

22nd June 2025

Planning Department
North Devon District Council
Lynton House
Commercial Road
Barnstaple
EX31 1DG
ATTN Mr R Bagley

Dear Sir

Re: 80182 - Land South of Buttercombe Lane Braunton EX33 2FF

Construction, operation and subsequent decommissioning of a solar farm, comprising ground mounted solar photovoltaics (PV) together with associated infrastructure, including inverters, transformers, substation, cabling, CCTV, fencing, access and landscaping

We object in principle to this application, which proposes to industrialise the countryside outside of the development boundary of Braunton, with the potential loss of 44 hectares of agricultural land.

The applicant's cover letter lists their reasons for selection of this site – all of which we challenge:

- Available grid capacity
 - Not supported by National Grid's response
 - Applicant's own Planning Statement acknowledges no connection for the proposal. They are requesting an extended permission time should the application be approved!
- Site free of any significant environmental, landscape or heritage designations
 - The proposed site is within a Parish Strategic Nature Area as defined by Braunton Parish Neighbourhood Plan NE7. It is also adjacent to a significant Grade II listed manor house Ash Barton, an ancient woodland which is listed as an Unconfirmed Wildlife site and Braunton Down that is a backdrop to Braunton village.
- Site does not include any Best and Most Versatile (BMV) agricultural land
 - Site currently used for arable farming
 - The applicant's BNG metric shows that the site is used for crops that indicates the land is productive agricultural land.
 - The proposal changes the land use from agricultural to industrial
- Opportunities to provide biodiversity enhancements
 - The application if permitted will destroy land that has been in agricultural use for many centuries by taking it out of production and introducing "foreign materials" i.e aggregates. It would also prevent the movement of deer which are known to be in the area. The proposed enhancement is the developer's mitigation for loss of agricultural land
- Adequate access off the public highway
 - We note that DCC Highways has not yet responded in respect of the applicant's proposed route for construction traffic which will be through Braunton and Knowle villages, then along very narrow lanes. The applicant's Transport Report states that there would be 1574 two-way vehicle movements. This is a significant increase in

heavy good vehicles through the villages, which already have known issues during peak commuting times and holiday periods, and would be extraordinarily significant for the lane network.

It is not clear as to how familiar the author of the Transport Report is with the reality of the old narrow lanes when they refer to speed limit of 60mph!

- We would also draw attention to the historic importance of Buttercombe Lane. This is an old track shown on Donn's map of 1765 but likely to be older. It runs through a secluded valley with natural banks and hedgerows to either side. The lane emerges out onto downland at Forches Green, thought to be the site of gallows in the medieval period. These are features in our local landscape that will be irreparably damaged by the introduction of heavy goods vehicles.
- Limited close-range receptors
 - Unsurprising given that the site's location is in the undeveloped countryside
 - The LVIA has scoped out glint and glare considerations as the applicant has submitted a separate report which only considers traffic and aeroplanes. It does not consider the potential visual impact of glint and glare on the landscape for pedestrians/walkers. The proposed site has a number of footpaths in its vicinity – footpaths 31, 33, 43, 56, 37, 6 and 3 from which the proposed site can be seen.
- Existing screening provided by woodland and boundary hedgerows with capacity to provide substantial additional screening from hedgerows and trees which provide opportunities for landscape and biodiversity enhancements.
 - This claimed "opportunity" is to mask the proposed development of a hard infrastructure from visual receptors across the landscape
- Development set within the context of existing infrastructure such as overhead cables and other renewable energy generation including solar farms and wind turbines
 - The applicant appears to be assuming a connection to the power cables that run overhead. As stated above National Grid advise that they have had no request for a connection and the applicant has acknowledged they have no connection
- Located outside of the Green Belt
 - The proposed site is in the countryside as defined in the Local and Neighbourhood Plans. Policy ST07 states that "In the Countryside, beyond Local Centres, Villages and Rural Settlements, development will be limited to that which is enabled to meet local economic and social needs, rural building reuse and development which is necessarily restricted to a Countryside location.
 - For small-scale solar farms (currently below 50 MW) government planning practice guidance says that planning authorities should encourage development on previously developed and non-agricultural land.

It is disappointing to see that neither the Environment Agency (purpose to protect and improve the environment) nor Natural England (purpose to help conserve, enhance and manage the natural environment for the benefit of present and future generations, thereby contributing to sustainable development) have raised no objections to this proposal given the impact it will have on the landscape. We would have hoped that these agencies would be advocating government advice for small scale solar farms which is applicable to this application.

This application should be refused

Love Braunton

Cc Braunton Parish Council