

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

Andrew Bidwell
Wiltshire Council
Development Control South
PO Box 2281
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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We also do not know why the original application was withdrawn and then resubmitted rather than simply amended.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

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.

- 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

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 we believe the former 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 farm 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*

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?"*

In identifying impacts on landscape, considerations include: direct and indirect effects, cumulative impacts and temporary and permanent impacts. When assessing the significance of impacts a number of criteria should be considered including the sensitivity of the landscape and visual resource and the magnitude or size of the predicted change. Some landscapes may be more sensitive to certain types of change than others and it should not be assumed that a landscape character area deemed sensitive to one type of change cannot accommodate another type of change.

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.

The English Heritage website provides information on undertaking historic landscape characterisation and how this relates to landscape character assessment.

The bullets below set out the type of information that can usefully inform assessments.

Information to inform landscape and visual impact assessments

- a base plan of all existing windfarms, consented developments and applications received, showing all schemes within a defined radius of the centre of the proposal under consideration*
- for those existing or proposed windfarms within a defined radius of the proposal under consideration, a plan showing cumulative 'zones of visual influence'. (A zone of visual influence is the area from which a development or other structure is theoretically visible). The aim of the plan should be to clearly identify the zone of visual influence of each windfarm, and those areas from where one or more windfarms are likely to be seen*
- the base plan and plan of cumulative zones of visual influence will need to reflect local circumstances, for example, the areas covered should take into account the extent to which factors such as the topography and the likely visibility of proposals in prevailing meteorological conditions may vary*
- maps of cumulative zones of visual influence are used to identify appropriate locations for visual impact studies. These include locations for simultaneous visibility assessments (i.e. where two or more schemes are visible from a fixed viewpoint without the need for an observer to turn their head, and repetitive visibility assessments (i.e. where the observer is able to see two or more schemes but only if they turn around)*
- sequential effects on visibility occur when an observer moves through a landscape and sees two or more schemes. Common routes through a landscape (e.g. major roads; long distance paths or cycle routes) can be identified as 'journey scenarios' and the proposals impact on them can be assessed*
- photomontages showing all existing and consented turbines, and those for which planning applications have been submitted, in addition to the proposal*

under consideration. The viewpoints used could be those identified using the maps of cumulative zones of visual influence. The photomontages could be annotated to include the dimensions of the existing turbines, the distance from the viewpoint to the different schemes, the arc of view and the format and focal length of the camera used

- *at the most detailed level, description and assessment of cumulative impacts may include the following landscape issues: scale of development in relation to landscape character or designations, sense of distance, existing focal points in the landscape, skylining (where additional development along a skyline appears disproportionately dominant) and sense of remoteness or wildness"*

South Wiltshire Core Strategy

3.6 The Environmental Statement refers to the South Wiltshire Core Strategy (**SWCS**). It states that there are a number of key policy provision in the SWCS relevant to applications for renewable energy. It cites only one of these, and this it cites selectively (see reference to para 3.11 at sub-para (f) below). Some of the additional key policy provisions are cited below:

- "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))*
- "Ensuring the special characteristics of south Wiltshire's environment are not harmed by increased growth is a key challenge. The Topic Papers detail the many international, national and locally protected habitats, landscapes and buildings, which make Wiltshire an extraordinarily valued and constrained environment" (para 3.8)*
- "The principle pressure to be addressed is ensuring that the new strategic growth required to meet local needs does not erode the separate identity, character and visual and functional amenity of settlements . . . Outside of the principal growth areas, similar pressures apply and the challenge is to allow the growth necessary to meet local needs while having full regard to the conservation objectives of the valued landscapes including the Area of Outstanding Natural Beauty and the New Forest National Park " (para 3.8(a))*
- "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))*
- "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)*
- "As well as providing more sustainable transport choices, there is a necessity to facilitate the increased use of renewable and low carbon energy sources. Together these can go some way towards reducing south Wiltshire's dependency on fossil fuels. **Enabling this type of development has to be balanced against the***

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:

"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*

- (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 PPGRLE 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)

- (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 it 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:

- (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*

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))

- 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.

- 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 Ebbel 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.

- 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

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 - Ebblesham 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)

- (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*".

- 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 (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.*"

- 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*

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 overflowed 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.

- 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)

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 MV 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.

- 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 comfort 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 Office, 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 to 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*

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.

- 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;

- (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,

Jennifer Epworth and Aster Crawshaw