

AGENDA SUPPLEMENT (2)

Meeting: Southern Area Planning Committee
Place: Alamein Suite - City Hall, Malthouse Lane, Salisbury, SP2 7TU
Date: Thursday 16 October 2014
Time: 6.00 pm

The Agenda for the above meeting was published on 8 October 2014. Additional documents are now available and are attached to this supplement as presented at the meeting on 16 October 2014.

Please direct any enquiries on this Agenda to Kieran Elliott, Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line (01225) 718504 or email kieran.elliott@wiltshire.gov.uk

Press enquiries to Communications on direct lines (01225)713114/713115.

This Agenda and all the documents referred to within it are available on the Council's website at www.wiltshire.gov.uk

7 **Planning Applications** *(Pages 1 - 74)*

Additional representations regarding the applications in the agenda have been received as attached.

DATE OF PUBLICATION: 16 October 2014

**SOUTHERN AREA PLANNING COMMITTEE 16th OCTOBER 2014
SCHEDULE OF ADDITIONAL CORRESPONDENCE**

Agenda Item 7a

**Plan List Item 1 14/06864/FUL - The erection of solar photovoltaic panels and associated works and infrastructure, including switchgear, inverter stations, access tracks, security fencing, security cameras, grid connection, together with temporary construction access, compound and unloading area
At Land to the west of Bake Farm Buildings, Salisbury Road, Coombe Bissett, Salisbury. SP5 4JT**

Additional condition recommended by officers to ensure removal of the structures on the site following the cessation of the use.

The development hereby approved shall be discontinued and the land restored to its former condition on or before 31 December 2039 in accordance with a Decommissioning Plan which shall have been sent to and approved in writing by the local planning authority prior to that date, unless before that date planning permission has been sought and granted for the retention of these structures for an extended period of time.

REASON: In the interests of amenity and the circumstances of the use.

Further letters received for Late Correspondence Appendix 1 and Agent Appendix 2

Appendix 1

DROVE HOUSE, DROVE LANE, COOMBE BISSETT,
SALISBURY SP5 4LD

Andrew Bidwell
Wiltshire Council
Development Control South
PO Box 2281
Salisbury
SP2 2HX

22 September 2014

Dear Mr Bidwell

Planning application 14/06864/FUL

Proposed erection of solar photovoltaic panels and associated works and infrastructure on Land to the west of Bake Farm Buildings Salisbury Road Coombe Bissett Salisbury SP5 4JT

We write in connection with the above application. The application was previously submitted with some differences under application number 13/06336/FUL.

We live on Drove Lane and our house is one of the closest buildings to the proposed development, being some 350 metres from the boundary. We submitted an objection to the previous application on 20 January 2014. To assist the Council, this letter is a substitute for our previous letter, not an addendum to it.

We are concerned at the lack of consultation for this second application. Unlike the first application, there has been no public exhibition to explain or introduce the detail of the new proposal to Coombe Bissett residents. The revised site layout is said in the current revised application to have been subject to consultation with "relevant interested parties" (3.61) and a one-page British Solar Renewables brochure entitled 'Solar Farm proposal explained' (received by us in the post) states that the revised application followed extensive consultation with nearest neighbours to the site, but we have not been contacted.

We also do not know why the original application was withdrawn and then resubmitted rather than simply amended. We note that numerous objections were made to the previous application; these are barely referred to in the new application. We understand that some objectors have assumed that their objections would be carried through and reviewed against the new application. Given the close similarities between the old and new applications, we trust that the Council will refer to those objections in considering the new application. If it is not intending to do so, it would be appropriate for the Council to write to those objectors informing them that their previous objections will be ignored.

We would also like to draw your attention to the extreme length and complexity of the application documents. In some respects this is to be welcomed as they provide valuable data relating to the application. However, it also makes the application documents very difficult for members of the public to respond to. We understand that the application documents and supporting reports were prepared or commissioned by the applicant and are intended to support the application; they do not (we understand) purport to be objective assessments. We very much hope that the Council's officers will scrutinise the documents with great care, taking professional advice as required. It should not be for members of the public to have to find the gaps in the analysis.

1 Executive summary

- 1.1 We are supportive of renewable energy initiatives in principle, and in particular we support appropriately sited solar PV installations. Our views are broadly consistent with those set out

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in the most recent government policy on solar PV installations (*UK Solar PV Strategy Part 1: Roadmap to a Brighter Future*; *UK Solar PV Strategy Part 2: Delivering a Brighter Future*). These documents make clear the government's concern about the proliferation of ground mounted solar PV farms and, specifically, the loss of agricultural land and amenity for the local community.

- 1.2 Consequently, we are opposed to this particular development proposal and wish to register our strong objections to it. Its siting is inconsistent with government policy and would have a material and adverse impact on the amenity of local residents and those passing through Coombe Bissett and the surrounding areas.
- 1.3 Below is an executive summary of our objections. Each of these issues is considered in more detail below.
 - (a) the land on which the solar park is proposed appears to be amongst our "best and most versatile" agricultural land. A development on such land should only be approved after the most careful consideration, and is clearly contrary to the thrust of recent government planning policy statements. It is notable that the applicants have not in their new application sought to respond to questions raised about the designation of the land. It is also notable that the land being taken out of agricultural use has risen from 28.5 hectares in the previous application to 40.2 hectares in the new one;
 - (b) the land is in a Special Landscape Area and is directly adjacent to an Area of Outstanding Natural Beauty. It is clearly visible from a Site of Special Scientific Interest, and from numerous residences, community buildings and vantage points over a wide area. It would have a materially detrimental effect on the local landscape character and the visual amenity of the area. The new application does appear to be less harmful than the previous one, but it will still have adverse effects. The applicants have not made the case as to why the proposed degree of adverse effects should be imposed on the local community;
 - (c) inadequate consideration has been given to health and safety, crime and security, flooding, noise and general disturbance and ecological issues. Given the scale of the development, all of these should be considered in greater depth before any approval could be contemplated. Whilst the new report on the noise impact is of interest, it is limited in its scope and directly contradictory to the applicant's previous assertions about noise impact.
- 1.4 Either of the first two objections should in isolation be sufficiently serious to justify the rejection of the application. Taken together, it is hard to see how the application could reasonably be approved. The revised application may have lessened the adverse visual impact of the proposal, but it is still material. The revised application has significantly increased the land that is to be taken out of agricultural use.
- 1.5 Even if the Council is minded to approve the application, we do not see how it can do so without very much more extensive investigations and further community engagement.
- 2 Overview of proposal**
- 2.1 The proposed development is of a solar PV park on 40.2 hectares of arable land 2 miles outside Salisbury and 700 metres from the centre of Coombe Bissett village. 28.65 hectares is the equivalent of 56 football pitches.

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ADDITIONAL CORRESPONDENCE
SOUTHERN AREA PLANNING COMMITTEE 16th October 2014

- 2.2 The development will comprise solar arrays built 2.608 metres above ground in a regular geometric layout. In addition, the following buildings will be constructed on the development site:
- (a) seven inverter stations, which are now considerably longer in the current revised application than proposed in the original application: 11.98 metres long by 2.92 metres wide and up to 2.98 metres high. Each is the equivalent of two single garages, placed end to end, or half the length of a railway carriage. So, in total, the inverter stations comprise the equivalent of 14 single garages or a four carriage train;
 - (b) a private switchgear cabin, 5.58 metres long by 3.036 metres wide by 3.11 metres high; and
 - (c) a building containing electrical switchgear for the Local Electricity Distribution Network Operator. This will be 6 metres long by 3 metres wide and 3.277 metres high.
- 2.3 Surrounding the arrays and the industrial buildings will be:
- (a) fencing 2.028 metres high consisting of a wire mesh; and
 - (b) seven galvanised steel poles six metres high topped with CCTV cameras.
- 2.4 As stated in the comments from the local Area of Outstanding Natural Beauty board, the proposal is for a major industrial development. It is a power station built in the country side.
- 2.5 Amongst the reasons given by the application for the site selection are that the land:
- (a) does not lie within national landscape designations;
 - (b) does not lie within, nor is it in close proximity to, an ecological designation;
 - (c) distances from the nearest residential properties are such that potential noise and substantial residential amenity impacts can be avoided;
 - (d) site has lower (grade 3) agricultural land classification; and
 - (e) existing boundary hedgerows provide a good degree of existing visual screening.
- 2.6 We provide further commentary on each of these site selection criteria below.

3 Policy framework

- 3.1 Chapter 5 of the Environmental Statement sets out the policy framework for the application in some detail, but somewhat selectively. It fails to put adequate weight on policy provisions designed to protect agricultural land and community amenity, and omits entirely key aspects of policy. We therefore set out the policy framework in some detail.
- 3.2 The application of the policy framework to this particular development is considered in subsequent sections of this letter.

National Planning Policy Framework

- 3.3 Chapter 5 of the applicant's Environmental Statement refers extensively to the National Planning Policy Framework (NPPF) published by the Department of Communities and Local

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Government in March 2012. The Environmental Statement cites those provisions encouraging renewable energy projects, but only refers briefly to those provisions designed to protect our agricultural assets. To redress this balance, we cite below the additional provisions of the NPPF which we think the Council should have regard to¹:

- (a) *"The planning system should contribute to and enhance the natural and local environment by . . . protecting and enhancing valued landscapes"* (para 109)
- (b) *"In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework"* (para 110)
- (c) *"Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality"* (para 112)
- (d) *"Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification."* (Annex 2, Glossary)
- (e) *"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas"* (para 115)
- (f) *"Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of . . . any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated"* (para 116)
- (g) *"proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted"* (para 118)
- (h) *"Planning policies and decisions should aim to:*
 - *avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;*
 - *mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions"* (para 123)

Planning Practice Guidance for Renewable and Low Carbon Energy

¹ Citations in this letter may not be full. We have attempted to cite only the relevant language, without distorting the meaning of the relevant provisions. Ellipses indicates where words are omitted from within a citation (though not at the beginning and end of a citation).

3.4 The applicant's Environmental Statement cites the latest Planning Practice Guidance for Renewable and Low Carbon Energy. The guidance set out on the National Planning Policy Framework is very high level, and the we believe the form guidance (PPGRLCE) published by the DCLG in July 2013 remains significant. This former guidance was quoted extensively, but selectively in the applicant's last application; we seek to redress the balance below with some extracts which are less helpful to the applicant's case:

- (a) *"The National Planning Policy Framework explains that all communities have a responsibility to help increase the use and supply of green energy, but this does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of the local communities. As with other types of development, it is important that the planning concerns of local communities are properly heard in matters that directly affect them"* (para 5)
- (b) *"There are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology (paragraphs 12-13) and, critically, the potential impacts on the local environment, including form cumulative impacts (paragraphs 43-44). The views of local communities likely to be affected should be listened to"* (para 8)
- (c) *"landscape character areas could form the basis for considering which technologies at which scale may be appropriate in different types of location. Landscape Character Assessment is a process used to explain the type and characteristics of landscape in an area. Natural England has used Landscape Character Assessment to identify 159 National Character Areas in England which provide a national level database. Landscape Character Assessment carried out at a county or district level may provide a more appropriate scale for assessing the likely landscape and visual impacts of individual proposals"* (para 9)
- (d) *"Where a planning application is required, factors to bear in mind include . . . effect on protected areas such as an Area of Outstanding Natural Beauty or other designated areas"* (para 25) [This relates specifically solar technology]
- (e) *"The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in very undulating landscapes. However, the visual impact of a well-planned and well-screened solar far can be properly addressed within the landscape if planned sensitively"* (para 26)
- (f) *"Particular factors a local planning authority will need to consider include:*
 - *encouraging the effective use of previously developed land*
 - *the effect on landscape of glint and glare and on neighbouring uses and aircraft safety;*
 - *the need for, and impact of, security measures such as lights and fencing;*
 - *great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical appearance but also from its setting, careful consideration should be given to the impact of large scale solar farms on*

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such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset" (para 27)

- (g) *"In assessing the impact on visual amenity, factors to consider include: establishing the area in which a proposed development may be visible, identifying key viewpoints, the people who experience the views and the nature of the views" (para 41, applied to solar farms by para 28)*
- (h) *"When assessing the significant of impacts a number of criteria should be considered including the sensitivity of the landscape and the visual resource and the magnitude or size of the predicted change. Some landscapes may be more sensitive to certain types of change than others" (para 42, applied to solar farms by para 28)*

3.5 The applicant's quotes from the most recent Planning Policy Guidance is also selective. It fails to cite the reference to Gregory Barker's letter (see below) or to draw the Council's attention to considerations relating to wind turbines which are also explicitly stated to be applicable to solar farms:

- (a) *"where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays. See also a speech by the Minister for Energy and Climate Change, the Rt Hon Gregory Barker MP, to the solar PV industry on 25 April 2013"*
- (b) *"The approach to assessing cumulative landscape and visual impact of large scale solar farms is likely to be the same as assessing the impact of wind turbines. However, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero."*
- (c) *"How should cumulative landscape and visual impacts from wind turbines be assessed?"*

Cumulative landscape impacts and cumulative visual impacts are best considered separately. The cumulative landscape impacts are the effects of a proposed development on the fabric, character and quality of the landscape; it is concerned with the degree to which a proposed renewable energy development will become a significant or defining characteristic of the landscape.

Cumulative visual impacts concern the degree to which proposed renewable energy development will become a feature in particular views (or sequences of views), and the impact this has upon the people experiencing those views. Cumulative visual impacts may arise where two or more of the same type of renewable energy development will be visible from the same point, or will be visible shortly after each other along the same journey. Hence, it should not be assumed that, just because no other sites will be visible from the proposed development site, the proposal will not create any cumulative impacts."

- (d) *"What information is needed to assess cumulative landscape and visual impacts of wind turbines?"*

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challenge of protecting the high quality of the built and natural environment'
(para 3.11) [Please note that the section in italics was included in the Environmental Statement. The immediately following sentence in bold italics was not.]

- (g) *"Core Strategy Spatial Vision: By 2026 south Wiltshire will be a thriving and vibrant area, where people can learn and develop their skills, enjoy a good quality of life and good health in a safe, clean neighbourhood, appreciate a superb environment which makes the most of the natural and historic landscapes, together with historic buildings and complements them with exciting new buildings"* (para 4)
- (h) ***"Strategic Objective 5: To deliver new buildings which conserve and complement vernacular traditions and maintain and where possible enhance the built and natural environment. This Strategy sets out a proactive policy framework, which seeks to ensure a consistent delivery of high quality, well designed buildings and spaces, ensuring they sit comfortably in south Wiltshire. It strikes an effective balance between allowing the sustainable growth needed to provide local housing, jobs and services, while ensuring that the natural environment and built environment is not compromised . . . Salisbury's historic roofscape and spire views will have been maintained"*** (para 4.6)
- (i) ***"While identifying the location for new development is extremely important, it is also vital to ensure buildings are as energy efficient as possible to help combat climate change. To address this latter issue there has been an assessment as to whether there are specific circumstances that merit the setting of local targets for reducing carbon emissions, or the use of alternative local energy sources, that go beyond national and regional targets. Evidence demonstrates that the South West region as a whole is characterised by high aspiration but a general failure to meet national targets (e.g. 10% of electricity to be generated from renewable sources by 2010)"*** (para 5.58) [Please note that the section in italics was included in the Environmental Statement. The remaining language in bold italics was not.]
- (j) *"In addition part of this Community Area is also located within the Cranborne Chase and West Wiltshire Downs AONB. Within the AONB particular attention will be placed on the preservation of the character and scenic quality of the environment. Where proposals come forward emphasis will be placed on their scale, location, siting, design, materials and landscaping. Where possible, proposals should aid the delivery of the AONB Management Plan. Applications for development within and adjoining the AONB should have regard to the AONB Landscape Character and Historic Landscape Character Assessments"* (para 9.18)

Wiltshire Core Strategy

- 3.7 The Environmental Statement refers to the draft Wiltshire Core Strategy. Again, it cites from this selectively. For example, it cites the key principle relating to renewable energy (para 5.57 of the Environmental Statement), but not the next key principle:

"Protecting and planning for the enhancement of the natural, historic and built environments, wherever possible, including maintaining, enhancing and expanding Wiltshire's network of green infrastructure to support the health and wellbeing of communities." (para 1.3)

- 3.8 Again, the Environmental Statement refers to South Wiltshire's low contribution of renewable electricity, but does not refer to the following a few paragraphs later:

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"The Core Strategy will need to ensure that Wiltshire's high quality built and natural environment is adequately protected, and that opportunities to enhance these significant assets are optimised. However it needs to go further and set out a proactive approach through which Wiltshire's rich environments and heritage will be managed to act as a catalyst for the realisation of this strategy and not a barrier to it. This means the careful stewardship of our environmental assets so that growth is complimentary and does not erode the very qualities that make Wiltshire so attractive in the first place. Simply put, a key challenge for the Core Strategy is to set out how protection of these environments will be achieved in a way which supports a positive strategy for growth, as they form the very heart of what Wiltshire has to offer to investors, visitors and the community" (para 2.17)

3.9 Other relevant provisions of the core strategy are set out below. These include a core policy directly relevant to the application that has not been cited:

- (a) *"The development of most standalone renewable energy installations within Wiltshire will require careful consideration due to their potential visual and landscape impacts, especially in designated or sensitive landscapes, including AONBs and the Stonehenge and Avebury World Heritage Site and its setting. Core policies 51 and 59, which relate to landscape and the World Heritage Site, should be considered alongside this policy. The size, location and design of renewable energy schemes should be informed by a landscape character assessment, alongside other key environmental issues as set out in Core Policy 42. This should help reduce the potential for conflict and delay when determining planning applications" (para 6.38)*

(b) **"Core Policy 51**

Landscape

Development should protect, conserve and where possible enhance landscape character and must not have an unacceptable impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been considered:

- (i) the locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies*
- (ii) the locally distinctive character of settlements and their landscape settings*
- (iii) the separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe*
- (iv) visually sensitive skylines, soils, geological and topographical features*
- (v) landscape features of cultural, historic and heritage value*
- (vi) important views and visual amenity*

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(vii) *tranquillity and the need to protect against intrusion from light pollution, noise, and motion and*

(viii) *landscape functions including places to live, work, relax and recreate.*

Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall have regard to the relevant Management Plans for these areas. 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 natural beauty, must also demonstrate that it would not adversely affect its setting."

Landscape Character Assessments

- 3.10 The PPGRLCE and the Wiltshire Core Strategy refer to Landscape Character Assessments, Landscape Character Assessments are defined as follows:

"The tool that is used to help us to understand, and articulate, the character of the landscape. It helps us identify the features that give a locality its 'sense of place' and pinpoints what makes it different from neighbouring areas." (Landscape Character Assessment: Guidance for England and Scotland, The Countryside Agency and Scottish Natural Heritage, 2002) [Quoted from Natural England's website]

Recent government policy statements relating to solar PV

- 3.11 We refer below to key elements of the government's most recent policy statements on solar PV. These are selectively quoted in the Environmental Statement. The extracts below make clear the government's increasing concern about solar farms being constructed on agricultural land, and the impact on local communities.

UK Solar PV Strategy Part 1: Roadmap to a Brighter Future

- 3.12 UK Solar PV Strategy Part 1: Roadmap to a Brighter Future was published in October 2013. Key aspects in support of our objection are cited below:

(a) *"But big ambition must also be matched by a much greater sensitivity to impacts on landscape, visual amenity and biodiversity. Local communities must be willing partners in solar expansion; not just consulted but respected and where ever possible, financial partners in local projects"* Foreword by Greg Barker MP, Minister of State for Energy and Climate Change

(b) *"This Roadmap set out four guiding principles, which form the basis of Government's strategy for solar PV . . .*

III. Support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity, and provide opportunities for local communities to influence decisions that affect them" (para 6)

(c) *"The UK's planning regimes include robust safeguards to ensure that developments, including solar PV installations, are properly sited and that individuals, communities and the landscape itself are protected against any unacceptable impacts. This means that issues such as visual amenity, land use and other environmental impacts are an important consideration within the planning process"* (para 58)

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- (d) *"The revised guidance on renewables provided planners with more specific guidance on issues that they should consider in relation to large-scale solar PV planning applications. The revised guidance makes clear that the need for renewable energy does not automatically override the need for planners to properly scrutinise the effects of renewables deployment. It underlines the need for planners to ensure that the impacts of proposed renewable energy deployments are acceptable, including impact on visual amenity and effects on cultural and heritage landscapes"* (para 60)

UK Solar PV Strategy Part 2: Delivering a Brighter Future

3.13 UK Solar PV Strategy Part 2: Delivering a Brighter Future was published in April 2014. Key aspects in support of our objection are cited below:

- (a) *"Large-scale ground-mounted solar deployment has been much stronger than anticipated in government modelling. This can have impacts on visual amenity, and siting and design are important. It also has the potential to affect the financial incentives budget under the Levy Control Framework. Given the finite nature of this budget it will be necessary for the Government to continue to monitor the overall pipeline of projects against our ambitions for a diverse mix of renewable technologies and achieving value for money for consumers."* (para 17)
- (b) *"While large-scale solar farms provide opportunities for greater generation, they can have a negative impact on the rural environment if not well-planned and well-screened. There can also be problems where local communities see no benefit but consider that they bear amenity issues. The Solar Trade Association has developed a statement of "10 Commitments" for solar farm developers (see box) which seeks to ensure that the impact of large-scale solar farms on communities, visual impact and long-term land use are minimised. In addition, the National Solar Centre is publishing two best practice guides on the development of large-scale solar farms. The first of these is on the factors that developers should consider in the design and installation of large-scale solar farms. The second is a guide to enhancing the biodiversity benefits from ground-mounted solar PV."* (64)
- (c) *"These best practice initiatives [e.g. Solar Trade Association's 10 Commitments] are important as they help address the perception that solar farms are diverting significant amounts of land from agricultural use and domestic food production. This, alongside the effects on the landscape and communities of the rapid growth in the deployment of large-scale solar PV installations, might erode public support for the sector overall."* (para 67)
- (d) *"DECC will promote DCLG's planning guidance on large-scale solar farms. The guidance sets out particular considerations for solar farms, such as their visual impact, and underlines that is important that the planning concerns of local communities are properly heard in matters that directly affect them."* (para 71)
- (e) *"DECC will continue to work with industry to promote industry best practice standards, including the STA's 10 commitments and the NSC's biodiversity guidance, to ensure deployment is sympathetic to the countryside."* (para 72)

Letter from Minister

3.14 Greg Barker MP, Minister of State for Energy and Climate Change, wrote to council leaders on 1 November 2013. Key extracts are cited below:

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- (a) *"I am keen for the focus of growth to be firmly on domestic and commercial roof space and previously-used land."*
- (b) *"I am very aware of concerns raised by the public about the potential growth of large-scale solar farms, particularly where approval does not appear to take full account of the latest planning guidance. Such inappropriately sited solar PV is something that I take extremely seriously and am determined to crack down on"*
- (c) *"proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration"*
- (d) *"protection of local amenity is an important consideration which should be given proper weight in planning decisions"*
- (e) *"a full Solar PV Strategy will be published in spring 2014 but in the meantime we will continue to closely monitor solar PV to assess whether additional measures are needed to ensure that it is deployed in a way that is consistent with the vision I have set out and not sited in inappropriate parts of the countryside"*

Guidance from trade bodies

- 3.15 The Environmental Statement does not (from what we have read) refer to the Building Research Establishment's National Solar Centre's guidance to planners on large-scale solar PV developments, published in 2013. Key extracts are cited below:
- (a) *"Ground Mounted Solar PV projects, over 50kWp, should ideally utilise previously developed land, brownfield land, contaminated land, industrial land or agricultural land preferably of classification 3b, 4, and 5 (avoiding the use of "Best and Most Versatile" cropland where possible). Land selected should aim to avoid affecting the visual aspect of landscapes, maintain the natural beauty and should be predominantly flat, well screened by hedges, tree lines, etc and not cause undue impact to nearby domestic properties or roads." (intro to section 2) [Note that the Bake Farm development is not over 50kWp, but the principles should still apply]*
 - (b) *"Ideally ground mounted large scale PV arrays should utilise previously developed land, brownfield land, contaminated land, industrial land or agricultural land preferably of classification 3b, 4 or 5. Whilst there is no ban prohibiting ground mounted large scale PV arrays on sites classified agricultural 1, 2 and 3a or designated for their natural beauty or acknowledged/ recognised ecological/ archaeological importance/ interest it is unlikely that planning permission will be granted where there is significant impact on these designations." (page 6)*
 - (c) *"Policing experience indicates that placing large quantities of expensive photovoltaic panels in isolated locations without adequate protection will attract criminals and the photovoltaic panels and associated infrastructure will be stolen. The main risk will come from organised gangs who will use heavy duty tools and vehicles to remove large quantities of the panels. Stolen the panels are likely to be moved from the crime scene before re-emerging for sale." (page 12)*
 - (d) *"The landscape / visual impact of a solar PV farm is likely to be one of the most significant impacts of such development. Developers may be attracted to southerly sloping sites, where solar gain is greatest. However such sites may be of high*

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agricultural value and are likely to be more visible within the wider landscape." (page 14)

- (e) *"Solar PV panels are designed to absorb, not reflect, irradiation. However the sensitivities associated with glint and glare, and the landscape/ visual impact and the potential impact on aircraft safety, should be a consideration. In some instances it may be necessary to seek a glint and glare assessment as part of a planning application"* (page 17)

- 3.16 The Environmental Statement does not (from what we have read) refer to the Solar Trade Association's ten commitments published in August 2013. The introduction and first two of these commitments are as follows:

"Solar farm developers, builders or tenants who are members of the STA will comply with the following best practice guidance:

- 1. We will focus on non-agricultural land or land which is of lower agricultural quality.*
- 2. We will be sensitive to nationally and locally protected landscapes and nature conservation areas, and we welcome opportunities to enhance the ecological value of the land."*

- 3.17 If our understanding is correct that the Environmental Statement does not refer to the views expressed by trade bodies, this is particularly surprising given the support expressed by the government for these interventions in reports that are otherwise extensively cited by the applicant.

4 Inappropriate use of productive agricultural land

- 4.1 We object in principle to the proposed development as it represents an inappropriate use of agricultural land; the use of the land should not change.
- 4.2 The land on which the power station would be constructed is currently under arable cultivation. It was previously used for grazing and wheat production. There are no buildings currently on the land.
- 4.3 The National Planning Policy Framework states follows: *"Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality"* (para 112).
- 4.4 The Planning Policy Guidance says: *"where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays."*
- 4.5 The South Wiltshire Core Strategy says: *"The challenge faced is balancing the protection of the countryside, especially the best and most versatile agricultural land for food production, with recognising the world is changing and hence allowing farmers more freedom to diversify their activities into business not directly related to agriculture and to re-use redundant farm buildings for economically viable alternatives"* (para 3.4(g))

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- 4.6 Greg Barker MP, Minister of State for Energy and Climate Change, explained to Council leader's: *"I am keen for the focus of growth to be firmly on domestic and commercial roof space and previously-used land."*
- 4.7 The National Solar Centre's guidance states that:
- (a) *"Ideally ground mounted large scale PV arrays should utilise previously developed land, brownfield land, contaminated land, industrial land or agricultural land preferably of classification 3b, 4 or 5. Whilst there is no ban prohibiting ground mounted large scale PV arrays on sites classified agricultural 1, 2 and 3a or designated for their natural beauty or acknowledged/ recognised ecological/ archaeological importance/ interest it is unlikely that planning permission will be granted where there is significant impact on these designations."* (page 6)
- (b) *"The landscape / visual impact of a solar PV farm is likely to be one of the most significant impacts of such development. Developers may be attracted to southerly sloping sites, where solar gain is greatest. However such sites may be of high agricultural value and are likely to be more visible within the wider landscape."* (page 14)
- 4.8 The Solar Trade Association has committed that:
- "Solar farm developers, builders or tenants who are members of the STA will comply with the following best practice guidance:*
- 1. We will focus on non-agricultural land or land which is of lower agricultural quality.."*
- 4.9 The applicant accepts that the land has an agricultural land classification of Grade 3. The Environmental Statement suggests that a classification of Grade 3 *"indicates a lower quality of land"*. This is not the position as we understand it. Grade 3 is divided between Grade 3(a) and Grade 3(b). Grade 3(a) is classed as the "best and most versatile" agricultural land.
- 4.10 Giles Frampton of the applicant and a colleague of his stated at a public meeting called by the Coombe Bissett and Homington Parish Council on 16 December 2013 that the applicant is not aware whether the solar farm site is classified as Grade 3(a) or 3(b), and that the applicant would need to do further analysis to determine this. The meeting was told that separate Grades 3(a) and 3(b) were now outmoded and implied that any Grade 3 land was appropriate for this sort of development. This is not our understanding. The two sub-grades within Grade 3 are clearly referred to in the National Planning Policy Framework of March 2012, and in the National Solar Centre's guidance of 2013. We have found no record of the fundamental change in policy to which Mr Frampton and his colleague alluded.
- 4.11 It seems astonishing that the applicant should not actually know, or be required by the Council to declare, the agricultural land classification of the development site. This issue was raised in our previous objection to the initial proposal. We can think of no positive reason why the applicant would not have sought to address it, particularly given the further months of preparation that have gone into the current revised application.
- 4.12 However, what is clear from the current and past uses of the land that it has been used for both arable (i.e. food production and oil seed rape) and grazing. It is clearly versatile and, we assume, good quality. We also note that it is on a south facing slope which is, we understand, a further indicator of the quality of the land.

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- 4.13 The land would be taken out of arable use for at least 25 years, and possibly longer. The potential for grazing sheep under the solar PV panels is no substitute for current use of the land for intensive arable production.
- 4.14 The Council no doubt has the resources to determine definitively whether the land is Grade 3(a) or 3(b). Even if it is officially classified as Grade 3(b), it seems to have all of the characteristics of Grade 3(a) land.
- 4.15 The policy framework set out both in the applicant's Environmental Statement and in paragraph 3 above makes clear that solar PV parks proposed to be constructed on our best and most versatile agricultural land should be considered very carefully. The guidance from both the government and reputable trade bodies is that solar PV parks should be on previously used land, not the best agricultural land. The preservation of land used for food production is quite rightly a key objective in south Wiltshire.
- 4.16 As well as the objection in principle to best and most versatile agricultural land being used for an industrial purpose, the other grounds for objection set out below should be taken into account. There are a range of reasons why this development should not be approved.
- 4.17 There appear to be no reasons (except perhaps fiscal) why a solar PV development should be approved on this prime agricultural land, particularly given that the site area has now considerably increased in size since the original application. Apart from being south facing, having good exposure to sunlight and being near to a national grid power lines, there are no compelling reasons why agricultural land should be sacrificed to this industrial development.
- 4.18 The Environmental Statement repeatedly refers to Bake Farm as being the most suitable site for a solar PV farm in the local area. It does not provide any detailed analysis of other sites reviewed. Nor, even more importantly, does it say why a solar PV farm is required in the local area. Vague statements in support of renewable energy are wholly inadequate justifications for taking over 40 hectares of land out of arable production.
- 4.19 In short, as a matter of principle the use of agricultural land such as that at Bake Farm should not be changed. There are no compelling reasons why this principle should not be applied in respect of this development proposal.

5 Landscape character

- 5.1 The Environmental Statement contains a helpful statement of the current landscape character of the area in which the solar park is proposed:
- "The wider area is rural and comprises of pasture, arable fields, woodland belts, with occasional scattered agricultural buildings and dwellings. Land uses in the immediate surrounding area consist of large to medium scale pasture and arable fields, woodland blocks and belts, some soft fruit production at Bake Farm to the south-east and the village of Coombe Bissett itself to the south west"* (para 2.7)
- 5.2 As the summary makes clear, the proposed development is sited in an agricultural area of high scenic value with no other industrial developments (other than agricultural buildings) and very few modern buildings at all.
- 5.3 The land on which the development is proposed is, importantly, within the Ebbles Broad Chalk River Valley Slopes Landscape Character Area. The landscape character would be disproportionately affected, and quite substantially blighted, by the development if it is approved.

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- 5.4 We consider in subsequent sections considerations particular to the neighbouring AONB and SSSI, and views towards Salisbury Cathedral spire. Irrespective of these specific considerations, the proposal will have a highly negative impact on the landscape character and consequent community amenity.
- 5.5 The National Planning Policy Framework emphasis the importance of "*protecting and enhancing valued landscapes*".
- 5.6 The Planning Practice Guidance for Renewable and Low Carbon Energy states:
- (a) "*landscape character areas could form the basis for considering which technologies at which scale may be appropriate in different types of location . . . Landscape Character Assessment carried out at a county or district level may provide a more appropriate scale for assessing the likely landscape and visual impacts of individual proposals*" (para 9)
- (b) "*When assessing the significant of impacts a number of criteria should be considered including the sensitivity of the landscape and the visual resource and the magnitude or size of the predicted change. Some landscapes may be more sensitive to certain types of change than others*" (para 42, applied to solar farms by para 28)
- 5.7 Core Policy 51 of the draft Wiltshire Core Policy states that: "*Development should protect, conserve and where possible enhance landscape character and must not have an unacceptable impact upon landscape character*". It also emphasises the need to protect "*important views and visual amenity*".
- 5.8 The UK Solar PV Strategy, the most significant recent statement of government policy, states that "*big ambition must also be matched by a much greater sensitivity to impacts on landscape, visual amenity and biodiversity*". One of its core principles is that: "*Support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity*".
- 5.9 It goes on to say that: "*The UK's planning regimes include robust safeguards to ensure that developments, including solar PV installations, are properly sited and that individuals, communities and the landscape itself are protected against any unacceptable impacts. This means that issues such as visual amenity, land use and other environmental impacts are an important consideration within the planning process*".
- 5.10 The Solar Trade Association has committed that:
- "Solar farm developers, builders or tenants who are members of the STA will comply with the following best practice guidance:*
- . . .
- 2. We will be sensitive to nationally and locally protected landscapes and nature conservation areas, and we welcome opportunities to enhance the ecological value of the land."*
- 5.11 Irrespective of the particular considerations relating to the neighbouring AONB and SSSI, the visual amenity of the beautiful local landscape must be taken into account.
- 5.12 Despite the changes to the proposed site, the LVIA report acknowledges it will still be clearly visible from a range of crucial vantage points, from the Coombe Bissett hillside opposite (including a number of houses in Coombe Bissett), the Coombe Bissett Village Hall and

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Recreation Area, Old Blandford Road, and the Salisbury-Blandford Road (A354) as it approaches the village (both from Harnham Hill and from the south), as well as various footpaths, including from Old Shaftesbury Drove, Coombe Bissett Nature Reserve, Homington and Odstock Downs.

- 5.13 The LVIA methodology attempts to assess the impact of the solar farm at these vantage points in terms of receptor sensitivity and magnitude of change, but we have struggled to understand how the report's conclusions can represent any accurate measurement of the impact, particularly for the local community who enjoy these vantage points on a daily basis. For example, the solar farm will be clearly visible from the A354 Salisbury Road as it leaves East Harnham (Viewpoint 16 in Appendix 6.1) and the LVIA report says the "sensitivity of travellers is considered to be Medium/Low and the magnitude of change Low since it will be a fleeting glimpse ... the visual impact will be adverse of Minor/Negligible significance". We travel this route to/from home several times a day – as a local resident and not merely a 'traveller' - and on every occasion I enjoy this viewpoint as the first sight of peaceful, open, green fields on leaving Salisbury: the adverse impact would not be negligible on those journeys should the site proceed. The visual impact acknowledged at this particular viewpoint, and from Harnham Hill, also directly contradicts the applicant's claim that the "perception of the rural area as seen from Salisbury will, therefore, not be altered" (6.181).
- 5.14 The LVIA report appears to significantly underestimate the extent to which this industrial development would intrude on the surrounding landscape. Despite this, the LVIA itself acknowledges that:
- (a) there are significant public areas to the south and east of the site where there will be a significant visual impact should the site be operational (Appendix 6.1, Figure 6.3)
 - (b) of the 19 local viewpoints of the site in the Environmental Statement, 68% are classified as High visual receptor sensitivity and 26% as Medium visual receptor sensitivity, due to the site being located on a gentle slope overlooked by mostly high sensitivity locations (Table 6.1; 6.152)
 - (c) the proposed development will cause an "adverse effect of major significance" to the landscape character of the site, as it changes from agricultural land to large electrical infrastructure (6.173)
 - (d) the development will be visible from the surrounding landscape and "affect the landscape character beyond the site" (6.174)
 - (e) the site will cause "direct character changes" to the LCA B2 - Ebble Broad Chalk Valley Slopes Area (6.175)
 - (f) the site will cause "alteration of perception and reduction of tranquillity" to the LCA D7 – Cranborne Chase Chalk Downlands Area (6.178)
 - (g) users of the popular Old Blandford Road track will be confronted with a view of a considerable area of the site, with Salisbury and the Cathedral forming the backdrop, judged by the applicant to be of Moderate visual impact (6.218)
 - (h) those using the adjacent AONB will experience "a minor adverse effect" (6.224)
 - (i) users of the nearby Special Landscape Area will suffer an "adverse effect but of minor significance (6.226)

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- (j) those using the Harnham Hill public right of way (walkers and residential properties) will be confronted with visual impact of Moderate significance (6.216); and
 - (k) the users of very popular community resources, Coombe Bissett Village Hall and Nature Reserve, will suffer Major/Moderate adverse visual impact for at least 10 years (6.204, 6.207)
- 5.15 The development will be visible from Drove Lane itself and Old Shaftesbury Drove. Drove Lane is popular with walkers and cyclists. It is no-through road, so a relatively safe road for walkers with dogs and for children on bicycles. It leads to a ridge from which there are spectacular views over the Salisbury racecourse and golf course to the City of Salisbury and the Cathedral. Old Shaftesbury Drove is also a popular walking route – our family has walked from our house to Salisbury along Old Shaftesbury Drove. The proposed development would be visible from Drove Lane and Old Shaftesbury Drove itself.
- 5.16 Of the view from Drove Lane (Viewpoint 10 in Appendix 6.1), the LVIA says the receptor sensitivity is High but the magnitude of change Low resulting in Minor adverse effect. Firstly, Drove Lane marks the start of the AONB area and the LVIA methodology refers to views from AONB as Very High receptor sensitivity. In addition, as with other viewpoint assessments, the minor adverse conclusion is not substantiated in the report: we walk this route regularly and enjoy the unspoilt rural views, and consider the impact will be more than minor due to the very close proximity of the solar panels and inverter stations to Drove Lane, and the fact that the hedges here are patchy, unkempt and contain gaps. We would dispute that those within this part of the AONB will not be able to see the array or perceive its industrial character (as claimed at 6.222), particularly in Autumn, Winter and Spring.
- 5.17 The nature of the proposed development site means that it is very difficult for the applicant to effectively integrate the development into the landscape. It is south facing, opposite a large hill and at the end of a valley. By reason of its size, positioning, flat and unvarying character and the scope for glare and reflection, the site will have a major impact on the local landscape. It will appear as a uniform, grey/black or dark scar on the hillside, rather like an enormous oil slick. Representing the appearance of the solar panels from a distance as blue or silver and like an unusual crop is, we believe, highly misleading. The appearance will (obviously) not change with the seasons, and it will in any season represent a stark and ugly contrast to the beauty of the surrounding area.
- 5.18 The Salisbury District Council's Landscape Character Assessment summarises the area as having *"a generally simple landscape pattern and there is generally a strong sense of openness throughout"*. It goes on to state *"the natural landform of this landscape has retained its distinctive form and strong sense of intactness and continuity"*. This further illustrates how intrusive the solar park would be.
- 5.19 Addressing development in particular, it states: *"the shallow slopes and contrasting deep chalk coombes are particularly sensitive to landscape change since their relatively open character and simple landscape pattern would be easily disrupted by inappropriate development or changing land uses and because the entire landscape is highly visible in views from adjacent enclosing ridgetops. Overall visual sensitivity is therefore considered to be moderate to high."*
- 5.20 This assessment reads as if the author was anticipating the harm that a development of the type applied for would cause. It should be remembered that the Planning Practice Guidance for Renewable and Low Carbon Energy states: *"landscape character areas could form the basis for considering which technologies at which scale may be appropriate in different types of location"*.

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- 5.21 As is very clear from the photomontages in the LVIA Appendix 6.1, the applicant's attempts at masking the site with hedge management and additional planting will fail to mitigate materially the negative impact of the development, and will in any event have little - if any - practical impact for several years. Effective vegetation management is subject to all sort of variables, including environmental and climate factors, and therefore cannot be guaranteed by either the applicant or the Council or compensate for the likely landscape and visual impact of this development. Even if all the variables are favourable, the fact that much of the mitigation will take 5-7 years or even 12-15 years to mature (see 6.252) means that there is actually no mitigation for a considerable chunk of the site's 25-year lifespan.
- 5.22 We also consider that the Council should give serious consideration to the potential for glint and glare from the site (see paragraph 9 below). Any glint and glare from the solar arrays would make the development even more intrusive than were it simply a unnatural, dark monstrosity.
- 5.23 The overbearing, out of scale, out of character and intrusive aspect of the solar park will very materially diminish the amenity of many of the villagers and those passing through the area to enjoy the local landscape and views. Those of us that enjoy walking and cycling in the area will have the dark scar of the solar arrays overlooking us from a range of vantage points.
- 5.24 The applicant suggests that the impact on visual amenity will be relatively minor. We do not accept that. Further, we believe that taken with the other relevant planning policy considerations, the fact that there is *any* impact on visual amenity is highly significant.
- 5.25 Coombe Bissett is a beautiful, comparatively unspoilt rural area adjoining an AONB. The views from the village, and its surrounding areas, are a significant amenity to the community. The solar farm will have a materially negative affect on the landscape character of the area.

6 Impact on AONB

- 6.1 We commend to the Council the consultation response submitted by the Cranborne Chase & West Wiltshire Downs (CCWWD) Area of Outstanding Natural Beauty on 10 September 2014.
- 6.2 The land on which the development is proposed is adjacent to the CCWWD AONB boundary, which follows Drove Lane (on which we live). The site abuts the boundary of the AONB.
- 6.3 Views from the AONB will be materially affected by the development. What is currently an unbroken line of beautiful rural landscape views will have a very substantial scar of industrial development clearly visible on its edges.
- 6.4 The policy framework set out both in the applicant's Environmental Statement and in paragraph 3 above makes clear that particular attention must be given to applications that are in or near an AONB.
- 6.5 Specifically in relation to the CCWD AONB, the South Wiltshire Core Strategy says at para 9.18: "*Applications for development within and adjoining the AONB should have regard to the AONB Landscape Character and Historic Landscape Character Assessments*".
- 6.6 Core policy 51 of the draft Wiltshire Core Strategy states that: "*Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFP) or Stonehenge and Avebury World Heritage Site (WHS) shall have regard to the relevant Management Plans for these areas. 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 natural beauty, must also demonstrate that it would not adversely affect its setting.*"

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- 6.7 The National Planning Policy Framework says: "*Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas*" (para 115).
- 6.8 Planning Practice Guidance for Renewable and Low Carbon Energy states, specifically in relation to solar developments: "*Where a planning application is required, factors to bear in mind include . . . effect on protected areas such as an Area of Outstanding Natural Beauty or other designated areas*" (para 25).
- 6.9 Greg Barker's letter to council leaders makes this point again: "*proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration*".
- 6.10 The applicant's Environmental Statement quotes at para 6.93 the AONB Management Plan as stating that "*where visible from the AONB, the surrounding landscape, which is often of significant landscape value, in an important element of the AONB's natural beauty*". It then quotes at para 6.96: "*A similar situation exists on the edge of an AONB, especially where the landscapes and landforms link and, visually or functionally, join the surrounding to the AONB. Proposals for change in the setting should, therefore, have regard to the inter-relationship with the AONB and the landscape character and qualities*".
- 6.11 Whilst the proposed development is not within an AONB, it immediately adjoins one and will be visible from key vantage points within the AONB. It would have a materially detrimental effect on the amenity of the AONB and those seeking to enjoy it. The application appears to have barely considered the implications for the AONB despite relevant policy clearly anticipating the impact of development proposals outside, but affecting, an AONB.
- 6.12 The viewpoints provided by the applicant are wholly inadequate to enable the Council to properly evaluate the application. They also, we understand, fail to follow the most recent guidance on photography intended to replicate what is visible to the naked eye. The applicant's assessments are clearly inadequate. Para 6.76 of the applicant's Environment Statement appears to acknowledge the potential impact of the development on the AONB's setting and that the issue has not been given due consideration: the "*potential impact on its setting in these areas should be explored further*".
- 6.13 The Council is reminded of the provision quoted above from Core Policy 51 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 natural beauty, must also demonstrate that it would not adversely affect its setting*". This condition has quite clearly not been met.
- 6.14 Irrespective of any other considerations, we consider that the application should be rejected given its proximity to the AONB and the impact it will have on its setting. Even if the Council is minded to approve the application, we do not see how it can do so without very much more extensive investigations being undertaken.

7 Impact on Site of Special Scientific Interest

- 7.1 Coombe Bissett Down, just to the south of Coombe Bissett village, is a designated SSSI managed by the Wiltshire Wildlife Trust.
- 7.2 The National Planning Policy Framework states that: "*proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site*

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of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted" (para 118).

- 7.3 The Wiltshire Wildlife Trust's headline on its website description of Coombe Bissett Down is: "A downland walk with sweeping views". Those sweeping views would now be blighted by the solar park.
- 7.4 We do not know whether the SSSI's scientific characteristics would be adversely affected by the development, but the SSSI is a valued community amenity. It is a popular and beautiful local walk that would be materially diminished by the proposed development, if approved.

8 Views of Salisbury Cathedral

- 8.1 The applicant acknowledges that the spire is visible in views across the proposed development site (para 6.102 and 6.217 of the Environmental Statement). A number of additional policy considerations are therefore engaged.
- 8.2 The Planning Practice Guidance for Renewable and Low Carbon Energy states that: "*great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical appearance but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset"* (para 27)
- 8.3 Strategic objective 5 of the South Wiltshire Core Strategy includes the statement that "*the Salisbury's historic roofscape and spire views will have been maintained"*. It also says: "*Additional challenges are the lack of protection for archaeological sites and historically important unlisted buildings, whether additional measures are needed to recognise the pre-eminent status of Salisbury Cathedral and Close, and the need to review the policy protection afforded to the historic roofscape and cathedral views in Salisbury"* (para 3.9).
- 8.4 The applicant's photomontages and descriptions of the views towards the Cathedral spire are wholly inadequate. We drive to Coombe Bissett north on the A354 several times a week, and the proposed site will appear as far more than the "sliver" suggested. The photomontages are also presented in a way that does not show the Cathedral spire. We do not know the technical reasons why this may have happened, but we would urge all decision makers from the Council to visit the various vantage points and assess the impact with the naked eye. We can assure you that the impact will be far greater than is intimated by the applicant.
- 8.5 The sight of Salisbury Cathedral spire from areas approaching the City is one of the most exciting visual spectacles of the area. It is specifically referenced in a number of the objections to the proposed development that have already been published. The beauty of these views would be significantly undermined by the insertion of an overbearing and out of character industrial development in the heart of the landscape this would have to be a very serious consideration for the Council.
- ## **9 Health and safety**
- 9.1 Coombe Bissett is regularly overflown by civilian aircraft flying to and from Old Sarum airfield, military aircraft and, we understand, helicopters flying to and from Odstock hospital and the Salisbury racecourse.

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- 9.2 The Planning Practice Guidance for Renewable and Low Carbon Energy state that: *"Particular factors a local planning authority will need to consider include . . . the effect on landscape of glint and glare . . . and on neighbouring uses and aircraft safety"*.
- 9.3 The National Solar Centre's guidance states that: *"the sensitivities associated with glint and glare, and the landscape/ visual impact and the potential impact on aircraft safety, should be a consideration. In some instances it may be necessary to seek a glint and glare assessment as part of a planning application"*.
- 9.4 The applicant's Environmental Statement largely dismisses glare as an issue (contrary to the risks identified by the National Solar Centre (a respected industry body)) and gives the briefest consideration to glint.
- 9.5 In a letter to Andrew Bidwell concerning this application, Wiltshire Council's Senior Environmental Health Officer, Peter McMillan, states that he was not consulted about this proposal at the pre-application stage (which we find very surprising) and that *"little information has been provided regarding the potential for the impact of glare from the solar panels at dwellings and private land which will have views of the solar panels themselves. We require more information regarding the degree of reflection/glare from the panels proposed..."*.
- 9.6 We do not have the expertise to critique the relatively brief glint and glare assessment in the Environmental Statement. Given the potential risk to aircraft, and the impact of glint and glare on local amenity, we very much hope that the Council will undertake its own detailed review of these issues.

10 Local residential amenity: Noise and disturbance

- 10.1 The latest version of the Environmental Statement includes a highly technical analysis of the impact of noise emitted by the inverter stations by Soundguard Acoustics. This report is very difficult to understand and fails to address certain obvious queries: for example, each inverter station has 2 fans, each of which have reported sound levels of 60dBA at 3m, but will the sound level when both fans are running on sunny days therefore be 120 dBA? However, what is clear is that there will be some noise impact on neighbouring properties; this is directly contradictory to the applicant's original statement that the solar farm would be *"inaudible at distances of more than 40-50 metres from the [inverter] building[s]"* (see Savill's letter of 18 September 2013), and this is what we feared.
- 10.2 It is commonly known that electrical installations can emit low frequency noise often characterised by a hum or rumble. Low frequency noise can travel a long way and impact sleep patterns, quality of life and health generally (we would refer you to publications of the Department of Environment, Food and Rural Affairs and the World Health Organization on the subject).
- 10.3 The National Planning Policy Framework states:
- "Planning policies and decisions should aim to:*
- *avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;*
 - *mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions"*
(para 123)

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10.4 Core Policy 51 states that:

"In particular, proposals will need to demonstrate that the following aspects of landscape character have been considered:

* * *

(vii) *tranquillity and the need to protect against intrusion from light pollution, noise, and motion"*

- 10.5 There do seem to be some serious weaknesses to the noise assessment. British Solar Renewables made no request to assess noise at our property, despite our objection to the original application on this specific point, and it was excluded from the closest properties in the report, despite our property being the same distance/closer to the southern corner of the site than the Manor Farm residential property.
- 10.6 The report authors admit that their noise assessment is only an estimate as "universally agreed prediction models do not exist" and that "environmental noise is affected by numerous variables which will affect the day to day noise predicted or measured". Given the potential variation of background noise, the accuracy of the BS4142 used in the report to measure the 'likelihood of complaint' must be highly questionable. The authors also assume as a basis for the report that the information, plans and statements provided by the client are correct, but make a fundamental error in paragraph 1 in stating that the site would be a 16.07 MW PV solar park (it would in fact be 14.3 MW). We also dispute the report's conclusion that "complaints are proven as unlikely": the report contents are stated to be an estimate, not proof.
- 10.7 To a layman, the technical report gives no real indication of what impact the noise from the solar farm would have. Noise was assessed at Manor Farm and the report says the power station will create noise of 11dB(A). It states that the background noise when they carried out the assessment was 32dB(A). However, this background noise was assessed on a single day, and at only two times. The background noise at our property varies enormously depending on the season, weather, wind direction and time of day/traffic levels. At times, there is no audible background noise.
- 10.8 We have noted ourselves that traffic noise is at its lowest in summer, the very season during which solar farm noise will be greatest, and also the season when we are most likely to want to enjoy the amenity of time in our garden.
- 10.9 Would the 11dB(A) noise from the inverters be audible when there is no other background noise, and therefore in excess of the 10dB(A) indicating that complaints are likely? The report does not answer that question.
- 10.10 Although we feel strongly about the policy and other issues addressed in this letter, from a personal perspective the potential noise impact is one of two issues which gives us most concern (the other being the loss of visual amenity from key vantage points in the local area).
- 10.11 The report expressly states that there will be an impact on background noise for nearby residents, but no mitigation is proposed to address it.
- 10.12 The application fails to address whether (or assess to what extent) the operation of the solar park will create any vibration or other disturbance for local residents relating to electricity generation.

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10.13 In addition, the construction phase will cause noise disturbance. Giles Frampton stated at the public meeting called by the Coombe Bissett and Homington Parish Council on 16 December 2013 that construction would be 12 hours per day and until midday on Saturdays. There is no further comment on this point in the current revised application, which states only that work will be limited to specific hours with limited working at weekends: the hours are not specified (3.24). Local residents closer to the solar park site, like us, could potentially be subjected to construction noise for most waking hours for an even longer construction phase than in the original application. It appears there will be noise from heavy machinery such as pile drivers and excavators.

10.14 It is not evident from the application to what extent local residents will be impacted by the noise, but Environmental Protection Officer, Peter McMillan, was obviously concerned about the very noisy nature of piling work. In his letter to Andrew Bidwell relating to the original application, Mr McMillan highlights the noise from piling works and the need for restrictions "to manage environmental impact" and "taking into account the difficult character of the noise from piling". Again, the current revised application fails to measure or manage this issue despite the claim by British Solar Renewables in its brochure entitled 'Solar Farm proposal explained' (received by us in the post) that it will do "everything possible to minimise disruption or nuisance to the local community".

11 Local residential amenity: Highway traffic

11.1 The construction phase will evidently result in greater traffic on the A354. Para 3.35 of the applicant's Environmental Statement refers to 278 HGVs (an estimate only) being used and on average 4 deliveries a day. However, it is not clear even in the current revised application how many HGVs will be making deliveries, or when, each day; has the Council assessed the impact (for example) of several HGVs making deliveries during peak commuting or school run hours?

11.2 Wiltshire Council's Development Control Engineer for Highways & Transport, John Harding, in relation to the original application appeared only to have assessed highway safety in his letter to Andrew Bidwell on the subject of highway impact ("*It is considered that the development proposed will not have any significant impact on highway safety and I therefore recommend that no highway objection be raised to it*"). However, neither the applicant nor the Council appear to have given consideration to the how the solar park could affect the flow of local traffic, despite the fact the current revised application says users of the A354 and properties on the eastern site boundary may be affected locally during weekly working hours (6.166).

11.3 The longer term impact of the solar park on A354 traffic has also not been made clear by the applicant or assessed by the Council. Para 3.36 of the applicant's Environmental Statement states that "*it is not considered that the proposed solar park will generate a significant number of trips over its 25 year operation*" but this statement is not supported with any concrete information for the Council or regular local users of the A354. It also seems inherently unlikely that a major industrial installation such as this could largely be left alone for 25 years.

12 Local residential amenity: security/crime and anti-social behaviour

12.1 The solar park site will be surrounded by security fencing and security cameras, highlighting the perceived need to protect expensive equipment and its components from potential criminals.

12.2 The National Solar Centre reports and warns that: "*Policing experience indicates that placing large quantities of expensive photovoltaic panels in isolated locations without adequate protection will attract criminals and the photovoltaic panels and associated infrastructure will*

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be stolen. The main risk will come from organised gangs who will use heavy duty tools and vehicles to remove large quantities of the panels. Stolen panels are likely to be moved from the crime scene before re-emerging for sale." (page 12)

- 12.3 The applicant's proposals for security fencing and security cameras are therefore not surprising, though they do sound inadequate, particularly given that there is already a certain amount of criminal/anti-social behaviour in the area. Drove Lane, which abuts the development site, is a quiet no through road and we have seen regular fly-tipping at the junction between Drove Lane and Old Shaftesbury Drove, and along the Drove itself. We have also been aware of anti-social behaviour in the nature of regular off-road motorcycling at high speed in the woods along Old Shaftesbury Drove.
- 12.4 The development site is both isolated and very close to Salisbury. A solar park in the area may well become a magnet for further criminal and anti-social behaviour, affecting local residents still further. This issue does not seem to have been considered by the applicant or assessed by the Council. British Solar Renewables' own brochure "Solar Farm proposal explained" (received in the post by us) states only that "if sensors are set off an alert is sent to a remote monitoring company that will review the CCTV", but it does not explain:
- (a) whether the unnamed remote monitoring company will take any action in response to an alert;
 - (b) what that action will be or whether it will involve local police; or
 - (c) what the expected response time will be.
- 12.5 The application contains no assurances of how the closest residents to the site will be protected from likely greater criminal and anti-social behaviour in areas surrounding the proposed site, an issue the Council should take seriously.
- 12.6 Further, the additional security that is likely to be required will result in a greater visual impact and loss of amenity.

13 Flood

- 13.1 The flood assessment submitted by the applicant should be reconsidered in light of the devastating floods experienced in Coombe Bissett during December 2013 and January 2014.
- 13.2 The South Wiltshire Core Strategy reminds us that: "*South Wiltshire is characterised by its rivers and this brings the potential both now and increasingly in the future, to cause flooding. A key challenge is therefore to ensure new development is planned to avoid flooding and also, where reasonable, can be used to help implement strategic flood prevention measures*" (para 3.8(c)).
- 13.3 It seems possible that the industrialisation of a 40 hectare sight so close to the village (and on a slope leading down to the village) could exacerbate any future flooding issues. At the very least, this should be the subject of careful investigation.

14 Ecological impact

- 14.1 The applicant's ecological impact report (chapter 7), for example, appears to have been produced after a single day's visit on 18 September 2013. No attempt appears to have been made to study seasonal variations (for example over wintering birds such as starlings), and so far as we are aware there was no night time study.

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- 14.2 When read in detail, the ecological assessment does not make great claims to its own thoroughness. Despite there being a section headed "**Fauna Survey**", the report acknowledges that "*no specific faunal surveys were undertaken*" (para 7.26). Also, "*formal consultation with the LPA with respect to biodiversity was not considered necessary*" (para 7.27). The species data collated during a desk study was "*mainly derived from records submitted by members of the public and ad hoc surveys undertaken by volunteers*" (par 7.28). This is not even claiming to be a comprehensive report, despite the number of pages of the Environmental Statement that it manages to fill.
- 14.3 The Environmental Statement acknowledges that "*it is likely that bats use the hedgerows within the site and adjacent woodland*" para 7.49, but no bat survey was undertaken. The impact of solar parks on bats is little understood. Natural England has said the following:
- "There are some indications that very large, unbroken expanses of uniform solar panels may mimic water surfaces on which insects may attempt to settle and breed . . . Very little research has been conducted to date but one laboratory study . . . showed that bats attempt to drink from panels and occasionally collided with them . . . Juvenile bats are expected to be more prone to this behaviour. Some birds and invertebrates are also likely to be effected."* (Natural England Technical Information Note 101)
- 14.4 The Environmental Statement does not refer to this study. It simply says that "*the effects of solar panels on bats has not been studied in this country, but they are not thought to be a barrier to commuting or foraging bats and may indeed provide a feature for bats to utilise for navigation around the site*" (para 7.82). It is surprising that the Natural England TIN 101 is not referred to.
- 14.5 The impact of the development on breeding birds, including the skylark and chaffinch is considered, but the conclusion is that "*it is not possible to mitigate for the loss of large open areas of habitat for ground nesting birds within the development area*" (7.112). This is clearly a negative effect of the development.
- 14.6 If the Council is minded to approve the proposed development, it seems clear that a far more in depth ecological study will be required.

15 Conclusion

- 15.1 Amongst the reasons given by the application for the site selection are that the land:
- (a) does not lie within national landscape designations;
 - (b) does not lie within, nor is it in close proximity to, an ecological designation;
 - (c) distances from the nearest residential properties are such that potential noise and substantial residential amenity impacts can be avoided;
 - (d) site has lower (grade 3) agricultural land classification; and
 - (e) existing boundary hedgerows provide a good degree of existing visual screening.
- 15.2 These reasons all appear to be incorrect or inadequate:
- (a) the land lies within a Special Landscape Area and abuts an Area of Outstanding Natural Beauty;

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- (b) the land is close to, and visible from, a Site of Special Scientific Interest;
 - (c) insufficient analysis and explanation is given for the noise levels likely to be produced by the solar farm;
 - (d) the site may be Grade 3(a) agricultural land, i.e. amongst our "best and most versatile" agricultural land and afforded special consideration by government policy; and
 - (e) the existing screening does not hide the site, and barely mitigates its visual impact. Because of the positioning and size of the site, any attempt to mitigate its visual impact can have only marginal success.
- 15.3 Greg Barker, the Minister of State for Energy and Climate Change has said: "*I am very aware of concerns raised by the public about the potential growth of large-scale solar farms, particularly where approval does not appear to take full account of the latest planning guidance. Such inappropriately sited solar PV is something that I take extremely seriously and am determined to crack down on*".
- 15.4 The proposed development is clearly inconsistent with current planning policy.
- 15.5 The development site appears to be amongst our "best and most versatile" agricultural land, currently used for food production. The land is in a Special Landscape Area and is directly adjacent to an Area of Outstanding Natural Beauty. It is clearly visible from a Site of Special Scientific Interest, and from numerous residences, community buildings and vantage points over a wide area. The proposed development would be overbearing and would have a materially detrimental effect on the local landscape character and the visual amenity of the area.
- 15.6 Inadequate consideration has been given to health and safety, crime and security, flooding, noise and general disturbance and ecological issues. Given the scale of the development, all of these should be considered in depth before any approval could be contemplated.
- 15.7 We would be grateful to the Council for giving these matters the most serious consideration. In our view, the proposed development is directly contrary to government policy and no credible reasons are given for ignoring that policy. We strongly urge the Council to reject the application.
- 15.8 If the Council is minded to approve the application, we imagine it would only do so with very extensive further investigations. If the Council is so minded (and we would very much hope it is not) we would also ask that we be given a further opportunity to provide comments as to what additional mitigation measures might be appropriate.

16 Application process

Given the implications of this proposal, we consider that it should be decided at a meeting of the Council. If it is, please take this as notice that we would each like to speak at the meeting of the committee at which this application is expected to be decided. Please let us know as soon as possible the date of the meeting.

We very much hope that our comments are of assistance to the Council and if we can help clarify any of the points set out above, do please let us know.

Yours faithfully,

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Jennifer Epworth and Aster Crawshaw

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ADDITIONAL CORRESPONDENCE
SOUTHERN AREA PLANNING COMMITTEE 16th October 2014

Drove House,
Drove Lane,
Coombe Bissett
16 October 2014

Members of the Committee,

I live on Drove Lane in Coombe Bissett. My house is referred to on page 1 of the Planning Officer's report as the residential dwelling to the south-west of the site boundary, only some 100s metres away. My husband and I strongly object to the application, and to the report of Planning Officer, Andrew Bidwell, for reasons I would like to outline below.

1. Government policy generally

I support renewable energy and solar installations in principle, but this development is inconsistent with government policy.

Mr Bidwell refers to the need for communities to contribute to renewable energy generation and councils to have a positive strategy for this, but his report is silent as to very important balancing policy requirements (e.g. in National Planning Policy Framework and Planning Practice Guidance for Renewable and Low Carbon Energy) to ensure that:

- adverse impacts of renewable energy projects are addressed satisfactorily, including cumulative landscape and visual impacts;
- councils only approve the application if those impacts are acceptable;
- where development of agricultural land is demonstrated to be necessary, poorer quality land (such as previously developed land) is preferred to high quality best and most versatile land; and
- great weight should be given to conserving landscape and scenic beauty in ... Areas of Outstanding Natural Beauty (AONB), which have the highest status of protection in relation to landscape and scenic beauty.

While the relevant policy says communities have a responsibility to help increase the supply of green energy, it says this does not mean that the need for renewable energy overrides environmental protections and the planning concerns of the local communities. It is important that the planning concerns of local communities are properly heard in matters that directly affect them. Mr Bidwell in his report is dismissive of the local community's objections on a number of points that I would like to highlight below.

2. Impact on Cranborne Chase and West Wiltshire Downs AONB

- Local objectors refer to the fact that the solar farm would intrude on the AONB. Mr Bidwell rejects this because the site is outside the AONB, and the applicant's Environmental Statement (ES) claims the area can accommodate the solar farm without significant harm.
- Mr Bidwell does not refer in his report to the Wiltshire Core Strategy requirement 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 natural beauty, must also demonstrate that it would not adversely affect its setting - so the fact that the site is a number of metres beyond the AONB is irrelevant.
- Richard Burden of AONB makes clear that the site is a continuation eastwards of AONB, with no critical factors to indicate the landscape has changed. Wiltshire Core Strategy also requires applicants to take into account the AONB Management Plan, but there is no reference to the Council having done this - a major flaw.
- As well as failing to consider the AONB Management Plan, the AONB viewpoints provided by the applicant are not adequate to enable the Council to properly evaluate the application. The ES itself acknowledges the potential impact on the AONB and that the issue has not been given due consideration: the "potential impact on its setting in these areas should be explored further" (para 6.76).

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- The subjective conclusion in the ES as to exactly what degree of harm this causes does not affect the clear conclusion – even by the applicant – that there will be an adverse impact on the adjacent AONB. Government policy is that this must be balanced against any potential benefit of this scheme to a much greater degree than Mr Bidwell has done in his report.

3. Use of poorer quality, previously developed land, or alternative sites

- The site covers 99 acres of what appears to be amongst our "best and most versatile" agricultural land, classified as Grades 1, 2 and 3a – a very large increase in area from the first application. The applicant states only vaguely that the land is Grade 3, and even in the current application, has surprisingly not been required by the Council to specify the grade of this land.
- Government policy is clear that poorer quality land should be preferred unless there is no alternative.
- In dismissing this point in his report, Mr Bidwell refers only to the ES, which deals with this vital issue in one sentence: "The applicant has reviewed a large multiple of sites across Wiltshire and southern England, with many failing the initial site selection process identified above" (para 3.46). What sites? What grade was the land? Were the alternative sites only a number of metres from an AONB, and directly sandwiched between heritage assets like the AONB and Salisbury and a large village with direct vantage points on to the sites? The applicant does not demonstrate that use of this land is necessary, or that alternative sites were properly considered.

4. Solar farm harming residential amenity, including crime

- National Solar Centre's 2013 guidance to planners states that policing experience indicates that placing large quantities of expensive solar panels in isolated locations will attract crime, mainly by organised gangs who will use heavy duty tools and vehicles to remove and steal large quantities of the panels.
- The site is both isolated and very close to Salisbury. There is already criminal/anti-social behaviour in the area: we have seen regular fly-tipping at the junction between Drove Lane and Old Shaftesbury Drove, and along the Drove itself (see accompanying photos of fly-tipping at western edge of solar farm site on Old Shaftesbury Drove, taken 15 October 2014), and very frequent off-road motorcycling at high speed along Drove Lane and along Old Shaftesbury Drove.
- Mr Bidwell dismissed this important impact on residential amenity by saying only that security measures are part of the proposals: he is presumably referring to high fencing and security cameras. We are told in an applicant brochure that "if sensors are set off an alert is sent to a remote monitoring company that will review the CCTV". Will the unnamed remote monitoring company will take any action in response to an alert? What that action will be or whether it will involve local police? Will the applicant contribute to the additional public expense of any such action? What will the expected response time will be? How can the applicant or Council ensure that the same criminals will not target my home or my young family nearby? Criminals will, no doubt, access the site from quiet Drove Lane, in preference to the main access road to the site.

5. Effect on landscape and visual impact

The Landscape and Visual Impact Assessment (LVIA) appears to significantly underestimate the extent to which this development would intrude on the surrounding landscape, but even the Assessor instructed by the applicant acknowledges that:

- there will be significant visual impact to significant public areas to the south and east of the site (Appendix 6.1, Figure 6.3)
- of the local viewpoints in the ES, 68% are High visual receptor sensitivity and 26% Medium visual receptor sensitivity, as the site is gently sloping and overlooked by sensitive locations (Table 6.1; 6.152)

- the proposed development will cause an "adverse effect of major significance" to the landscape character of the site, changing from agricultural land to large electrical infrastructure (6.173)
- the development will "affect the landscape character beyond the site" (6.174)
- the site will cause "direct character changes" to the LCA B2 - Ebbles Broad Chalk Valley Slopes Area (6.175) and "alteration of perception and reduction of tranquillity" to the LCA D7 – Cranborne Chase Chalk Downlands Area (6.178)
- users of the popular Old Blandford Road track will face Moderate visual impact (6.218)
- users of the nearby AONB and Special Landscape Area will experience an adverse effect (6.224)
- users of Harnham Hill public right of way (walkers and residential properties) will be confronted with Moderate visual impact (6.216); and
- users of very popular community resources, Coombe Bissett Village Hall and Nature Reserve, will suffer Major/Moderate adverse visual impact for at least 10 years (6.204, 6.207)

It is clear from the LVIA that the applicant's attempts at masking the site with hedges and planting will not material improve any of the impacts above. Environmental and climate variables mean the mitigation cannot be guaranteed, and planting will not mature for up to 15 years anyway, a considerable chunk of the site's 25-year lifespan.

6. Misleading Council approach to objections

Mr Bidwell's report is misleading as to local support for and opposition to this application:

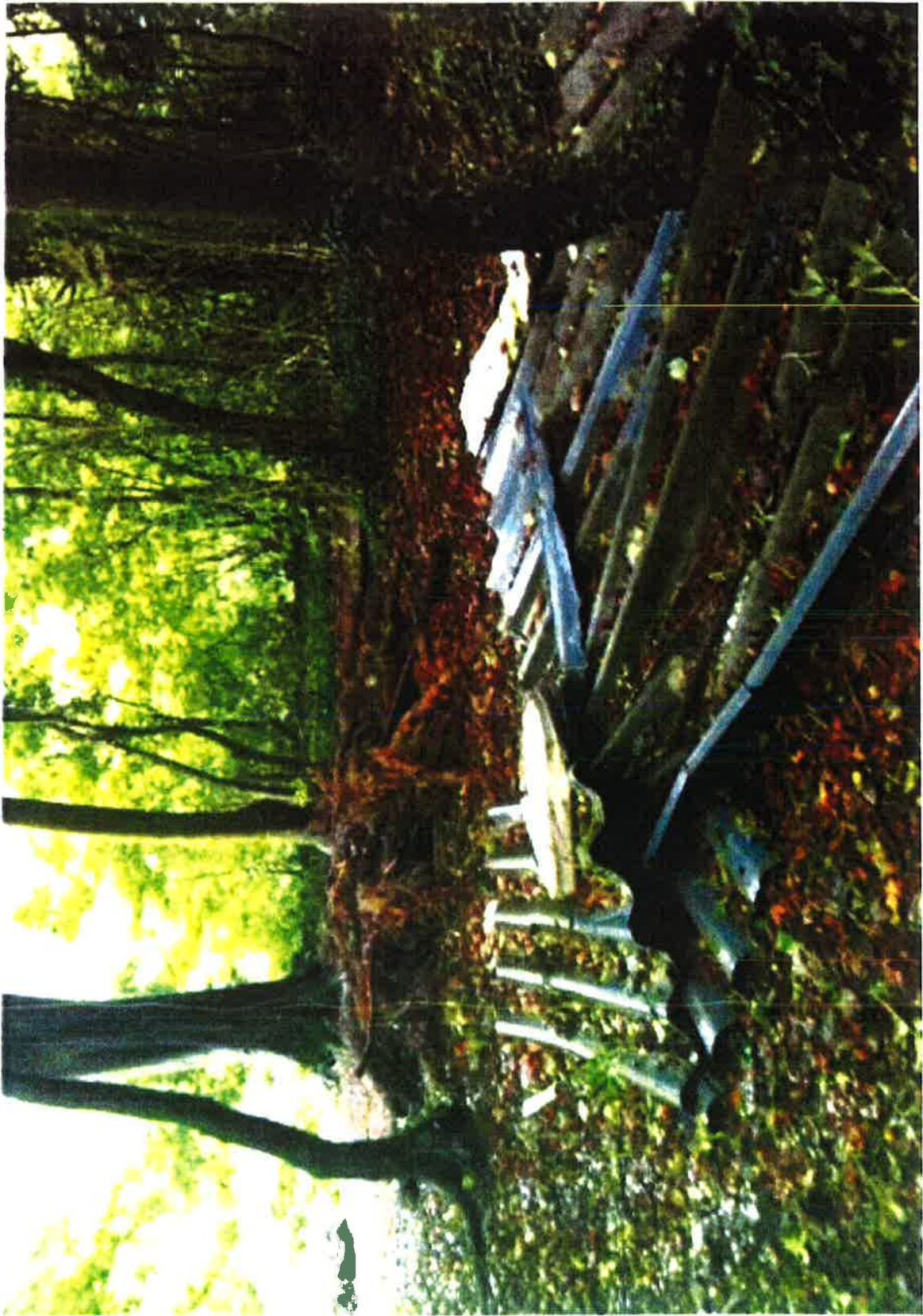
- We are close neighbours, but Mr Bidwell has ignored our objection without explanation, even though it was submitted on time.
- His report states that 16 letters have been received with 7 in support and 9 objecting; in fact, 21 have been received with 5 in support and 16 objecting.
- Mr Bidwell fails to mention that 4 letters in support have been received from Bake Farm operators with a direct interest in approval of the scheme - and unlike the objectors, Mr Bidwell does not challenge or dismiss any of the claims in support.
- Many more objections made to the first application, but these have not been considered unless re-submitted, and yet the (despite close similarities between first and current applications), the Council appears not to have contacted first application objectors or taken their objections into account.
- The applicant and Mr Bidwell refers to extensive consultation of interested parties, but the applicant held no public meeting or exhibition for the current applicant, and at no point have we been contacted by the applicant to discuss this application.

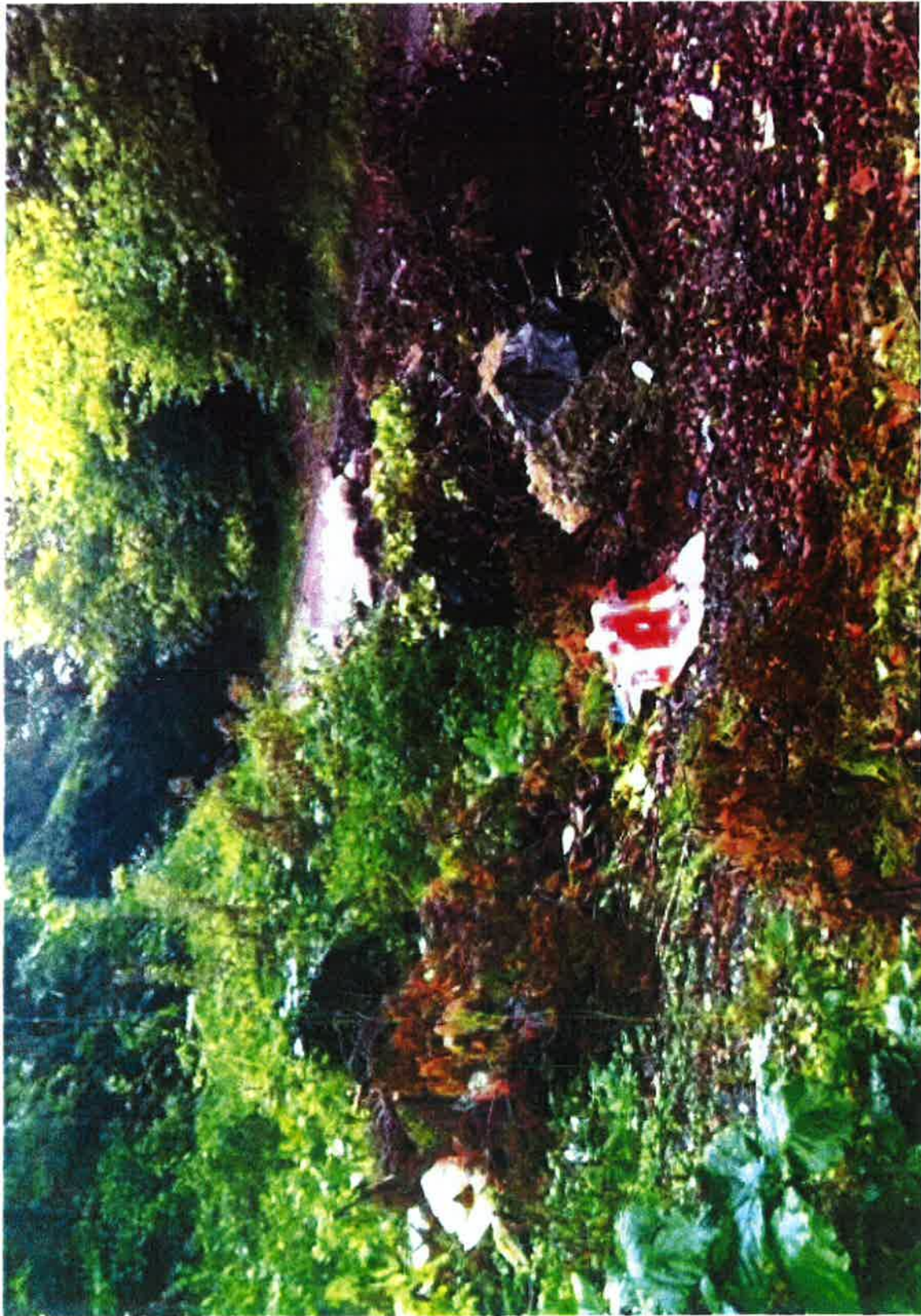
Conclusion

Despite the attempts of the applicant and Mr Bidwell to address them, the impact of this application on the local community and its valuable landscape are too significant for the Council to approve - even when balanced against the undisputed need for green energy.

The local community has objected that this plan replaces valuable agricultural land with an industrial power station. This is dismissed by Mr Bidwell, who says the loss is temporary. However this completely misses the point that in the intervening 25 years, it is the local community that has to bear the loss of food-producing agricultural land, valuable landscapes and residential amenity. I urge you to reject this application.

Yours faithfully
Jennifer Epworth







Chairman and Committee Members
Southern Area Planning Committee
Development Services South
Bourne Hill
Salisbury
SPI 3UZ

2 Shergold Cottages
Homington Road
Coombe Bissett
Salisbury
SP5 4LT

12TH October 2014

Planning Application No: 14/06864/FUL

The erection of solar photovoltaic panels and associated works and infrastructure on land to the west of Bake Farm Buildings, Salisbury Road, Coombe Bissett, Salisbury, SP5 4JT.

This represents 40.2 hectares, or 99.36 acres of scenic, agricultural land, bordering the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty, producing up to 14.3 megawatts of solar electricity. The site is surrounded by arable fields.

Dear Committee Member,

Prior to the Southern Area Planning Committee public meeting on 16th October 2014, we wish to make the following comments with reference to the above planning application:

There is not a proven need for this power station site and this appears to be in line with the Department of Energy and Climate Change assessment, Greg Barker's planning directives to local planning departments this summer, and the views of the Department of Communities and Local Government.

The residents of Coombe Bissett believe passionately that this out-of-scale, industrial proposal will have a detrimental effect on: their strong sense of local community values; the village settlement as it is currently perceived - as an asset to Salisbury; and sadly it will defile surrounding, breathtakingly beautiful landscape, affecting an AONB adversely with its industrial impact.

It is a crude planning device to achieve megawatts that should be sourced using more appropriate sites and technology, and local community driven ESCOs. Current government thinking supports this.

It represents poor return on generous tax-payer subsidies, at a time when our local public services are being cut to the bone. We would expect Wiltshire Planning to be determinedly pursuing more significant returns to the local community and lead the way for community stake holders, in any large scale energy plant that has their backing.

There is not the proven need that dictates approximately one hundred acres of scenically beautiful agricultural land, viewed from AONB, should be taken out of food production to provide megawatts that are achievable by other, more useful schemes. We need to protect food production resources.

It does not provide employment or housing opportunities.

This power station rewards the developer and land owner.

It is visually, entirely against the context of location, a highly controversial presence bordering AONB. It will spoil many cherished viewpoints from much used amenities around the village of Coombe Bissett.

It will set a 'Test Target' case and a green light for a concentration of more of the same in this area. This is the reality of what is happening in other parts of the county. The DECC is against these large scale developments and has issued planning directives accordingly. Why is the planning department backing it against ministerial directives?

With respect, it is hoped that the committee members have been afforded the opportunity to visit Bake Farm, and Coombe Bissett's amenities, to personally discern the profound repercussions this

proposal will have, not only for Coombe Bissett, but for the AONB and environs of Salisbury. It is hoped that committee members have also experienced the reality of a comparable solar farm/park installation, and crucially that all the letters of objection will be read in full, before any decision is made. The issues are complex and far reaching, far wider and deeper than this particular scramble for generous megawatt subsidies indicates in planning formula. The residents of Coombe Bissett have worked long and hard to be heard in this matter. The potential repercussions - profound!

This is More Madness than Megawatts

The developer, British Solar Renewables Ltd., reason for this Solar Park development is to contribute megawatts to Wiltshire County Council's renewable energy targets, as part of national 2020 targets. We support the principle of renewable energy projects and find the CAMCO Report 2011, commissioned by Wiltshire Council (a key Sustainable Energy study to help inform policy development for the area's emerging development strategy and subsequent Local Development Framework documents), with its mix of achievable targets for Salisbury, particularly reassuring:-

'The total practical potential for renewable energy (electricity and thermal energy) within Wiltshire is estimated to be around 2,000,000 Megawatt hours by 2025. This includes microgeneration technologies from existing and new buildings, as well as decentralised energy sources such as biomass, wind and hydro.

This report provides a very achievable base case of renewable energy generation which is close to the minimum of what the Council should be doing to play its part towards meeting the national target of 30% electricity generation from renewable by 2020'

It identifies a layered mix of potential energy generating projects, which could be employed to achieve national targets. However, large scale solar parks are not seriously analysed in this key report. They are not an important feature in the mix for Salisbury. The report does not promote the removal of food production land in preference to solar park/farm development.

Nevertheless, it does determinedly promote various other, more visually discreet and community friendly ways in which the farming sector can contribute megawatts. The Bake Farm Solar park developer, tapping into subsidy culture at all levels is particularly eager to lock-in the generous taxpayer income stream at this precarious point in time, now there is an evidential change in directives from central government. Taxpayers and MPs (three in Wiltshire) are critical of these schemes. They are demanding more sensible solutions and a more considered and direct 'return' for local economies, in the form of local community stake-holder schemes, and increased employment opportunities that should be achieved as a result of driving down operating costs.

Large solar parks/farms in rural areas are now being discouraged, determinedly. They are recognised as crudely inappropriate responses, and counter-productive to the economy and sustainability of rural communities and landscapes. However, clear fields beckon bigger profit margins and small villages can only generate ineffective and naive objections against well practised professionals. The pressures on small communities are immense when it comes to resisting these developers.

Many more large scale installations are going through the planning process, including a vast 40MW installation; 'High Penn Farm Solar Park' at Wroughton Airfield, south of Swindon – a controversial collaboration between Swindon council and The Science Museum. This will supersede the current largest solar park in the UK: Lark Energy's 32 MW development at Wymerwold Airfield, Leicestershire.

There is another council-owned site proposed at Chapel Farm, Blunsdon; and additional work being done on solar panels along the A419 and M4.

Wiltshire Council is working on a Low Carbon Development Order, making it easier to build renewable energy projects in Swindon.

A 12MW Solar Farm is proposed for land adjacent to Boscombe Airfield.

Fifteen solar sites are approved or proposed within 10 km of Melksham – totalling 1,000 acres!

Do we want to roll this out around Salisbury? Don't we need to take a pause before unleashing this here?

The overwhelming glut of large scale, solar park planning applications has necessitated the contrived removal of large areas of food production land. This has been approved in preference to brownfield and redevelopment sites. Is this a sensible and sustainable way forward?

Where is the material evidence that brownfield/redevelopment sites have been objectively evaluated for solar PV energy in the areas around Salisbury, as alternative providers, and rejected in preference to the agricultural site at Coombe Bissett? For example, the aptly named Solstice Park – how many solar PV roofs, specifically, are being strictly enforced through planning directives, across the 160 acre site?

Driving around it, there is an astonishing absence of photo voltaic roof panels across the whole of this ongoing area of development, industrial and residential. Why?

The Solar park/farm situated at the junction of A303 and A338, just inside the Hampshire county boundary, confirms that the reality would 'visually scream,' in a Greenfield location.

What is the solar panel potential of the Central Car Park retail, leisure and dwellings development, and of the Churchfields and Engine Sheds employment and dwellings site, or MoD redevelopment sites? - Tremendous opportunities to deliver discreet solar megawatts, community ESCOs and added value to taxpayers subsidies, channelled back into the local economy?

It is essential that the proliferation of Solar park/farm sites, in the clamour for generous government subsidies, is sensitively policed with full respect for site and local community impact considerations. We need to reflect carefully and check the sums before plastering more vast areas of green fields with incongruous toughened glass, taking large parcels of productive land out of food production.

The south of England is the fastest growing sector for renewables.

Greg Barker, Minister of State for Climate Change, and resolute supporter of renewable energy, recently announced revised planning guidance for renewable, intended to give local communities more power over proposed developments. He stated that " Solar has a bright future in the UK, but not at any price. I want solar targets on industrial roofs, homes and brownfield sites, not on our beautiful countryside."

In April 2014 he followed up this directive to all planning offices making clear the Department of Energy and Climate Change (DECC) had serious concerns regarding solar farms on Greenfield sites, confirming that, "I do not want uncontrolled expansion of solar on the countryside. The main focus for future growth must be onsite generation. That should mean roof top deployment on industrial, commercial and retail rooftops – even car parks and brownfield sites. Putting solar on just 1.6% of all such buildings would deliver the 20,000 MW" The Target for 2020)" Barker also drew attention to the rampant growth in UK Solar Power capacity, from virtually nothing in 2010 to 3,000 MW in 2013.

The DECC specified: 'We want to move the emphasis of growth away from large solar farms'.

'The (above) decision follows an admission by Ministers that far more projects have been built than expected, leading to a rising subsidy bill for consumers and increasing local opposition.' (Emily Gosden: Daily Telegraph, 13th May 2014)

The CAMCO report also demonstrates how a cynical use of desk-top, box-tick formulas can achieve 'feasibility viability,' in consultation with developers. Development areas and individual sites with high potential yields for decentralized energy can be identified and targeted in simplistic interpretations. Therefore, once a target tests positive, a 'green light' allows repeat and repeat – as is happening around Melksham! It's a one dimensional, one size fits all; ignore the human fall-out costs, crude implementation. The cumulative effect will be profoundly damaging, to people in small communities, as well as to the landscape of Wiltshire. The sustainability of small populations will be undermined.

The consultation system is unjust. The planners, developers and large land-owners have all the aces, while the communities that suffer the brutalising effects and devaluation of their homes, are blind-folded and have no understanding of the language or rules of the game! Planning officers are paid to protect the long-term best interests of their local community, through sensitive planning initiatives. Predatory commercial interests that know how to box-tick the convenient combination of: generous taxpayer subsidies, connection to the national grid, main road access, clear fields and wanting farmer, should not be given free reign to serve up a few more megawatts in their hunger for lucrative, long-term income streams. They have no interest in the local community and show contempt for place, before moving on to the next wanting farmer. There is much more to the 'argument of interests'. There must be better use of taxpayer subsidy.

The Bake Farm Solar Park planning proposal could well prove to be the 'Test Target green light' for Salisbury and environs? The A354 is being sized up.

The subsidy culture in farming solar panels has proved an easy source to tap into and has taken off in Wiltshire to such an extent that we are in serious danger of losing the sound qualities so valued in the Wiltshire Core Strategy :

A strategy which will ensure that the most is made of Wiltshire's outstanding environments

'Wiltshire has one of the richest and most varied natural, historic and built environments to be found across the country. The evidence upon which this strategy is based clearly indicates that the quality of the environment is a key competitive advantage for Wiltshire in terms of attracting investment. While other parts of the country may have more readily available developable land, it is the quality of life that is a key strength and attractor to investment in Wiltshire. **Put simply the way that Wiltshire looks, is a key strength and the rich environments and heritage will be managed to act as a catalyst for the realisation of this strategy and not a barrier to it. This means the careful stewardship of our environmental assets so that growth is complimentary and does not erode the very qualities that make Wiltshire so attractive in the first place.** The policies later in this strategy will demonstrate how this will be achieved and that the aims of attracting investment and caring for our environments are mutually compatible and that without carefully managed growth many of the opportunities to safe guard and strengthen our environmental assets will be lost'

Core Policy 1 Settlement Strategy : 'Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.'

Bake Farm Solar Park will not provide any employment opportunity other than the initial setting up (probably by outside contractors transported to the site). It will not meet any housing needs. It will not deliver any services or facilities to the local community. The farmer will not have access to the site during the lease period. The third lay-out reconfiguration of this unwanted development is still too visible from too many viewpoints around the village and from Areas of Outstanding Natural Beauty.

Food production, and how we maintain output, remains a high level concern with climate change and population growth. A Cambridge University report estimates a likely shortage of two million hectares of arable land by 2030. Andrew Montague-Fuller states that there is a danger that the

future farming landscape of Britain might not be compatible with the country's needs." We may well find there's a large amount of land growing biofuels, has solar panels and wind farms on it, when actually we need more land put aside for the food needs of our growing population." (The report has been produced by the Cambridge Institute for Sustainability Leadership in collaboration with the National Farmers' Union, and companies including Asda, Sainsburys' and Nestle.)

A Times article reports: 'A thousand applications for renewable energy projects, including wind and solar farms, may be causing needless anxiety for homeowners because enough have already been granted planning permission to meet Britain's 2020 green targets, a study has found. The projects that are said to be surplus to requirements include about 3,000 onshore wind turbines, 3,000 offshore ones and 100 solar farms of five acres or more. A total of 16 gigawatts of renewable energy capacity has already been built, producing enough electricity to supply 11 million homes. Another 19GW is either under construction or has been granted permission and is waiting construction.' (Ben Webster Environment Editor: The Times, 06/05/14)

The same journalist informs us: 'Britain has more offshore wind turbines than the rest of Europe combined, according to an industry report. More than 200 giant offshore turbines were connected to the grid last year, bringing the total around Britain's coast to 1,082. There are only 998 offshore turbines in the rest of Europe, according to the report by the European Wind Energy Association (EWEA).'

The Bake Farm proposal states that the site is Grade 3 agricultural land and it implies that it is not of good quality. The Gov.UK and Natural England websites show the ALC (Agricultural Land Classification) across the UK.

In the South West, grade 3 farmland makes up the vast majority. In Wiltshire it is almost entirely grade 3; so to suggest this is a lesser quality than other land available, and therefore expendable, is grossly misleading.

This land is the fabric of this area. It is as beautiful as it is productive. In a year of extreme local weather conditions, there is plenty of evidence to show that the crop yields on land surrounding Bake Farm have been, at the very least, good.

James Gray, MP for North Wiltshire stated in the Wiltshire Times: "We are all very sympathetic with the need for renewable energy, but there is a place for everything, and I don't think productive, unspoilt arable land in this area is the right place for an industrial development."

British Solar Renewables Ltd website, on close reading, gives conflicting 'lease time' objectives for the proposed site. There is an explicit intention of 50 years, following a repeat, second planning application. If this misguided proposal is approved there needs to be water-tight closure of the site and unequivocal return to agricultural use after 25 years.

Could there be periods when these panels are shut off? Will the taxpayer have to subsidise any shut-down period?

The CAMCO report states: 'Wiltshire Council has a great opportunity to directly progress renewable energy installations and decentralized energy generation by taking forward projects on its own buildings and land. Wiltshire Council could establish a local energy service company (ESCOs to help implement these low carbon energy projects. There is particular opportunity in terms of using public buildings as an anchor heat load around which CHP and district heating networks can be established. This also applies to NHS and MoD facilities in the county'.

British Solar Renewables Ltd., own website promotes its company by example of industrially located installations, stating the advantage that 'planning permission is not required'.

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British Solar Renewables Ltd., own website promotes its company by example of industrially located installations, stating the advantage that 'planning permission is not required'.

Leonie Green (Solar Trade Association), has stated that large scale roof installations make good economic sense.'

There is growing public debate as awareness catches up with technological advances; and the need to site these installations appropriately and reduce their industrial scale is now all too evident. They have to be designed to work discreetly within context. We must protect scenic quality and landscape character features and respect local community views. These values are crucially important.

The 'well-being power' permitting local authorities to do anything which they reasonably consider will improve the well-being of the area cannot be contorted to justify large solar farms being conveniently sited in small, thriving rural communities.

6.38 Wiltshire Core Strategy

'The development of most standalone renewable energy installations within Wiltshire will require careful consideration due to their potential landscape impacts, especially in designated or sensitive landscapes, including AONBs.' Coombe Bissett is a sensitive area.

British Solar Renewables Ltd website features the advantages of industrial roof arrays: 'Alan Bartlett and Sons, Chatteris in Cambridgeshire' is a good example for comparison. 4,113 solar panels, the largest privately owned roof-mounted system in the UK, generating 25% of the company's total energy consumption. Presumably, as a large food production company, this has real potential to increase employment opportunities, by driving down costs.

According to CAMCO (2011), Wiltshire Council could promote Community ESCos for new developments, giving residents a material stake in the rewards of carbon compliance. Is this happening now and, if so, what is the energy saving trajectory for 2020?

Does the Council have a running database available to the public which is continuously populated with data about new installations and the cumulative megawatts being generated, in order to quantify the target gap?

On the subject of gaps, there is a Greenfield 'Landscape Gap' between Coombe Bissett and Salisbury. This includes a beautiful tree lined stretch either side of the Bake Farm turn-in, which reveals stunning views and play of light through the trees, especially in winter sunshine. It is probably the most attractive approach road into Salisbury (A354 to Blandford). The industrial presence of a Solar park/farm would result in an irresponsible, deliberate violation of a much treasured feature. It is this type of careless decision making that will have a significant, negative impact on the perception of solar per se.

The 'Landscape Gap' scenically separates the individuality and dynamic of each settlement: Salisbury and Coombe Bissett, and complements both. It facilitates the aesthetic quality of 'setting' in the landscape. If this planning proposal is approved, could we see further development within this gap? If this proposal is approved might the 'Test Case' open up a solar park corridor along this road with a surge in applications similar to the Melksham problem? What would prevent it?

The planning implications of Bake Farm Solar Park are overwhelmingly unnecessary and detrimental. Salisbury cannot suffer any more misjudged planning decisions. The city centre is in a very sad condition and it needs all the supporting area pull, to attract more visitors. After all, we had a tough fight to keep the cherished trees that grace the main square! Local people are justified in feeling embittered about nonsensical planning decisions and do feel their carefully evaluated views count for little, as those directly affected.

Coombe Bissett suffered severe flooding earlier this year. The run-off from surrounding fields exacerbated the situation and torrents of water, over many weeks, were funnelled down the A354 toward Coombe Bissett from the higher levels at Bake Farm, adding to the 12+'' depth of water

between the pub and church. There is serious concern that approximately one hundred acres of impermeable glass, on south facing slopes will significantly add to run-off, a real threat to homes in the village, many of them listed properties. Many homes were flooded and families were forced to vacate for weeks. Pumping out took months in several cases. In the opposite direction, the A354, a little towards Salisbury from Bake Farm turn-in, floods regularly and predictably in times of heavy rainfall and represents a treacherous risk to drivers. A reliable source confirms the water table is exceptionally high now, before the onset of winter rain.

The unspoilt landscape impacts directly on the well-being of the village. The residents treasure the connection to landscape. For decades, the community has given time and energy freely to the care and protection of the village and the local environment. We have a Nature Reserve rich in bio-diversity, rare breeds graze, there are valued woodland and river areas, sports fields and public footpaths. Gardens are rich in their range of trees and plants and residents are knowledgeable in their nurture of wildlife.

The somewhat box-tick tokenism to ecology and bio-diversity of this proposal does not appear to facilitate measurable enhancement. In fact, it will necessitate restrictions over 99 acres.

Will British Solar Renewables Ltd., be seeking 'variation' add-ons to the planning proposal? For example, will there be any site changes if they should include photovoltaic-battery storage technology as it is soon to come into production, or might they seek to increase the size of panels – as they have done elsewhere? Who will monitor any changes to the site, is there a spot check inspectorate system?

The residents deal with flood damage and fallen trees; ditches are cleared, pavement railings painted and well-used footpaths maintained. Volunteering for the good of the village is a way of life here. It is a cohesive and vibrant community, intent on enhancing the village and welcoming appropriate employment opportunities, for future generations. A planning application is in process for an appropriately scaled development of affordable homes, endorsed by the village residents. As it currently operates, it is an enviable, well-balanced model of a thriving, village community. It is an asset to Salisbury. We all work at this.

Bake Farm Solar Park will not offer any employment opportunities. It will have a hugely demoralising effect on the residents of Coombe Bissett.

The much used Sports field and Nature Reserve have wonderful views across the village, at high level, also taking in AONB and the Solar Park site at Bake Farm. Factoring in the extra planting detail described in the latest planning proposal, those views will be ruined. (Please refer to letters of objection: AONB and Mr. And Mrs. Crosthwaite)

Small communities have particularly delicate demographics. Once those who care are demoralised and move out, villages can rapidly deteriorate and lose viability. It is counter-productive to override the rational concerns of residents, to dismiss their values and views. This is now recognised in the Wiltshire Core Strategy.

To our limited knowledge, the following (well placed to know) MPs have expressed public concerns about the proliferation of solar park sites in rural areas: **Eric Pickles MP (Secretary of State for Communities and Local Government)**, **Greg Barker (DECC)**, **Michael Fallon MP (Secretary of State for Defence)**, **Sarah Wollaston MP for Totnes**, **Claire Perry MP for Devizes**, **James Gray MP for North Wiltshire**, and **John Glen MP for Salisbury** and **PPS to Eric Pickles**. **Michael Fallon** and **Dr. John Constable (Renewable Energy Foundation)** have both expressed serious criticisms of the procurement process.

Ernst and Young warn of the highly speculative nature of these schemes and warn of, "sinking investor confidence."

We repeat the opinion of our MP, John Glen: ('View from the Commons': Salisbury Journal, 23.01.14)

'Support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity and provide opportunities for local communities to influence decisions that affect them'.

Are green fields and small communities essential to solar energy production?

If not, then planning officers must find an alternative, more appropriate solution.

If Bake Farm is the only way, **then it must be explained by planning officers more effectively than it has been to date.**

Or, will the company that has no interest in this village, other than exploiting it for a generous taxpayer-backed income stream; and has no genuine understanding of the values we place on the natural beauty here; be permitted to make large gains and walk away to leave us with the eyesore?

Angus Crawford Macdonald, director and founder of British Solar Renewables Ltd., runs his business from Higher Hill Farm, Butleigh, Glastonbury BA6 8TW. He is third generation farmer and presumably has the advantage of mutual rapport with farmers. He holds 64 appointments at 64 active companies, has resigned from 8 companies and held 4 appointments at 4 dissolved companies. Most are listed at that address. For a long list of companies and director company timeline: www.companycheck.co.uk/directo/916513031 - Bake Farm appears on page 2.

British Solar Renewables has informed our Parish Council that they "will not go away" – they have no intention of accepting the local community resistance to their relentless reworking and withdrawing of planning applications. The consultation process does not appear to have been inclusive of village residents after the initial presentation for the first application. There is nothing pleasant about this company's pressure.

Who should benefit most, from generous taxpayer incentives for solar energy : elusive developers and subsidy savvy land owners, or families, schools, hospitals, council buildings, community led schemes and places of employment?

Is it progress to remove almost one hundred acres of land from food production to install an industrial scaled power-station on a Greenfield site, which might, given the perfect conditions, generate up to 14.3 megawatts, that should be sourced in ways more appropriate and beneficial to the local economy?

In complex, ground-breaking matters such as these, where the consequences are profound and controversial for the local, and wider community; what objective analysis, and which policies and criteria are available to: the applicants, officers, councillors, and local community residents - to inform and guide their assessment of the cumulative effects of adding to the existing proliferation of Solar parks and farms in Wiltshire? Is there any tabled consultation with local MPs, who might have material advice regarding current government policy implementation? (John Glen our local MP and PPS to Eric Pickles, Secretary of State for Communities and Local Government.)

These large solar park/farm projects demand a dramatic shift in the interpretation and ethos of planning regulations, to contrive the incongruous industrialisation of Greenfield. By any standards, 99 acres of engineered, toughened glass, installed in regimented lines behind security fencing is 'large and industrial' and brutally out of context. The bottom line is the generation of megawatts.

Is there really no other alternative? Common sense screams PLEASE, THINK AGAIN!

Yours sincerely,

Philip and Linda Buckley

Solar Photovoltaic Proposal at Bake Farm, Coombe Bissett Application No. 14/06864/FUL

Dear Mr Bidwell

I fear I may be too late to do so, but having seen a report of this proposal I write to object most strongly to this application.

This 40+ hectare site is bordering the West Wiltshire Downs Area of Outstanding Natural Beauty and Cranborne Chase. It is proposed to build this colossal solar park on a greenfield site agreed to be good arable land. It beggars belief that permission could be granted to destroy this beautiful area by erecting the proposed solar park: it should not be assumed that the erection of green fencing around the site would lessen the impact of the development. I urge the planning committee to take into account the views of the local population and refuse permission.

Eileen Spalding
24 Westbourne Close
Salisbury
Wiltshire
SP1 2RU

Appendix 2

15 October 2014
FINAL-ctte Letter-15.10.14



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Dear Mr Guest,

Planning application reference 14/06864/FUL - Proposed Solar PV farm at Bake Farm, near Coombe Bissett

Further to our current planning application we write in response to the representations you have recently received and which we understand are to be made available to the planning committee meeting on 16th October as 'late items', principally a letter from the resident of Drove House, Ms Epworth dated 22 September 2014.

Policy Context

Some 12 pages of the letter repeat planning policy and other material considerations of variable significance, ranging from the NPPF and NPPG through to ad hoc advice from trade associations. The letter claims that the ES provides only a brief summary of policy. Our response is that in addition to the policy summary provided in the ES the application was supported by a Design, Planning and Access Statement which set out some 12 pages of policy and other material considerations including much of that highlighted in the representation letter from Ms Epworth. We do not believe it is therefore necessary or useful to respond to the representation on a line by line basis, as clearly planning officers will be aware of relevant planning policy, particularly that set out in the development plan. However we do feel it necessary to respond on the following thematic issues.

Issue	Response
Separation distance from Drove House to solar farm boundary is 350 metres	Separation distance from closest solar farm boundary to closest the boundary of Drove House is 620 metres
Lack of consultation	The letter acknowledges receipt of a letter and brochure from the developer dated 1 August 2014 which provided details of the revised application. The same letter invited interested persons to contact the developer. No correspondence was received from Ms Epworth.
Planning documents are extremely long and complicated / concerned scheme was withdrawn rather than amended / Concerned that assessments are not objective	The application is in accordance with the relevant EIA regulations and assessments are undertaken by independent third party expert consultants who are members of appropriate professional or industry groups
Site area has increased from 28.5 hectares in previous application to 40.2 hectares in current application.	Whilst the red line site area has increased as stated this has been in order to accommodate temporary construction laydown and drop-off areas. The actual footprint of solar panels has reduced from 23.4 hectares to 21.68 hectares as also evidenced by the reduction in stated generation capacity from 16MW to 14 MW.

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Agricultural land grade/site selection	See more detailed response below
The site is subject to Policy C6: Special Landscape Area	The supporting text to policy C6 sets out the principles for the interpretation of this policy. Para 7.10 confirms 'Salisbury and Wilton have particularly fine landscape settings, being contained in a bowl shaped formation within the chalk downlands. The high quality of the surrounding landscape is a constraint on the development of any land on the edge of, or close to, the urban areas, especially where it forms the skyline.' The site is over a ridge from the Salisbury/Wilton bowl formation, out of sight from the city and its environs, and is not on the edge or close to the urban area or form a part of the skyline when looking out from the centre of Salisbury. In addition the Special Landscape Area is not referenced as a constraint in the relevant renewable energy policy PS8.
The site is adjacent to the AONB and the case has not been made for the development.	The proximity to the AONB is acknowledged by the applicant and the impact has been assessed and set out in the landscape and visual assessment contained within the Environmental Statement, with the conclusion being that no significant impact will arise. See also applicants additional information response to comments received: AONB which is attached to the officer's report to committee.
LVIA methodology is not accurate, question receptor sensitivity etc	LVIA methodology is in accordance with the Landscape Institute Advice Note 01/11. See also applicants additional information response to comments received: AONB which is attached to the officer's report to committee.
The viewpoints are wholly inadequate	The viewpoints were agreed in writing with the planning officer and consultees through the EIA scoping request of 18 September 2013. Additional viewpoints were added for the revised application in response to representations received.
The site would be visible from a SSSI	Visibility from a SSSI is not a valid consideration, rather the issue would be whether there is an impact on the species present within that habitat. There is no such impact in this case.
There will be an impact on the heritage asset of Salisbury Cathedral	A heritage impact on the cathedral spire cannot occur because the site cannot be seen from Salisbury, particularly the medieval core, which forms the setting to the Cathedral.
Glint and Glare has not been considered	Glint and glare was dealt with at para 6.154-6.163 of the ES and concludes that Glare is unlikely to be an issue as solar panels are designed to maximise absorption of light and have a surface that is anti-reflective and diffusing.
The noise assessment is too technical and difficult to understand and has serious weaknesses.	A 27 page independent noise assessment was provided at appendix 3.2 to the ES based on measurements from an existing operational solar farm and a background noise assessment at the site. The conclusions are clear: 'It has been demonstrated that the predicted specific noise associated with the inverter units will be at least 10 dB or more below the measured background noise level at the identified noise sensitive premises and as a result the noise from the PV solar farm is unlikely to be significant or detectable at nearest noise sensitive properties.' It is clearly based on the submitted plans.
Inadequate consideration has been given to health and safety; crime and security; flooding; noise; general disturbance and ecological issues.	Solar farms are not an unusual development with many operational examples across the UK and Europe. Impacts are known, quantified and measurable from these operational sites and there are no known cases of statutory nuisance claims. None of these issues have been raised as a concern by the relevant statutory bodies. Specifically, Natural England has no objection in respect of ecology; the Environment Agency has no objection in respect of flooding. Any remaining concerns can be dealt with by planning conditions, for example a Construction Management Plan to deal with health and safety and general disturbance, a protocol for dealing with security.

Agricultural Land Grade

Policy context

The National Planning Policy Framework para 93 emphasises the importance of renewable energy stating: 'planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development' (para 93). Para 112 of the NPPF is particularly



relevant to the consideration of commercial scale ground mounted solar farm development and states: "Local planning authorities should take into account the economic and other benefits of the best and most versatile land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality".

The Government's online Planning Practice Guidance advises that local planning authorities should consider two distinct but interrelated elements for solar farms on agricultural land, namely that 'the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays ..' (para 013).

The 2003 Salisbury District Local Plan (SDLP) remains part of the statutory Development Plan by virtue of some policies having been 'saved' by ministerial Direction. Whilst parts of it have since been superseded by the South Wiltshire Core Strategy, the SDLP continues to play a role in determining planning applications, particularly in relation to detailed technical issues. Agriculture is dealt with at paragraphs 7.40-7.43 of the SDLP, and paragraph 7.41 states:

'The best agricultural land, especially where it occurs in large blocks, will therefore be safeguarded and development proposals on land of grades 1,2 and 3a in particular will be resisted where they would result in it being irretrievably lost to agriculture' (our emphasis)'.

The proposed Coombe Bissett Solar Farm is a temporary and fully reversible use of the land. On the cessation of the use, and in strict accordance with a planning condition, the site could be sensitively decommissioned and managed to ensure its return to intensive agricultural production. No agricultural land would be permanently sterilised as a result of the scheme, and there would be no reduction in land quality as a result of the proposals. It therefore complies with the Salisbury District Local Plan and, in addition, Natural England, has confirmed the above in their response to the planning application.

In addition, the physical footprint of the proposed development is significantly smaller than the overall site area of 40.2 ha stated within the planning application, and is limited only to the surface area of the piling used for the framing system and the plinths and bases for the related electrical equipment such as the inverter stations and switchgear. As such, grazing of the land would continue to be possible during the operational life of the solar farm. In addition, the site will also deliver a range of biodiversity enhancement measures for the life of the solar farm, including both new and enhanced landscape planting around the site boundaries.

Land Grade and site selection

Sub-regional scale

On this subject the following is already stated at page 17 of the submitted Planning, Design and Access statement:

'As noted above, the site is Grade 3, however the following factors should be borne in mind:

- the proposed development would enable some grazing to continue;*
- the installed array is temporary and its effects are reversible;*
- the majority of agricultural land in Wiltshire is Grade 3 of the Agricultural Land Classification, meaning that it in local terms it is not of special value;*
- where Grade 4 land exists in Wiltshire it is typically in the base of river valleys. These are not favourable locations for solar energy as they are typically at risk of flooding and of greater ecological value, and rarely offer large expansive areas that are practicable for large solar farms; and,*
- where Grade 5 land exists in Wiltshire it tends to relate to the steep scarp slopes of the county's characteristic downland. These are not favourable locations for solar development because they are*



physically difficult to develop and more visually prominent. Within South Wiltshire the majority of Grade 5 agricultural land is within the Cranborne Chase and West Wiltshire Downs AONB.

The above is also confirmed at the attached figure 1, a sub-regional extract from Natural England's published agricultural land quality maps.

Within 2.5km of the site

When seeking to develop a solar farm the ability to connect to the local electricity distribution network (i.e. grid connection) is an absolute constraint which restricts the location of viable sites. In addition this is a 'moving target' with grid availability and costs directly impacted by other electricity generation projects coming forward (wind, solar and more traditional generation) and taking up grid capacity. In order to control these costs and risks a developer will obtain a formal grid connection agreement with the DNO (District Network Operator). It can be costly to deviate from this agreement, with a very real risk that the agreed capacity may be lost. There must therefore be an appreciation of this limit to site search assessments, with the effect that the search area must be centred on the point of agreed connection to the electricity distribution network, and the search radius based on the costs of connection, and therefore viability.

Coombe Bissett Solar PV Park Limited (British Solar Renewables) has undertaken a high level assessment of anticipated connection costs against possible output and determined that a cable run of up to 2.5 km from the grid connection point at the south eastern corner of the Bake Farm site would be commercially viable. The relevant agricultural land grades within this search area is again shown on figure 1. This area extends to approximately 1963.49 ha and, as defined by published Natural England ALC mapping, comprises:

- 0 ha Grade 1 agricultural land, equivalent to 0 % of the total area
- 161.03 ha Grade 2 agricultural land, equivalent to 8.2% of the total area
- 1523.19 ha Grade 3 agricultural land, equivalent to 77.58% of the total area
- 112.98 ha Grade 4 agricultural land, equivalent to 5.75% of the total area
- 166.29 ha urban land, equivalent to 8.47% of the total area

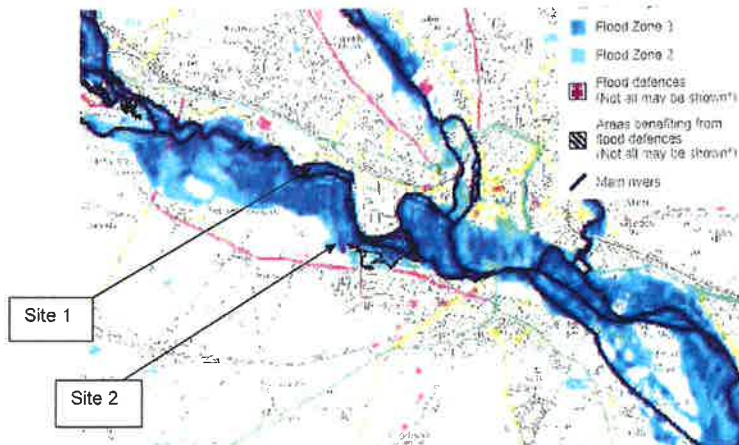
In order to determine which land parcels may be suitable for solar farm development, a desktop GIS analysis was adopted which allowed the systematic analysis, interpretation and output of visual mapping and constraints data from recognised sources such as Natural England. Full details of the exercise are not provided here, but in summary various areas of land were ruled out, most notably due to allocations including Special Areas of Conservation (SAC); Sites of Special Scientific Interest (SSSI); Areas of Outstanding Natural Beauty (AONB) and potential visibility from cultural heritage receptors (using a Zone of Theoretical Visibility to determine likely unacceptable intervisibility). Developer specific requirements such as slope angle and direction were also taken into account. Some of these factors are shown on figure 2.

The results of this assessment are shown at figure 3 which confirms:

- there is no suitable Grade 5 agricultural land within the search area, and no further assessment of such sites is therefore necessary.
- the only Grade 4 land within the search area which passes the GIS assessment is:
 - a 1.284 ha site (labelled as site 1). Further assessment determined that this was located between the River Nadder and River Avon inside the Environment Agency Flood Zone 3 (see below), and therefore at highest risk of flooding; was adjacent to the River Nadder / River Avon SSSI and SAC; and was too small to be viable.
 - a 3.599 ha (labelled as site 2). Further assessment determined that this was located adjacent to the River Nadder inside the Environment Agency Flood Zone 3 (see below), and therefore at highest risk of flooding; adjacent to the River Nadder / SSSI and SAC; adjacent to

Page 4

residential development; and was too small to be viable.



Source: <http://maps.environment-agency.gov.uk>

ALC Grade 3

In respect of Grade 3 land, the GIS analysis has identified 1,523 hectares of land within the search area. Of this 321.1 ha has been determined by the GIS analysis to be potentially suitable for solar development. However, because this land is of a similar grade to the Bake Farm site, and given the context of the relevant policy set out in paragraphs 7.40-7.43 of the SDLP that only the **irretrievable loss of grade 1, 2 and 3A is to be resisted**, no further assessment is deemed necessary.

Notwithstanding the above, it is possible that some of this land may be wholly 3b. However, to reach such a conclusion would require an intrusive survey taking significant land grade samples across the 321 ha of land which is in various ownerships, resulting in significant time and cost. This is not considered a reasonable approach, resulting in burdens of significant time and cost that would not be proportionate to the scheme proposed. Given the context of the SDLP policy at para 7.41, no further analysis is deemed necessary.

Conclusion

The NPPF and Planning Practice Guidance do not place a blanket restriction on the development of agricultural land, but do require that applicants demonstrate that *'poorer quality land has been used in preference to higher quality land'*. This assessment concludes that there are no other suitable poorer quality sites (agricultural land classification grades 4 or 5) within the search area (on the basis of the available Agricultural Land Classification information) and that the Bake Farm Solar Farm application therefore complies with this guidance requirement.

In addition, the SDLP policy requirement that grade 1, 2 or 3A land is not irretrievably lost has also been complied with as the solar farm is fully reversible on the cessation of use. In addition the main part of the site is also capable of grazing during its operational phase of use, and biodiversity benefits will accrue in respect of the landscape and other improvements to the site boundaries. These can be secured by planning condition.

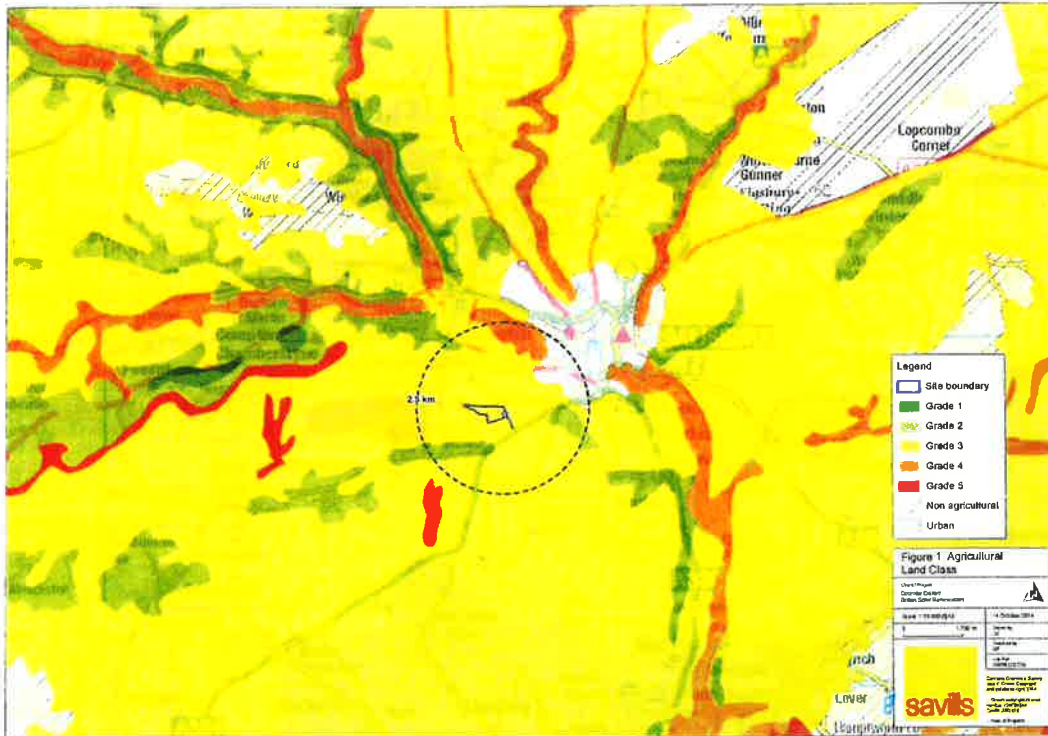


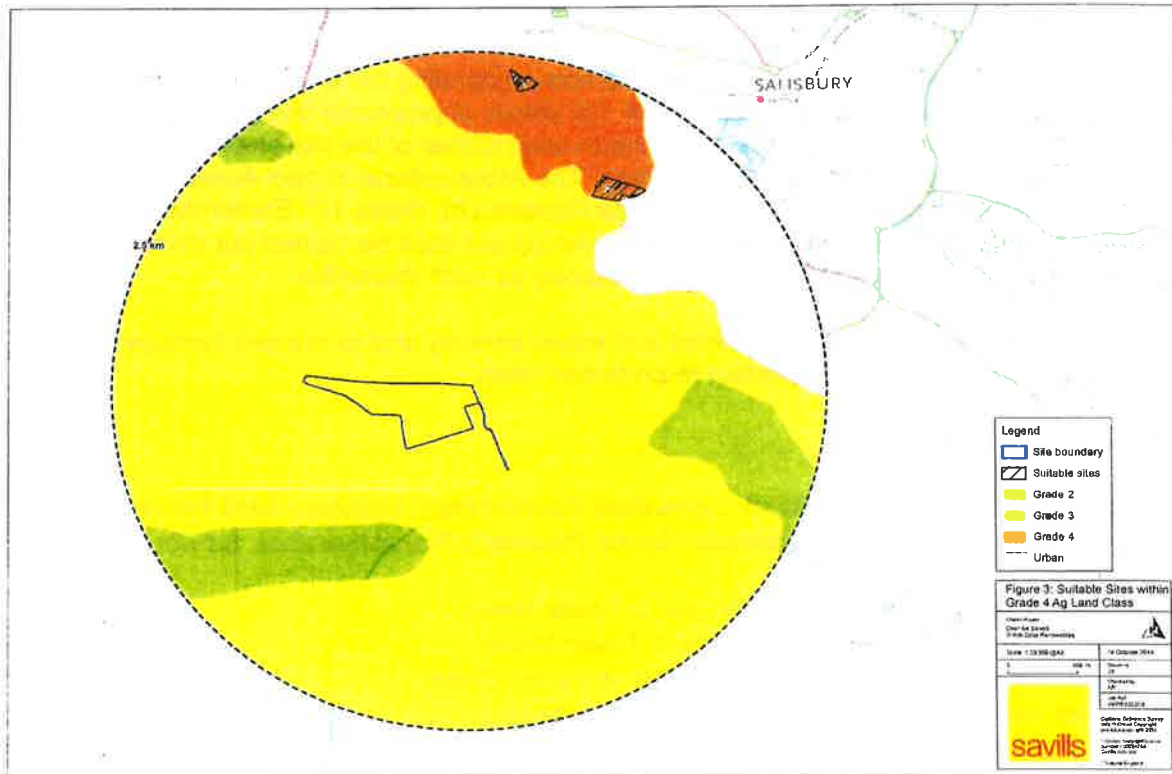
We trust that you find this information of use.

Yours sincerely

Andrew Fido
Associate Director

Figure 1: Sub-regional extract from published Natural England ALC map
Figure 2: 2.5km search area extract from published Natural England ALC map
Figure 3: Results of GIS analysis – suitable sites within 2.5km search area





Agenda Item 7b

Plan List Item 2 14/07557/FUL – Erect 3 Bedroom Dwelling re At 10 Ventry Close, Salisbury, SP1 3ES

1. Amendment to Recommendation:

Approve: Subject to the applicant entering a Section 106 Agreement in respect of Policy R2 (Public Open Space contribution).

2. Additional Condition:

Prior to commencement of development, and notwithstanding the proposed levels details set out on drawing no. SITE/01 dated 23 July 2014, full details of proposed levels and any retaining and/or boundary structures relating to the north-west corner of the site shall be submitted to the local planning authority for approval in writing. The Arboricultural Impact Assessment and Tree Protection Scheme to BS 5837:2002, by Tree Reports Ltd, dated 12th September 2014 shall be updated to include the revised details. The development shall be carried out strictly in accordance with the approved details and retained as such thereafter.

REASON: In the interests of residential and visual amenity and to prevent damage or inappropriate work being undertaken to protected trees.

3. Six letters received:

- Supporting letter from Dr. J. Baird, Consultant Paediatrician, Salisbury NHS Foundation Trust
- Supporting letter from Ms. F. Osmond, Senior Paediatric Physiotherapist, Salisbury District Hospital
- Objection letter and drawings Mr. R Law, 2 Tower Mews
- Two objection letters from Ms. C Fuller, 3 Tower Mews
- Objection letter from Mr. & Mrs. A Henning, 4 Ventry Close
- Objection letter from Mr. & Mrs. T Rea, 4 Tower Mews

4. 1 Ventry Close 14/07630/FUL.

Members are advised that a two storey rear/side extension and associated works for No 1 Ventry Close was approved on 6th October 2014 under 14/07630/FUL. The proposals for 1 Ventry Close are not considered to significantly affect the considerations already set out in the report.

Our ref: JB/ah/0932500

Salisbury 
NHS Foundation Trust

Salisbury District Hospital

Salisbury
Wiltshire
SP2 8BJ

Email: becky.jones@wiltshire.gov.uk
Becky Jones
Planning Officer

Tel: 01722 336262
Ext. 2311

15/10/14

NHS No.

Dear Becky

Re: Miss Sophia Thursby (d.o.b. '2013)
61 Castle Well Road Old Sarum Salisbury Wiltshire SP4 6FT
Tel No:
Planning reference no: 14/07557/full
10 Ventry Close, Salisbury, Wiltshire

I am writing as the Consultant Paediatrician for Sophia Thursby to support the proposed development of a new adapted building by her parents.

Sophia is a baby with very significant developmental, visual and medical problems. Her life threatening apnoeas (stopping breathing) have posed a major problem for the parents in looking after her themselves and caused difficulties in organising care for her.

Sophia and her family need the maximum support they are able to achieve in the most appropriate home environment.

I fully support their application. Please contact me if further details are required.

Yours sincerely

Dr Jim Baird
Consultant Paediatrician

Cc: Parent/Guardian of Sophia Thursby

For further information, see our website on: www.salisbury.nhs.uk

ABC

**Children's Therapy Department
Salisbury District Hospital**

Salisbury
Wiltshire SP2 8BJ

Our ref: FO/PC/0932500

Becky Jones
Planning Officer

Direct Line: 01722 425280
Telephone: 01722 336262 ext 2280
Fax: 01722 425284

02/10/14

NHS No.

Dear Becky Jones

**Re: Planning Reference No: 14/07557/full
10 Ventry Close, Salisbury, Wiltshire**

I am writing in my capacity as Children's Physiotherapist regarding the proposed development of a new adapted building under the above planning reference. I can confirm that an appropriate building enabling the family to accommodate specialist equipment for positioning and mobility and activities of daily living, along with design to meet visual impairment needs will be extremely beneficial to the family and their child. The location of this build being close to family members will provide vital support to parents during times of illness, seizures and when resuscitation may be required.

I hope this information will be helpful in supporting the planning application for this family who are coping with a child with significant additional needs.

Many thanks
Yours sincerely

**Fiona Osmond
Senior Paediatric Physiotherapist**

CC File

The Parents/Guardian of Sophia Thursby
61 Castle Well Road
Old Sarum
Salisbury
Wiltshire

For further information, see our website on: www.salisbury.nhs.uk

Application number: 14/07557/FUL

Response to the Report to the Area Planning Committee – Report 2 Becky Jones

I am the owner of 2 Tower Mews and request that this document is included in the papers for the Chairman and Members of the Area Planning Committee for the meeting 16 October 2014 Salisbury.

I totally support and endorse the comments made in her submission dated 11th October by Clare Fuller at 3 Tower Mews, regarding inaccuracies in the Planning Officers Report to the Committee. A solid house is a very different proposition compared to (largely) deciduous trees!

Additionally I would like to correct a significant misrepresentation/ and /or miscalculation that I believe has occurred in that Report: I refer to section 9.3 of the report under the heading "Tower Mews". The last sentence in the first paragraph of this section together with the statement in paragraph 6, which reads..."Furthermore, the propose development would be set at a lower level than these (Tower Mews) properties –almost 0.5 metres below measured at the boundary fence plinth – which would further reduce its visual impact, are, I believe both inaccurate and misleading. The ground level at 10 Ventry Close by the boundary is 0.7 metres higher than the ground level at 2 Tower Mews. If the building starts at 0.5 below the ground level at that boundary, then in fact it is 0.2 metres **higher** than ground level at 2 Tower Mews. Therefore when viewed from 2 Tower Mews the house will in fact stand 7.6 meters **PLUS** 0.2 metres = 7.8 metres above ground level at 2 Tower Mews.

I have measured the height to the top of the fence at the boundary between 2 Tower Mews and 10 Ventry Close and it is 2.6 Metres. The proposed house will therefore exceed and protrude above the top of the boundary fence by 5.2 metres (just over 17ft). Bearing in mind at its closest the building will only be 1.4 metres (4ft 7") distant from the boundary (at 3 Tower Mews) – this will clearly have a significant and overbearing impact to residents in these Tower Mews properties.

In support of the above, I attach the applicants drawing ref Section 1 dated 21/08/014 renaming this as "RPL/1 Section showing Fence" and, using the same scale as the drawing I have illustrated 5.2 metres from the apex of the roof down to the level of the boundary fence to clearly illustrate what will be visible above our existing boundary fence.

I will also attach a photograph looking south from 2 Tower Mews on to the proposed site showing the current outlook (Clear Blue Sky) and a measure of how the house will impact on this outlook (Blot on Landscape). The point of this latter photograph is that it shoes me standing on my shed at the level of the height of the boundary fence. I am 1.85Metres tall...the proposed dwelling will be 5.2 Metres taller than the fence top..... at 17ft that is almost 3 times taller than I am! This gives a better understanding of just how prominent and daunting this building will be from a Tower Mews perspective (Ref Policy G2).

I would also draw the committee's attention to the drawings submitted by PS Architects illustrating the likely views from various Tower Mews properties Attached as "PSA Drawings"). It can be seen that these drawings give a reasonable representation of how the house will look.

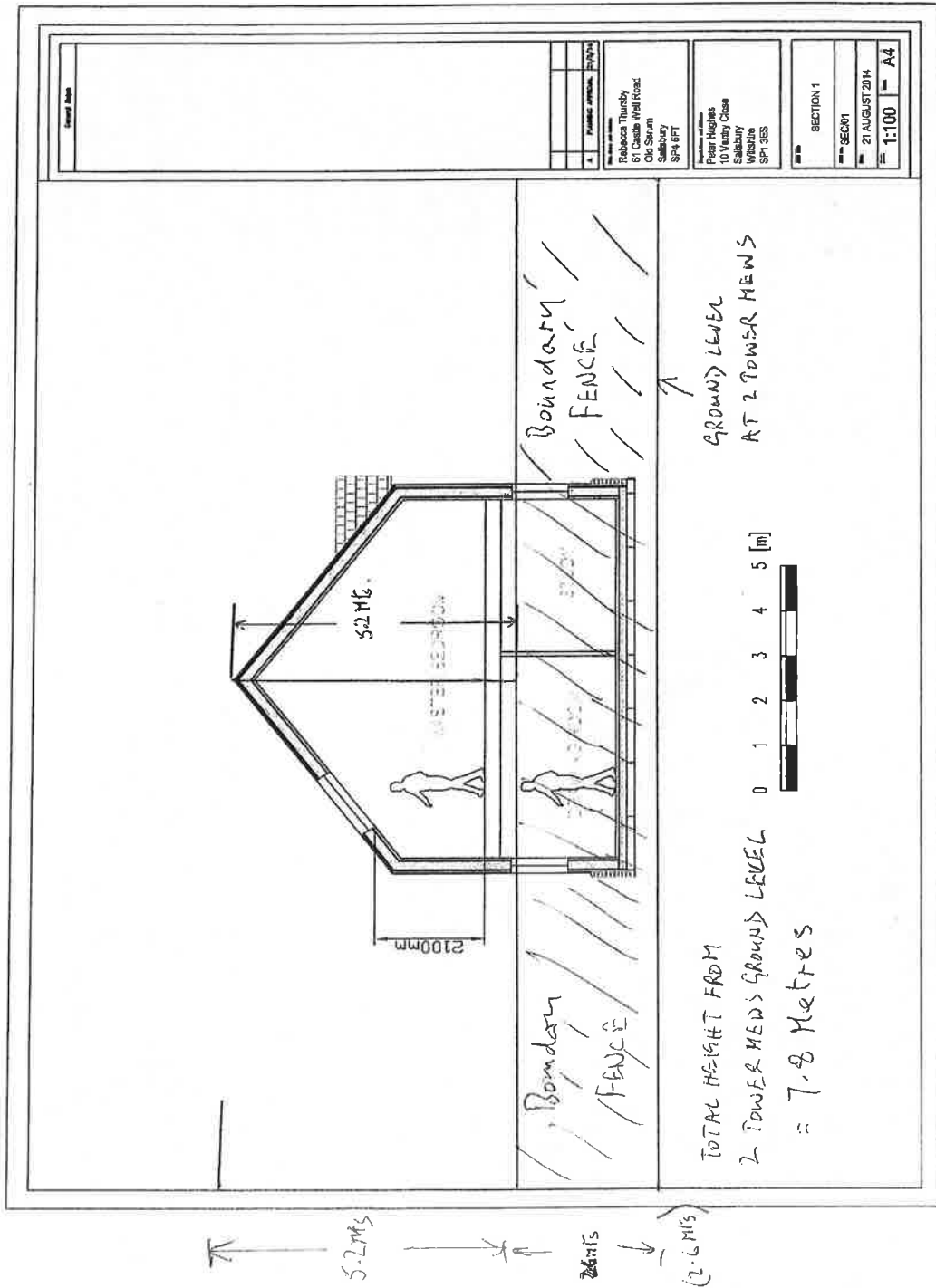
I believe the drawings submitted by the applicant in the above connection to be inaccurate and biased.

On visual inspection on site, it becomes blatantly obvious that in direct contravention of Housing Policy G2, the proposal will "Disturb, interfere, conflict and overlook adjoining properties, to the detriment of existing occupiers". And furthermore, that this detriment will be significant.

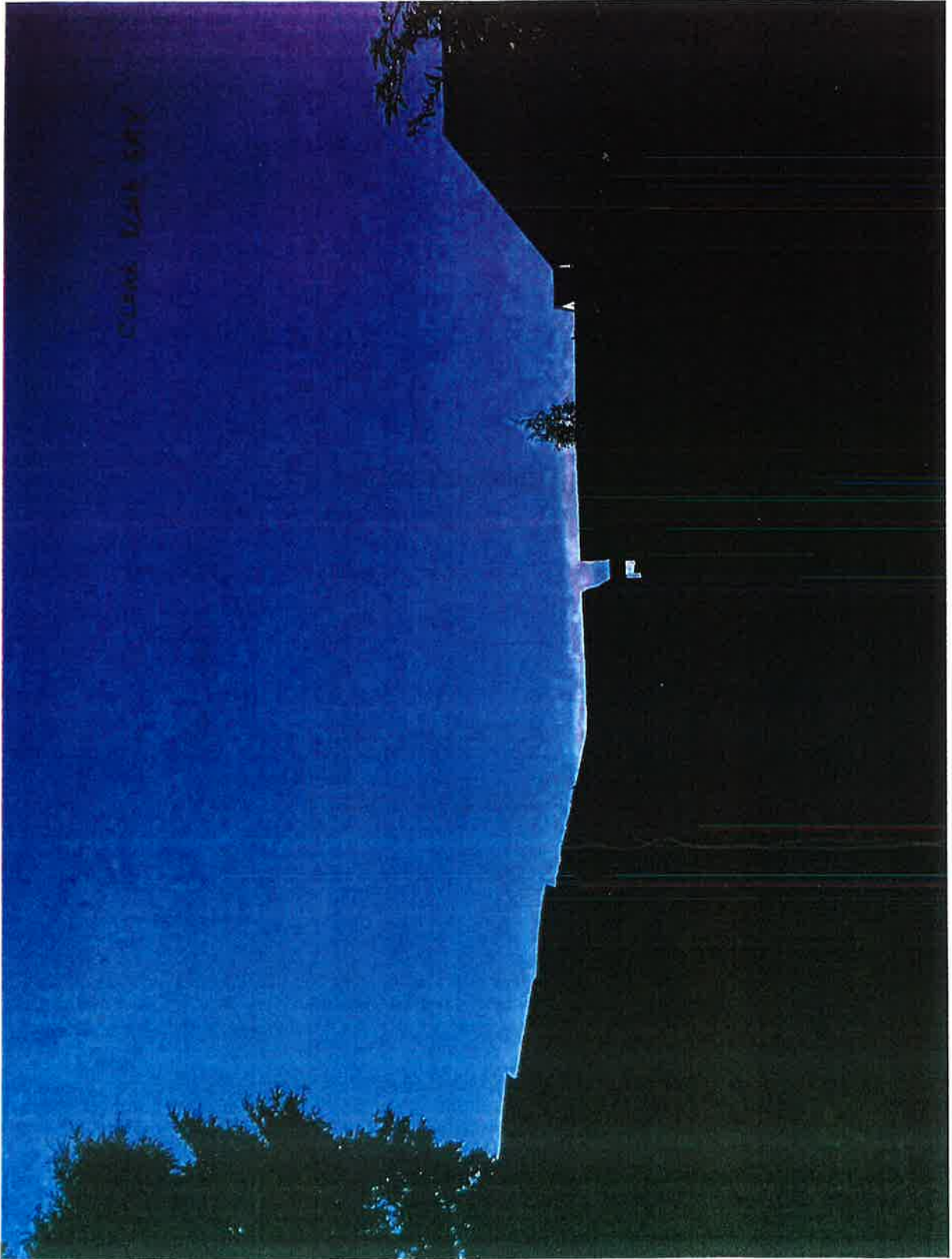
There is also the point that the applicants existing house at 10 Ventry Close is also undoubtedly disturbed, interfered with, conflicted and overlooked by this proposal, to the detriment of existing occupiers. This being the case, can it really be correct that Wiltshire Planning Policy G2 can be ignored or overlooked simply because the occupant of the nearby house does not object to a proposal. When considering this G2 Policy requirement, surely the question is simply "Are the G2 Policies contravened?" and not, "Has the occupier of the nearby property objected?"

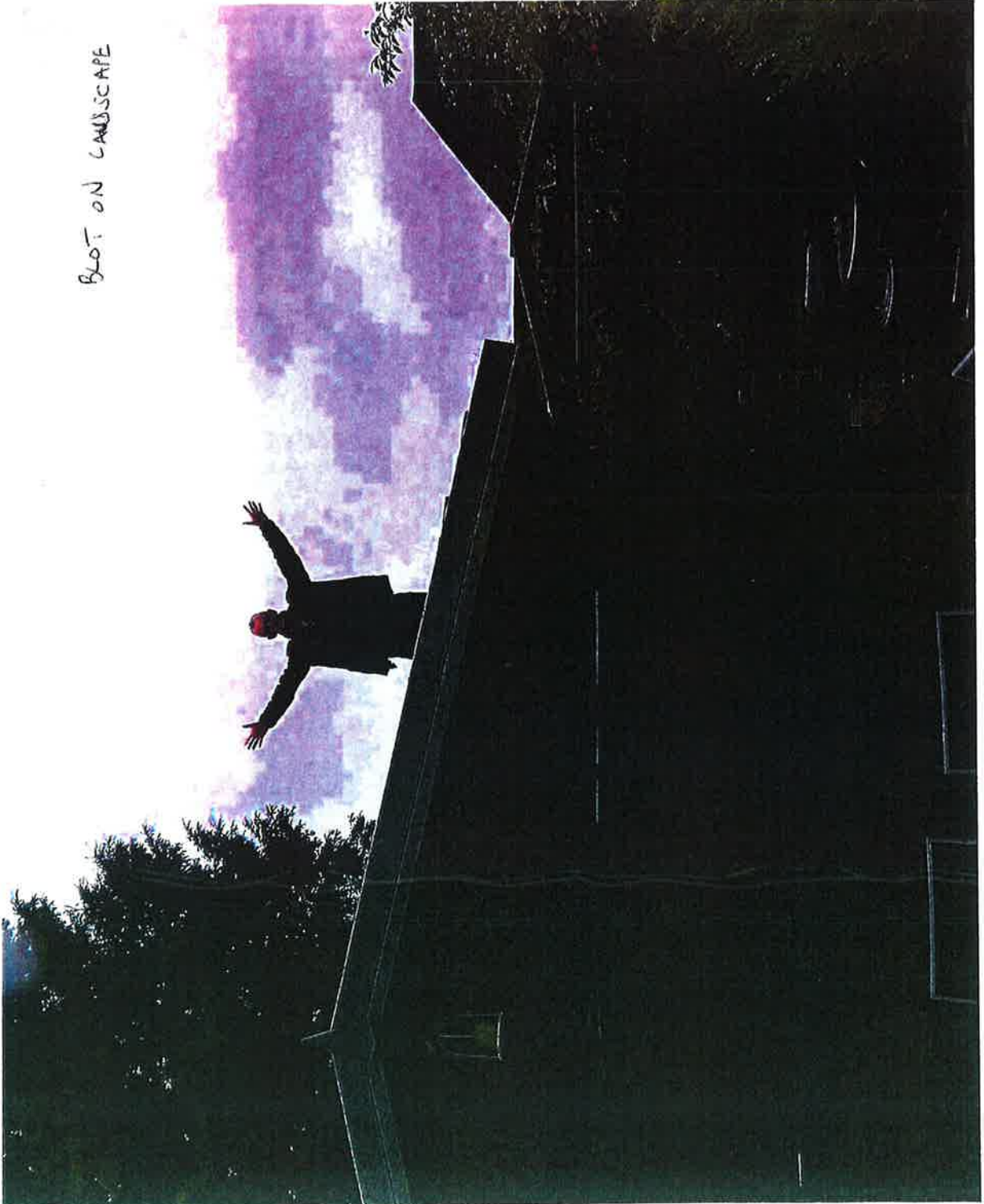
I would ask that this application be strongly rejected on the planning policy reasons stated.

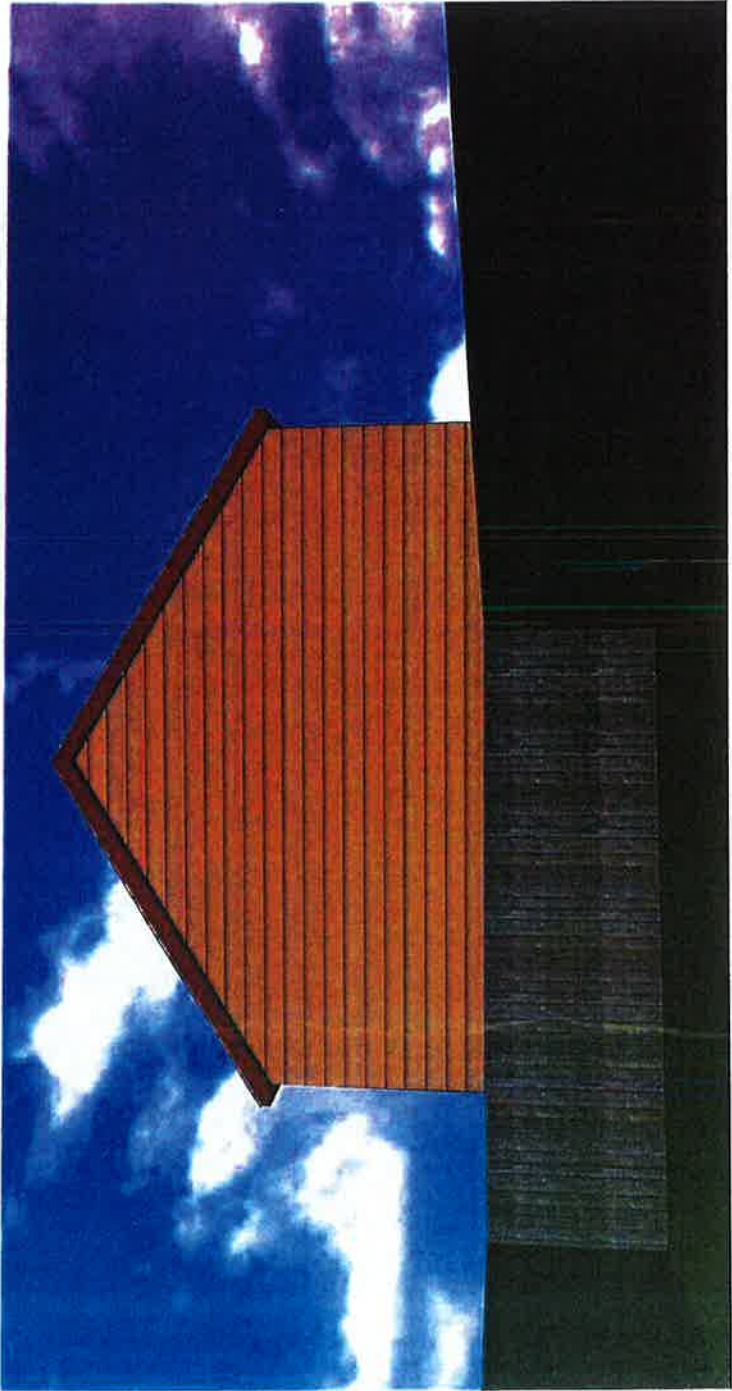
Robert Law 14.10.2014



ADDITIONAL CORRESPONDENCE
 SOUTHERN AREA PLANNING COMMITTEE 16th October 2014







Garden View 2 Tower Mews

DRAWING: Garden 2 View

DATE	SCALE	DATE
	1:50	12/10/2014
JOB NO	622	
DWG NO	07	REV



PAUL STEVENS ARCHITECTURE
 108A FISHERTON STREET, SALISBURY
 WILTSHIRE
 SP2 7DY
 Tel: 01722 345364
 Fax: 01722 331576

DO NOT SCALE DRAWING
 ALL DIMENSIONS TO BE
 TAKEN FROM THE DRAWING



Garden View 3 Tower Mews

DRAWINGS	
Garden 3 View	
SCALE	DATE
622	
NO. 622	
REV	
08	

PSA *Architecture*
 PAUL STEVENS ARCHITECTURE
 11 WILKINSON STREET, SALISBURY
 WILTSHIRE
 SP2 7JY
 Tel No: 01722 348984
 Fax: 01722 341510

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 UNLESS OTHERWISE INDICATED



Aerial view

PSA
 PALLSTEVENS ARCHITECTURE
 100A FISHERTON STREET, SALISBURY,
 WILTSHIRE
 SP4 7DT
 Tel: No: 01722 349384
 Fax: 01722 331376

DATE	DATE	REV
03/10/14	03/10/14	03

DRAWING: Aerial View
 PROJECT NO: 622
 SHEET NO: 03

ALL DIMENSIONS IN METERS UNLESS
 OTHERWISE STATED
 DIMENSIONS TO FACE UNLESS
 INDICATED OTHERWISE

Application number: 14/07557/FUL

Response to the Report to the Area Planning Committee – Report 2 Becky Jones

I am the owner of 3 Tower Mews and request that this document is included in the papers for the Chairman and Members of the Area Planning Committee for the meeting 16 October 2014 Salisbury.

There is a factual inaccuracy in the report that I wish to correct. There was a band of trees, in the garden of 10 Ventry Close, running along the boundary fence between number 10 and 2 and 3 Tower Mews. These were not evergreen, but mixed, mainly deciduous trees, there was a small Yew tree and a very spindly holly. I did not measure them before they were felled, but if any of them were 8 meters high it was only the old laburnum tree. None of these trees were canopy forming, but they afforded privacy as my balconies directly overlook the house and garden of 10 Ventry Close. When these trees were felled, August 2014, I noticed a significant increase in light in my kitchen (ground floor).

I do not agree with the assertion that a 7.6M high and 8.8m wide house, which is solid and will not let any light through can have minimal impact on my light compared to the band of trees most of which lost their leaves in winter and allowed winter light into my kitchen and first floor living room.

As stated in my response to the application, the houses in Tower Mews have first and second floor balconies and our living areas face into the garden, which is only 12M long and 6M wide, it is a small town garden. I will be directly impacted by this proposed building which will be only 1.4M from my boundary fence. When sitting in my garden or on my balconies this building will be imposing, it will have a significant negative impact on my enjoyment of my home.

I also feel that for the future owners of 10 Ventry Close this proposed development will completely overlook the house, conservatory and garden, in very close proximity. These properties will be sold independently, not one as an annex of the other.

I concur with the opinion of the Salisbury Councillors that this represents an over development of the site.

Clare Fuller 11.10.2014

Application number: 14/07557/FUL

**Response to the Report to the Area Planning Committee – Report 2
Becky Jones**

I am the owner of 3 Tower Mews.

Sorry to trouble you with a second submission.

Reading through the reports again I have a question.

The applicant states that the new house occupies 31% of the plot. Can I ask then please if the shape of the house and its positioning on the plot be revised. My garden is below the level of the garden of number 10, which adds another meter to the perceived height of the house. As I have stated in my previous letter, my garden is only 12M long. To have a house that is 7.658M high, that will be experienced as 8.658M high just 1.4M from my boundary will be intrusive, because that is the direction in which my house and all my living rooms face. Currently the garden for the proposed house is in front of the property adjoining Ventry Close.

Yours faithfully, Clare Fuller

Re: Planning Application Number 14/07557/FUL – 10 Ventry Close, Salisbury, SP1 3ES

We are the owners of 4 Ventry Close, and write in response to the following documents:

- 'Report To The Area Planning Committee' – Report No. 2 published on the planning website on 2 October 2014
- The two letters from the NHS professionals dated 2 October and 9 October 2014, published on the planning website on 9 October 2014.

We will also refer to:

- The Salisbury City Council strong objection to the application, published on the planning website on 30 September 2014
- The pre-planning advice (Ref 14/04977/Preapp) by Mrs B Jones dated 19 June 2014

Please arrange for our response to be included in the papers for the Area Planning Committee meeting on Thursday 16 October 2012 at 6-00pm in the City Hall in Salisbury.

Comparison with what could be built without the need for planning permission

The document (Report To The Area Planning Committee) makes specific reference to the fact that permitted development rights allow for outbuildings covering up to half of the garden to be erected without planning permission, providing they do not exceed 4 metres in height. The document states "This provides a fallback position for considering the impacts of the proposal and the principle of developing in the garden." We, and we are sure many others, recognise that there is a very significant difference between the erection of outbuildings and the erection of the proposed dwelling. These differences include:

- a) height (the proposed property would be 7.6 metres tall, which is almost twice the height of that permitted for any outbuilding without planning permission – this is a key issue, as the proposed property will 'tower over' and overlook other dwellings to the detriment of existing occupiers, which is contrary to Policy G2);
- b) distance from the boundary with Tower Mews properties – the proposed development will be sited as close as 1.4 metres from the boundary, which is closer than that permitted for an outbuilding of 4 metres height without planning permission;
- c) the proposed new dwelling would introduce an additional dwelling into Ventry Close;
- d) the proposed new dwelling includes provision for additional vehicular access

Materials and Design

With regard to the materials and design of the proposed property, the pre-planning advice states "Given that this is a very prominent location, care would be needed with the design of the dwelling

and materials, particularly the front elevation, to ensure that it closely reflects the design and appearance of other dwellings in the Close.”

However, the Report to the Area Planning Committee contradicts this advice – it states: “The style in Ventry Close is very mixed. Materials include brick, render, stone and Tudor style detailing, but in general, all the dwellings are large, detached two storey family homes. For this reason, officers considered that the approach taken to give the dwelling the appearance of a converted outbuilding in the garden of No 10 was appropriate, as it ensured that the new dwelling would not compete with the very different but distinct styles of Ventry Close.”

We would state that all of the properties in Ventry Close are predominately built of brick, with some features (small areas of rendering with ‘Tudor-style’ detailing) – there is no stone – none are as ‘varied’ as indicated in the above text. In addition, the proposed acceptance of a dwelling with the appearance of a converted outbuilding is contrary to the pre-application advice that in particular the front elevation should closely reflect the design and appearance of other dwellings in the Close.

Salisbury City Council’s ‘strong objection’ to the application

In the pre-planning advice (Ref: 14/04977/Preapp), Mrs B Jones states that ‘The City Council would also be consulted as part of the application and their views would be taken into account.’ We note that Salisbury City Council discussed this application in their meeting on 15 September 2014 and concluded that “SCC objects strongly to this application on grounds of overdevelopment of the site, highway safety and damage to mature trees”. This information was published on the planning website on 30 September 2014, before the date of publication of the ‘Report To The Area Planning Committee’. However, it appears that, despite acknowledging that the City Council would be consulted as part of the application process and their views taken into account, their strong objection to this application has not been acknowledged in the ‘Report To The Area Planning Committee.’ We would suggest that the strong objection by SCC is relevant material in this application, and thus would be expected to be included in the report to the Area Planning Committee.

Publicity

Regarding the publicity, the ‘Report To The Area Planning Committee’ states that 24 letters of objection/comment (from all neighbouring properties) have been received. None of these letters were ‘comment’ – they were all ‘objections’.

Fully hipped roof

The report to the area planning committee states that the proposed property is not considered to be overpowering or unduly dominant ‘given that the roof is fully hipped’. However, our inspection of the plans suggests that this statement is not true, as the plans show a traditional ridge roof, running

the full length of the property, with end gables (not hips). All the other properties in Ventry Close have some hipped ends to their roof.

Reduced level of privacy for the occupiers of No. 10 Ventry Close

The Report To The Area Planning Committee states 'the new dwelling is likely to have the most significant impact on the existing dwelling and garden at 10 Ventry Close, and likely to result in some overshadowing and overlooking to the rear garden area, and lead to occupiers of No.10 having a reduced level of privacy.' The statement could potentially mislead the reader into thinking that, as the occupiers of the worst affected property have not objected, then surely there is no issue to any of the objections. However, as it is No. 10 who have submitted this application for an additional property for their daughter (Mrs R Thursby), they are highly unlikely to object to their own application.

Medical advice

Two letters supporting the planning application have been written by NHS professionals. The letter of 2 October 2014 by Fiona Osmond refers to supporting 'the proposed development of an adapted building', and the letter of 9 October 2014 by Dr Jim Baird refers to supporting 'the proposed adaptation of a building by her parents.' Neither letter supports the erection of an additional new property in Ventry Close; they merely support the adaptation of an existing building. This is entirely consistent with the suggestion made in the pre-planning advice letter of 19 June 2014 which asked the question "Has the provision of an annexe been considered?"

Andrew and Allison Henning

13 October 2014

We live at 4 Tower Mews, and would request that this document is included in the papers for The Chairman and Members of the Area Planning Committee for the meeting on Thursday 16 October 2012 at 6-00pm in the City Hall in Salisbury. It is in reply to the document issued by the Salisbury Planning Officer.

1. Salisbury City Council. The findings of the recent meeting objected strongly to this application. The Councillors for this Ward have visited and viewed the site and are in agreement that the proposed house overdevelops the site and does not enhance the area.

2. Submissions. 24 against....Zero for. The submissions are from all the surrounding neighbours, who are closely affected. Some of the contents of the submissions appear to have been skated over in the report.

3. Planning Policy No2. This policy seeks to ensure that the development would avoidunduly disturbing, interfering, conflicting with or overlooking adjoining properties. As can be seen from the submissions, building the proposed house would conflict with all these conditions. It is stressed that our principle living rooms overlook our back garden and our privacy and enjoyment, particularly from our balcony area, will be severely disturbed, interfered with and overlooked.

4. Report para 9.1 "Outbuildings". This paragraph states that No 10 could cover up to half its garden area with outbuildings. Outbuildings are of a temporary nature. The proposed house will be permanent, significantly taller, larger, and covering an area more than half the garden. There is already a large outbuilding which is not 2 metres from our boundary. On the drawings the area of the existing conservatory of No 10 is not being shown.

5. Report para 9.3. View from 4 Tower Mews. In the report it states " Whilst occupiers of 1 and 4 Tower Mews would be aware of the development.....not sited directly in line.....an oblique relationship.....some impact on outlook....etc. This is a strange statement. Of course we will be aware, every time we look out of the window, every moment we are in the back garden, we see both back and side of the proposed building. THIS WILL NOT BE AN OBLIQUE RELATIONSHIP !!!!!!! and we will experience a real and considerable impact hourly/daily.

6. Report para 3 sub para 4 Impact on residential amenities. Our outlook will certainly not be improved as there is a significant difference between a belt of trees, with gaps, mixed leaves, seasonal changes, birds nesting, and a solid unadorned brick wall.

In summary, with all the surrounding neighbours entering submissions against the application, and a firm rejection from the SCC we sincerely hope and trust that our views will be taken seriously and the planning application firmly refused.

Tony and Pam Rea 4 Tower Mews SP1 3DJ

Agenda Item 7c

**Plan List Item 3 14/06726/OUT – Demolition of some existing buildings and cessation of business. Erection of a dwelling all matters reserved save for access, scale and siting
At Farmer Giles Farmstead, Teffont, Salisbury, Wiltshire, SP3 5QY**

5. Two letters received:

- Letter of objection from The AONB Partnership
- Letter of Support from the agent

14/06726/OUT

Farmer Giles Farmstead

Hello Andrew

I have read your report on this proposal that is linked to Cllr Deane; doubtless you are aware of Cllr Deane's involvement in AONB matters over the years. Second-hand comments reportedly from this AONB that are not in our written submission [or from our Director or myself] should, of course, be treated with great caution.

By the way, it looks to me that the 'Application Site' label on page 104 of the committee package is pointing not to the site but to an open field on the opposite side of the road.

This AONB has been very concerned about the number of comments made about landscape matters and landscape impacts [or lack of them] in the application without any supporting evidence. On behalf of the AONB I advised that a landscape and visual appraisal should be undertaken by a professional landscape architect to assist you with your assessment of the application. Without that appraisal your statements about the balance between the impacts on the character of the AONB and the local landscapes and the benefits of the scheme have no more evidential backing than the submitted material. That could facilitate a third part challenge, if objectors are so minded, and that would be more work for all of us!

The Council's Spatial Policy Team's response to the proposal gives particular emphasis to policy 51 of the emerging Core Strategy and the submitted material does not demonstrate how AONB objectives, policies, and actions in the AONB Management Plan have been taken account of. There seem to be quite a number of gaps in the submitted material, especially when the planning assessment comes to a conclusion that there is a case to justify an exception to policy. I therefore repeat my advice that an independent landscape and visual impact appraisal could provide robust support for whatever conclusions you come to, and subsequently the committee's decision.

Such an appraisal would need to review, critically, not just the proposals and their impacts but also the current landscape character and features. That would include an evaluation of the ability of existing landscape features to survive and flourish, and new ones become established, if the development were to proceed.

Regards

Richard Burden BSc DipCons MSc FLI PPLI
Landscape and Planning Advisor (part-time, Mon-Wed)
Cranborne Chase Area of Outstanding Natural Beauty
Shears Building, Stone Lane Industrial Estate, Wimborne, BH21 1HD
Tel: 01725 517417
Click to get our web site and AONB Management Plan



Dear Mr Guest
14/06726/OUT
Farmer Giles Farmstead, Teffont, Salisbury, Wiltshire, SP3 5QY

Many thanks for your detailed and balanced report to the Planning Committee. I do note however that objections have been received from the AONB officer and I would wish to undertake a short response to such concerns. I would be grateful if this short note could be added to late correspondence for Thursday's meeting. We will be addressing the Committee within our allotted three minute timescale however there is quite a lot to discuss within such a short time and therefore we respond directly to this issue in writing.

The letter from the AONB officer acknowledges that the proposals result in the removal of the car park and they also support the restoration of this area as paddock however it is questioned as to whether the removal of buildings would be beneficial. It is added also that there is no "source" for the assertion that the car park is visually prominent.

The ratio of area of proposed development to area of demolished buildings is 250 m² for the plan of the house to 2,240m² for the asbestos clad existing buildings. The buildings to demolished buildings are therefore ten times greater in their footprint to that of the proposed house. The car parking is located at the front of the site alongside the road and is visually prominent and therefore we submit both aspects will result in substantial visual benefit to the AONB.

It is stated that these proposals are for a substantial property with associated garage block and whilst the dwelling is large it is smaller in area for instance than the recently constructed Farm House at Field Buildings (S/2012/0098) which is also within the AONB. The design of the dwelling plays close attention to the Village DS which has been adopted by the Council and has been designed to respect local farmhouses.

The AONB officer advances that the loss of the Farmer Giles Farmstead facility would impact on the rural economy of the locality. We have identified that this use generates limited employment and its removal would bring about substantial improvements to the AONB and the Village, a fact acknowledged in the support of the scheme by Teffont PC.

The issue of traffic is also raised and it should be noted that customers to farm parks/attractions come from nearby urban areas, Salisbury & Warminster in this case. The former is served by the B3089 which passes through Teffont and the easiest route from the latter is down the A350 through Longbridge Deverill. The site has had up to 35,000 visitors a year which is roughly equivalent to 85,000 car trips to and from the site. This traffic from the local road network much of it through the village would be removed by these proposals and one large dwelling results in circa 2000 movements a year!

In terms of landscape and visual impact these proposals have been through detailed pre-application negotiations with officers to identify a low impact location for the dwelling. The proposed house has been deliberately set into the sloping ground to minimise the height of roof line and such is set against a dense long copse of beech trees known locally as the Beech Walk and is set well back from the road.

We conclude that the scheme will bring substantial visual and ~~other~~ benefits (loss of traffic) to the Village and the wider AONB.

Tony Allen MRTPI