should be consulted on detail at an early stage, so that constraints can be taken into account and sites planned in the most effective way. Where overhead lines would have a significant visual impact, undergrounding will be required to be considered, despite the higher cost and regardless of voltage, unless outweighed by other environmental considerations.

Habitats Regulation Assessment

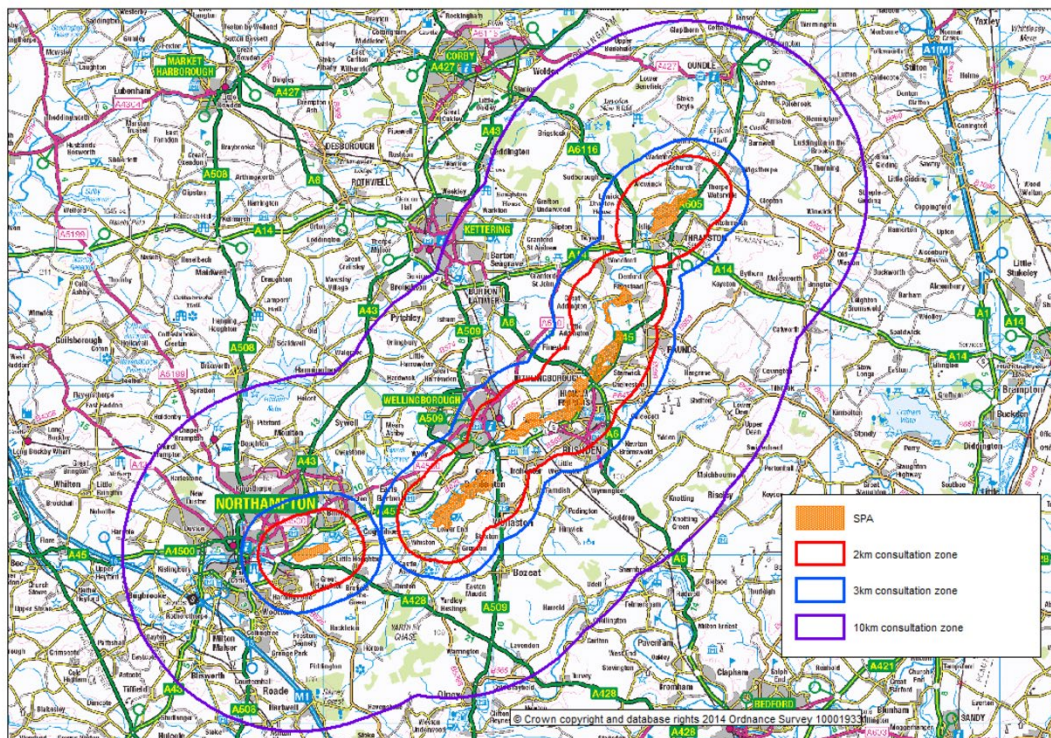
- **Legally required Shadow Habitats Regulations Assessment protecting nearby RAMSAR site and its Functionally Linked Land not submitted**

Natural England's Sebastian Shepherd has stated that this development would meet the requirements for Winter Bird Surveys etc as it is within both 10km and 3km of the SPA and is known to be within 800m of the Golden Plover seen on the Castle Manor Site and numerous other Golden Plover and Lapwing sightings.

"Natural England use the full Impact Risk Zone for functionally linked land which is 10km (within which the council consults us on new developments, and we require wintering bird considerations in environmental assessments)

We have an additional 3km range within which we request even more data and evidence from applicants to determine if land (which is that close to the SPA) has a functional link for designated species."

The developers themselves say they will undertake the required HRA when requested. As it is within the FLL and 3km of SPA this is actually a requirement.



Soil Surveys and BMVL

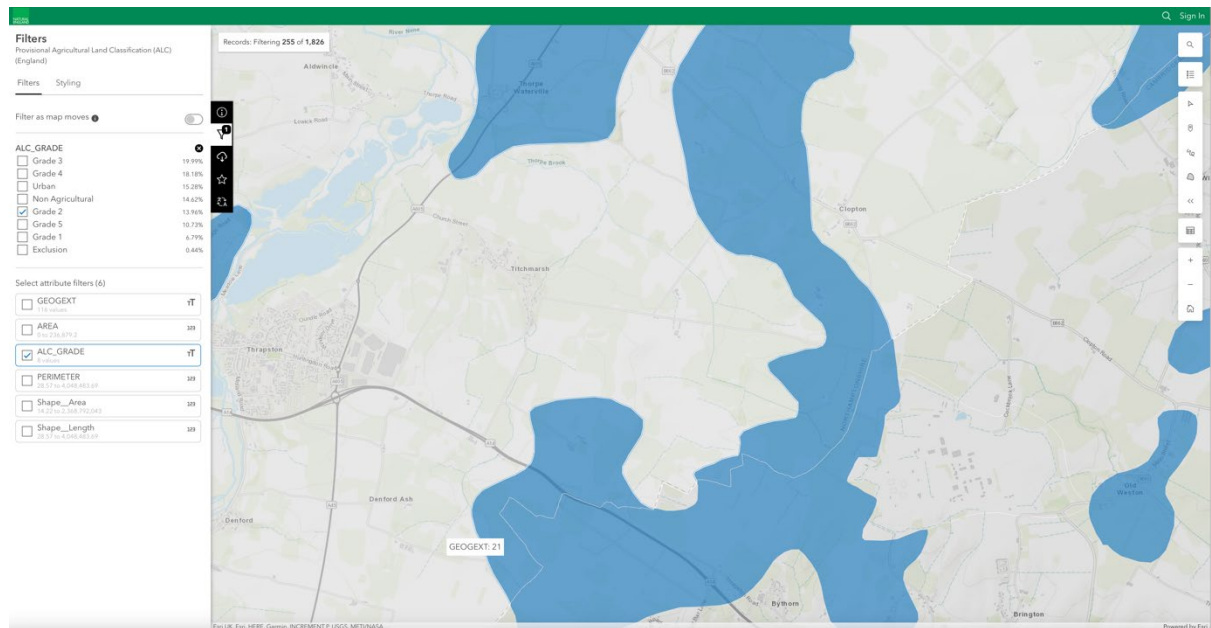
- **28ha of BMVL lost forever and even more from adjacent proposed solar farm planning applications**

The Soil Survey doesn't provide enough detail as to how they decided that the Wetness Level is III.

The data tables don't show the depth of gleying.

The developers haven't shown the 1988 ALC Map of the area but have chosen numerous other maps instead.

Is this because the ALC Map shows the entire area should be Grade 2?



The new DEFRA Provisional ALC Map (England) highlighting Grade 2 Soil areas.

Why have they stated just 9 acres is Grade 3a?

Why is the ALC map showing the incorrect area for Grade 3a soil?

The Soil and Agricultural Survey below summarises the site as only being 14% Grade 3a. This figure of 14% is a major factor in their Planning Statement Report.

Section 3.4 Avoiding Best and Most Versatile Agricultural Land emphasises 14% Grade 3 and “highlights the benefits of the efforts made by the Applicant in undertaking a robust site selection process and identifying an appropriate area with minimal (14%) BMV land, within a surrounding area comprising of good quality agricultural land”.

The developers in their Planning Statement incorrectly conclude and emphasise the BMVI figures from their own Soil Survey report - stating that “80% of the site avoids Best and Most Versatile Agricultural (BMV) land” when in fact their own data in their report states that 57% of the land avoids BMV land.

This is a major error in their data presentation and could lead to people misinterpreting the quality of the land.

The Table 4.2.2 below shows that this land was dismissed as unsuitable by Elgin Solar Developers (Planning Application NE/22/01411/FUL) for the very reason it was Grade 2 soil. Yet this application states that the majority Grade 3b soil.

Cont.

4.2.2 PDA 1

PDA 1 has an area of approximately 74 ha, slightly larger than the proposed scale of the Development.

Topic	RAG Rating	Justification
ALC		Predominantly Grade 2 agricultural land, with a section to the northeast of Grade 3 agricultural land
Flood Risk		The site lies within Flood Zone 1 and limited areas of surface water have been identified. One small section of surface water crosses the PDA on the eastern side.
Planning		The development is compliant with most national, regional, and local planning policy but would require development on an area of BMV land.
Ecology/Ornithology		No European Designated Ecological Sites have been identified within or near the PDA and impacts on sensitive/ protected habitats are not likely but there are some onsite habitats which could support protected species.
Landscape		No landscape designations of local or national importance have been identified within or near the PDA.
Residential and Recreational Amenity		Wood Lodge Farm, Obelisk Farm and Slipe Cottages are either within or adjacent to the PDA. Visual impacts are considered highly likely.
Cultural Heritage		No cultural heritage or archaeological assets have been identified within the vicinity of the Site.
Transport		The A14 runs along the southern boundary of the PDA, which is suitable for HGVs and has links to the wider transport network.
Engineering and Economic Viability		The PDA is adjacent to the point of connection.

Given the higher agricultural land quality (majority Grade 2) and properties adjacent to the PDA, PDA 1 is not considered more suitable for large scale PV development than the Development Site.

In the following section of the Planning Statement the developers emphasise incorrectly that 14% of land is Grade 3a BMV to make the land quality appear inconsequential, when actually 42.8% of the land is Grade 3a.

"8.5.2 Section 3.4 of this Statement addresses the avoidance of Best and Most Versatile land in more detail. The applicant has made significant efforts in avoiding BMV land. This application is accompanied by an agricultural land quality survey by Land Research Associates. The report concludes that 86% of the surveyed land is limited to subgrade 3b, with a small part of the site comprising 3a (14%) which is the lowest of grades contained within the BMV classification."

This incorrect 14% was also widely quoted at the Community Consultation and is again quoted in the Planning Statement. This repeated use of a significantly incorrect statistic is hard to comprehend when it is from their own data showing that 42.8% of the land is actually Grade 3a BMV land

"10.2.5 Residents made comments regarding the quality of agricultural land and the loss of land for food production. In response, it was explained that an Agricultural

Land Classification (ALC) survey had been undertaken by Land and Research Associates, which found that 86% of the land comprised lower grade 3b agricultural land although 14% did comprise grade 3a".

"12.1.16 As has been aforementioned at Section 7 (Implications for Food Production) of this statement, Grades 1, 2 and 3a are categorised as best and most versatile (BMV) agricultural land. As has been outlined above, the site comprises 14% Subgrade 3a agricultural land and as such this would need to be justified with compelling evidence. It has been demonstrated throughout this statement the beneficial use of this land for solar farm development. It has also been demonstrated that a diligent site selection process was undertaken prior to the submission of this application and the site is considered appropriate for its proposed use".

As the developer is quoting the wrong figures for the Soil Survey, we disagree that a "diligent" process has been undertaken.

"12.1.23 This emphasises the efforts that the Applicant has undertaken in their site selection process and identifying an appropriate area with minimal (14%) BMV land, within a surrounding area comprising of good quality agricultural land".

In trying to "emphasise" that the site has "minimal" BMV land by using the wrong data the developer has, at very best, submitted misleading information in their application

Ecology

- **Ecological Surveys incomplete or missing**

There are many errors with these reports, including the Habitat Classification Map (see below) in which you can see is not only in reverse but seems to demonstrate that the Solar Farm will be built on the A14. There are many other maps missing and the report refers to numerous appendices that are also missing

- **Not enough research has been done to discover the impact of Solar Farms on the ecology.**

From Evidence review of the impact of solar farms on birds, bats and general ecology Chris Harrison, Huw Lloyd and Chris Field Manchester Metropolitan University August 2016 as quoted from by Elgin

"Executive Summary

xv In the case of solar farms, there is almost no evidence, and research into their ecological impacts is urgently needed."

"The potential ecological impacts of solar PV installations are poorly understood and there is a lack of coherent guidance in the UK for local planning authorities, statutory bodies, charities, non-governmental organisations, commercial enterprises and ecological consultancies to make informed decisions or provide advice on the potential ecological effects of new and existing solar PV developments."

seeds of species non native - containing seeds of species not native to Britain -let alone this part of England. They usually contain pretty colourful arable weeds. These pretty weeds will not survive and are not found in proper traditional wildflower meadows. Even if all the seeds they source are all from species found in East Northamptonshire, the individual plants will have a very different genetic make-up to our local plants, which could harm the viability of the species in the area.

The Land Management Plan also suggests that Glyphosate (Roundup) will be used quite heavily in weed control which is not environmentally friendly. It also suggests that the site will be hand weeded 4 times a year.

How many people does it take to hand weed 66Ha of land?

The Habitat Management Plan has sheep grazing all year around which is not possible.

More detail on the sheep management is required including conformation as to which mammalian pests will be controlled on site?

Bats

- **Important habitat for numerous species of bats including rare Barbastelle**
- **Panels have adverse effects on bat populations of which there are numerous and rare species including the Barbastelle in the vicinity**

The developers summarise in their Preliminary Ecological Appraisal that:

“Given that no buildings are located on site and all trees are proposed to be retained as part of the proposed development, the lack of records for this species group is not considered a significant constraint to this assessment.”

As solar farms are known to adversely affect bat populations we don't agree with this statement. This is an area rich in 11 of the 18 bat species of Britain and possibly more and with so many trees with high roost potential, with so many bat recordings on other developments, we need to know what is currently on this site. At the other developments bat reports have proven that a large number of species of bats use these fields to forage and commute, and more than likely are roosting in the vicinity. As a protected species they are legally obliged to conduct a survey

- **Landscape and Environmental Management Plan inadequate**

The LEMP states that the site will only have 9 ecology monitoring surveys in the entire 50 years of the site's existence.

How could this be enough monitoring to ensure that new wildlife habitat was working?

What procedures do the Council have in place to ensure these monitoring surveys are conducted, conducted properly?

What penalties are issued if habitats aren't meeting the Management Plan?

Birds

- **Crucial breeding habitat for red listed bird species such as the Skylark lost**

Remarkably, in the developer's Breeding Bird Survey, it is stated that the site was "unsuitable/sub-optimal for Schedule 1 birds", even though they found a Schedule 1 bird breeding on the site and that this area was part of the Red Kite reintroduction site to the UK.

So, we don't agree that it is sub-optimal.

Natural England and the NCC know that this site will require 2 Winter Bird Surveys and Nocturnal Surveys as it is likely to be Functionally Linked Land due to its proximity to the SPA.

Archaeological Reports

- **Factual errors and scant details in archaeological reports**

The Archaeological Report and Geophysics Documents have not been fully published so it is hard to assess impact without complete details.

What has been published suggests that they are planning to use ballast to install the Solar Panels.

Are these pre-cast concrete ballast or poured on-site concrete?

Obviously, there is an increase in cost and significant increase in carbon emissions with concrete. Concrete poured on-site is also irreversible, especially as the entire purpose is to protect the archaeological remains.

What is the overburden stress of ballast on the remains?

How will the use of ballast installed panels be used on slopes rather than the flat?

Most of the site is on a slope.

What base will be used under the invertors?

When will the finalised plans be published as currently, we don't even know the Solar Farm layout nor even how many panels will be installed?

Factual Errors

- **Errors on the developers planning application form.**

The developers state on the form that there are NO important habitats or biodiversity features on site.

The application also ignores the farm workers that will be affected if the application goes ahead, as they state that there are NO existing employees on site.

Road Safety

- **Access roads via dangerous J15 of the A14 and a bridleway totally inadequate to carry high numbers of HGVs**

The A14 Junction with Bythorn is notoriously dangerous. Their report doesn't cover the latest accidents at J15 which will be an important consideration for the application. They state that there will be at least an additional 16 HGV movements a day using this junction and an unknown number of LGV and cars - but their figures are quoted from a solar farm of half the size of the proposed site (20MW & 49.9MW). So how accurate can these figures be?

The Glint and Glare study shows that this proposed Solar Farm will create safety issues on the A14, especially at J14 that already has a poor safety record.

Local Economy

- **No benefit to the local economy**

The report states that there will no local jobs will be created by this development. The Construction workers will be staying in local hotels (of which there are very few) and comparing to the Wales example they quote there may be 30 agency jobs.

Grid Connection

- **The Joint Core Strategy states that Developer should have contacted Power Distributor at an early stage to enquire about the possibility of connection to the National Grid. We know that they do not have enough capacity to take the electricity produced at this site**

NNC has now given planning permission to numerous Solar Farms that have not been able to gain connection to National Grid.

- Kettering Energy Park has had permission for 8 years and still no work has happened.
- Brigstock in 2020 was approved without connection approval and then the developer immediately applied for a battery storage site as well, to try and aid their connection to the Grid.
- Grafton Underwood was granted permission in 2019 and yet again, nothing has been able to happen on this site because the Grid is at capacity.

As both this Solar development and neighbouring Foxhole Farm Solar application are both trying to connect to the same 132Kv pylon that is at capacity - how long will the development actually take?

How is the capacity on this 132Kv transmission pylon line that is operating at capacity now going to be possible?

Are we going to end up having National Grid installing new pylons along the Nene Valley to transmit the electricity?

How joined up and efficient and green are these Solar Farms when they are having to build two Sub Stations just one field apart to create the electricity?

It is clear that these Solar Farms are being proposed in the wrong location.

Visual Impact

- **Wide rural vistas providing tranquillity and promoting mental wellbeing lost forever**

Also, Elgin (Planning Application NE/22/01411/FUL), in their application, stated that the visual impacts were high risk to local homes.

So why does this developer believe otherwise?

This application omits to show the two houses at Coales Lodge on its maps which will be very closely surrounded on 3 sides by solar panels and so will be massively impacted by the proposed development.

This massive Solar Farm is going to change the character of the Northamptonshire Vales significantly and will significantly reduce the number of walkers using the PROWs.

Who is going to want to walk through the centre of a Solar Farm being watched on CCTV, when previously there were quiet, tranquil walks through open farmland with nesting skylarks?

North Northants Council is trying to increase its greenways to get people active in the countryside. CCTV covered footpaths through noisy Solar Farm do not do this.

This entire Solar Farm is in an area designated by East Northants in 2014 as High Sensitivity. It was classed as High Sensitivity for sites above 15Ha, whereas this is for a site 400% larger and if the Foxholes Farm site goes ahead, which is also in the area classed as High Sensitivity, the cumulative impact will be even greater, being almost 1000% bigger than 15ha.

Landscape sensitivity to very large solar PV energy developments (>15ha)

High
Moderate-High
Moderate-Low
Low

East Northamptonshire
District boundary

2 Ironstone Quarrel Plateau
3 Ash and Gifford Plateau
4 Rilling Ironstone Valley Slopes
5 Ironstone Valley Slopes
6 Clay Plateau
7 Wooded Clay Plateau
8 Gifford Plateau
9 Rilling Ironstone Valley Slopes
10 Ironstone Plateau
11 Wooded Ironstone Valley Slopes
12 Ironstone Valley Slopes
13 Ironstone Valley Slopes
14 Ironstone Valley Slopes
15 Ironstone Valley Slopes
16 Ironstone Valley Slopes
17 Ironstone Valley Slopes
18 Ironstone Valley Slopes
19 Ironstone Valley Slopes
20 Ironstone Valley Slopes

This map must be read in conjunction with the text and guidance on landscape sensitivities

Map Scale @ A21:119,000

LUC

From: East Northamptonshire Solar PV landscape sensitivity study - Prepared by LUC March 2014

- **Solar Farms are known to be targeted by thieves therefore increasing crime in the area**

Solar Farms are vulnerable in rural areas where they can be easy targets for thieves. Rural Solar Farm security is becoming big business with high prison style fencing, patrols, lighting, thermal CCTV all fast becoming the norm.

- ## Returning Solar Farms back to Agricultural Use

- **There is no guarantee that this good agricultural land will ever be able to used again for food production.**

The requirement to "restore land to its previous use" is also very different to "returning it to the same grade of farmland". Soil quality is very fragile and the process of installing solar panels on the fields damages the soil whether by compaction with concrete ballast or if installed, by piling. Piling goes much deeper than plough depth and will destroy the soil structure from the offset. 40-50 years of operating Solar Panels will mean the soil becomes compacted, again affecting the soil. Finally, in 50 years' time there is the choice of removing the cabling, concrete and piling to be able to return the soil to farmland or leave these structures within the soil. Both options prevent the soil from being returned to prime agricultural soil capable of growing wheat crops.

As mentioned above, little research has been done on the impact of Solar Farms on the environment but the quote below summarises some of the consequences. Therefore, why ruin good agricultural land to then have to do so much to restore its productivity, if this is at all possible, in the future?

From Craven County Center USA Article by Mike Carroll

Summary

"The assumption that farmland can simply be converted from solar energy production back into agricultural production is not guaranteed".

"The reality is that one will have far greater expenses than income for many years until optimum production conditions are restored. "

The Precautionary Principle

- **It is clear that at this proposed site the harm by far, outweighs the good and the Precautionary Principle should be followed.**

From CIEEM – Guidelines for Ecological Impact Assessment in UK & Ireland 2019

"Impact Assessment

5.35 The evaluation of significant effects should always be based on the best available scientific evidence. If sufficient information is not available further survey and additional research may be required. In cases of reasonable doubt, where it is not possible to robustly justify a conclusion of no significant effect, a significant effect should be assumed. Where uncertainty exists, it must be acknowledged in the EclA."