

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

2 Shergold Cottages
Homington Road
Coombe Bissett
Salisbury
SP5 4LT

12TH October 2014

Planning Application No: 14/06864/FUL

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

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

Dear Committee Member,

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

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

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

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

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

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

It does not provide employment or housing opportunities.

This power station rewards the developer and land owner.

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

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

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

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

This is More Madness than Megawatts

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

In April 2014 he followed up this directive to all planning offices making clear the Department of Energy and Climate Change (DECC) had serious concerns regarding solar farms on Greenfield sites, confirming that, "I do not want uncontrolled expansion of solar on the countryside. The main focus for future growth must be onsite generation. That should mean roof top deployment on industrial, commercial and retail rooftops – even car parks and brownfield sites. Putting solar on just 16% of all such buildings would deliver the 20,000 MW" The Target for 2020)" Barker also drew attention to the rampant growth in UK Solar Power capacity, from virtually nothing in 2010 to 3,000 MW in 2013.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

6.38 Wiltshire Core Strategy

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Philip and Linda Buckley

