REPORT FOR STRATEGIC PLANNING COMMITTEE

Date of Meeting	14 August 2024
Application Number	PL/2023/10394
Site Address	Land south of Salisbury Road, Homington, Coombe Bissett
Proposal	Construction and operation of a solar photovoltaic farm and associated infrastructure
Applicant	Low Carbon Solar Park 24 Limited
Town/Parish Council	Coombe Bissett
ELECTORAL DIVISION	COOMBE BISSETT AND HOMINGTON – Cllr Richard Clewer
Type of application	Full Planning
Case Officer	Joe Richardson

Reason for the application being considered by Committee

The application is before the committee at the request of Cllr Richard Clewer in view of public interest / strength of local feeling and landscape impact.

1. Purpose of Report

The purpose of the report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application be approved subject to conditions for the reasons set out below.

2. Report Summary

The application has been subject to consultation and publicity, including site notices, press notices, neighbour notifications and publications on the Council's website. Representations have been received from 67 third party objectors and 3 third party supporters.

The issues in this case are:

- Principle of development considering the 'Rochdale Envelope' approach;
- Decommissioning and Restoration of site;
- Site selection and the loss of best and most versatile agricultural land;
- Cumulative Impact of Solar Farms within Wiltshire and Landscape Impacts;
- Residential Amenity Impacts;
- Ecological Impacts;
- Highway safety;
- Heritage and Archaeological Impacts;
- Flood Risk

3. Site Description

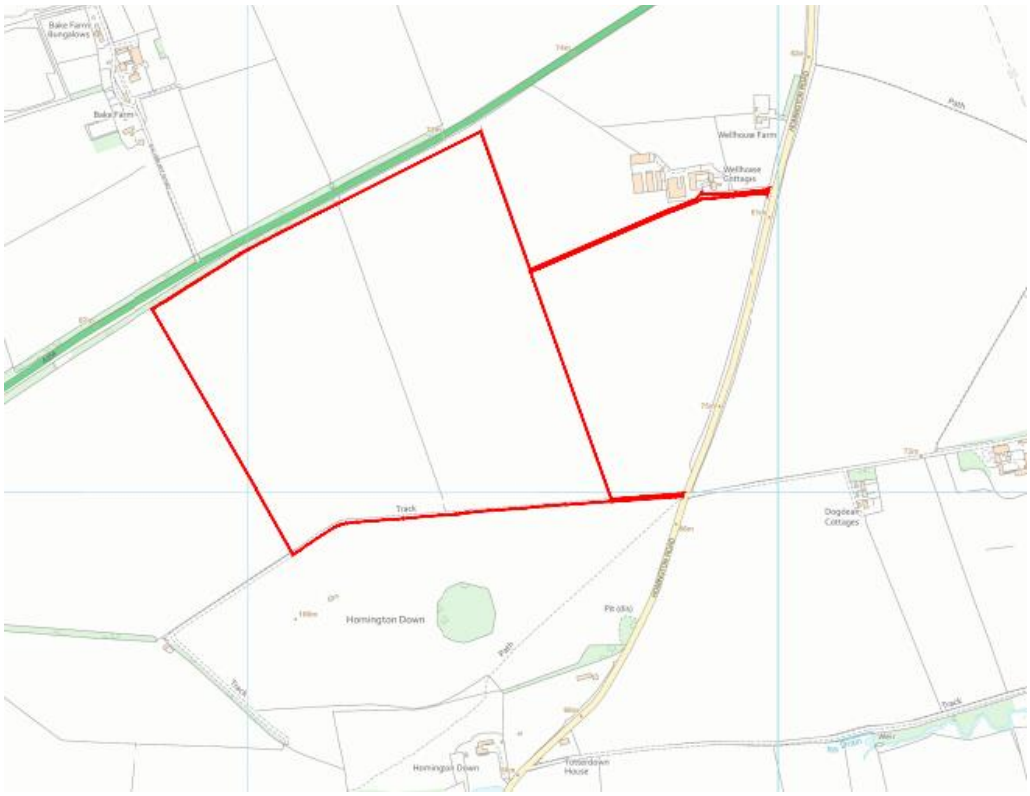
The site subject to this proposal covers approximately 40.4 hectares (ha) of two interconnecting agricultural fields situated on land to the south of Salisbury Road (A354) which

lies to the east of the village of Coombe Bissett, south of Harnham and Salisbury and to the north of Homington. Homington Road is set back to the east, the River Ebble Valley is set back to the south and the Bake Farm solar array is to the north-west.

The 40.4 ha site is situated in the open countryside, to the east of the defined settlement boundary of Coombe Bissett, a large village as defined by the Wiltshire Core Strategy (WCS) policies, CP1 (Settlement Strategy), CP2 (Delivery Strategy) and CP23 (Southern Wiltshire Community Area). The nearest residential settlements to the site include the villages of Coombe Bissett and Homington that are approximately 700 metres to the south and west separated by the Homington Downs and the A354 public highway. To the north west of the site is Harnham Hill which is approximately 1.3kms. Within the site are two designated public rights of way known as CBIS4 and BRIT13. To the south of the site are the public footpaths known as CBI6, CBIS20 and BRIT12. To the north and south of the site are two designated Tree Preservation Orders referenced as S/BRIT/TPO1. There are a number of scheduled monuments within 2km of the site and the Coombe Bissett and Homington Conservation Areas are within 1km to the west and approximately 690 metres to the south.

The site is within the catchment of the River Avon SAC, and is within 13.8 kilometres of New Forest (which is designated as a SAC, Special Protection Area (SPA) and RAMSAR site). The site is located within a special landscape area and is within Flood Zone 1.

The red line plan below shows the site in its context:



The site comprises of two agricultural fields to the south of Salisbury Road (A354) within the agricultural landscape to the east of Coombe Bissett. The agricultural land is classed as Grade 3 and this is covered in more depth later in this report.

The area itself consists of two intensively farmed agricultural fields defined by mature hedgerows and hedgerow trees except to the east where the field boundary is largely open. Public right of way BRIT13 follows the eastern side of the site.

View of site from Farm Track/PROW BRIT13

View of site from Homington Road

View of site from the A354 public highway

View towards Wellhouse Cottages and Wellhouse Farm

4. Planning History

PL2023/03063 - Proposed Solar Photovoltaic Farm and Associated Infrastructure – Screening Opinion – EIA Required 04.05.23

5. The Proposal

The proposal seeks planning permission for the construction and operation of a ground mounted solar farm and associated infrastructure. The proposed development would include the following equipment:

- Rows of solar photovoltaic ('PV') panels;
- Inverters within shipping containers (or similar);
- Operations and Management building;
- Spare parts container;
- Cabling and substations;
- Internal access tracks;
- Perimeter fence and internal fencing; and
- CCTV cameras

The Point of Connection (POC) consists of an existing substation approximately 0.7km to the south of the site (the Homington substation) but this POC does not form part of this planning application and will be submitted by way of a future planning application should this proposal be approved. It is estimated that the solar panels will generate approximately 30 megawatts (MW) of power, enough to supply approximately 9,642 homes per year. The application is accompanied by an indicative site layout plan of the site as shown below. This shows the potential location for panels, inverters, access tracks and other onsite infrastructure.

The submission of this application does not provide all of the design details of the proposed development as a final investment decision will need to be undertaken by the applicant should members be minded to approve this scheme. In the absence of this, the application seeks to incorporate sufficient design flexibility in terms of the dimensions and layout of the structures that include the precise layout of the site and height of the solar panels.

The development zones are shown in the plan below and would define where certain infrastructure is located within the site. The key infrastructure permitted within each zone would be as follows:

Zone 1: Solar panels, inverters and transformers;
Zone 2: Solar panels, inverters/transformers, DNO substation, Operations and Management Building, spare parts container.

6. Local and National Planning Policy

National Planning Policy Framework
Section 2 Achieving Sustainable Development
Section 12 Achieving Well Designed Places
Section 14 Meeting the challenge of climate change, flooding and coastal change
Section 15 Conserving and enhancing the natural environment

Wiltshire Core Strategy
Core Policy 1 Settlement Strategy
Core Policy 2 Delivery Strategy
Core Policy 3 Infrastructure Requirements
Core Policy 24 Southern Wiltshire Community Area

Core Policy 25 New Forest National Park
Core Policy 42 Standalone renewable energy resources
Core Policy 48 Supporting Rural Life
Core Policy 50 Biodiversity and Geodiversity
Core Policy 51 Landscaping
Core Policy 52 Green Infrastructure
Core Policy 57 Ensuring high quality design and place shaping
Core Policy 60 Sustainable Transport
Core Policy 61 Transport and New Development
Core Policy 62 Development Impacts on the Transport Network
Core Policy 67 Flood Risk
Core Policy 69 Protection of the River Avon SAC

Wiltshire Local Transport Plan 2015-2026:
Car Parking Strategy

Saved Salisbury District Local Plan
C6 – Special Landscape Area

Supplementary Planning Guidance:
National Planning Statement for Energy (NPSE)
National Planning Statement for Renewable Energy (EN-1)
AONB Management Plan 2019 – 2024

Written Ministerial Statement 15 May 2024

On 15 May 2024, the last government announced in a written ministerial statement cautioning against approving the construction of solar farms on farmland and advised councils to consider the 'cumulative impact' of new solar farms.

The ministerial statement states:

"Food security is an essential part of national security. This Government is fully committed to delivering robust UK food security and recognises its paramount importance to our national security. This is reflected in our commitment to maintain the current level of food we produce domestically. Heightened geopolitical risk has brought this into sharper focus and we think it is more important than ever that our best agricultural land is protected and our food production prioritised.

Similarly, we have seen our energy security threatened following Putin's illegal invasion of Ukraine with the government spending over £40bn to pay up to a half of people's energy bills. We are combatting this by racing ahead with deployment of renewable energy; nearly half of our electricity today is produced from renewables which is up from only 7 percent in 2010. Solar power is a key part of the Government's strategy for energy security, net zero and clean growth. This position was reinforced in the new National Policy Statement (EN-3), published in January this year, which stated that "Solar also has an important role in delivering the government's goals for greater energy independence and the British Energy Security Strategy states that government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW)".

Government recognises that, in some instances, solar projects can affect local environments which may lead to unacceptable impacts for some local communities. The planning system is designed to balance these considerations against the need to deliver a secure, clean, green energy system for the future.

Protecting the Best Agricultural Land

The new National Policy Statement that we published in January makes clear that "applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible. The Government in Powering Up Britain: Energy Security Plan clarified that while "solar and farming can be complementary" developers must also have "consideration for ongoing food production."

Nevertheless, in balancing both the need for energy security and food production, we are concerned that as large solar developments proceed at pace, more of our 'Best and Most Versatile' (BMV) land could be used for solar PV instead of food production. I am therefore setting out further detail about how our policy on balancing these competing priorities is intended to be applied.

As is outlined in the National Policy Statement, the starting position for solar PV developers in taking forward Nationally Significant Infrastructure Projects is that applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality.

The National Policy Statement can also be a material consideration in determining applications under the Town and Country Planning Act 1990 and is broadly consistent with the approach to agricultural land in the National Planning Policy Framework which states that "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development".

This means that due weight needs to be given to the proposed use of Best and Most Versatile land when considering whether planning consent should be granted for solar developments. For all applicants the highest quality agricultural land is least appropriate for solar development and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary. Applicants for Nationally Significant Infrastructure Projects should avoid the use of Best and Most Versatile agricultural land where possible.

For Nationally Significant Infrastructure Projects, including those already in the system, the National Policy Statement and from today this WMS are likely to be important and relevant considerations in the decision making process. The Government will keep under review the evidence base underpinning the National Policy Statement published in January.

Addressing Cumulative Impacts

While the total area of agricultural land used for solar is very small, and even in the most ambitious scenarios would still occupy less than 1% of the UK's agricultural land, we are increasingly seeing geographical clustering of proposed solar developments in some rural areas, such as in Lincolnshire. When considering whether planning consent should be granted for solar development it is important to consider not just the impacts of individual proposals, but also whether there are cumulative impacts where several proposals come forward in the same locality.

In parallel, my Department will be expanding the Renewable Energy Planning Database to include additional information on the types of agricultural land used by existing solar projects

and those in the planning pipeline. This will enable us to carefully monitor the use of land by renewable projects in all regions of the UK.

Improving Soil Surveys

The Government has heard concerns about the perceived inaccuracy and unfairness of soil surveys undertaken as part of the planning process for solar development. The Government will address this by supporting independent certification by an appropriate certifying body, subject to relevant business case approval, to ensure Agricultural Land Classification Soil Surveys are of a high standard, requiring surveyors to demonstrate meeting an agreed minimum requirement of training/experience. We will also seek to ensure consistency in how data is recorded and presented, so that reports on agricultural land classification are consistent, authoritative and objective."

Local Context:

On 21 May 2024 Wiltshire's Full Council met and carried the following motion;

"*Whilst not opposed to the principle of the development of solar farms in line with the National Planning Policy Framework this Council is increasingly concerned at the concentration of solar farms, battery storage and associated infrastructure in Wiltshire. Some villages are now completely surrounded by solar farms and their continued concentration represents a significant cumulative impact and industrialisation of the countryside.*

Wiltshire Council therefore calls on the Secretary of State for the Department of Levelling Up, Housing and Communities to define more closely what is meant by 'cumulative impact' regarding solar farms battery storage and associated infrastructure and to take clear steps to ensure that solar developments are more evenly spread across the UK and not concentrated in specific areas effectively industrialising the countryside.

We would also ask for clarity of the priority given to ensuring that food production and farming are not destroyed as industries in specific areas through an excessive concentration of solar farms given the massive impact that would have on the rural way of life in villages that have been farmed for time immemorial."

7. Summary of consultation responses

Coombe Bissett Parish Council – Objection with comments summarised as:

1. Connection to the Grid – the application contains no information on how the solar farm will be connected to the Electricity Grid;
2. Loss of Best and Most Versatile Agricultural Land;
3. Highway and Road Safety including:
   a) Site Entry Routes;
   b) Road Safety;
   c) Visibility Splays
4. Ecology
5. Site Restoration

Britford Parish Council – No objection

Salisbury City Council **–** Objection with comments received stating:

SCC comment on the application, reflecting the split views of the committee, raising the following concerns;
• Visual impact on the landscape
• No grid connection
• Loss of agricultural land
• Lack of environmental assessment
• Would like to see Biodiversity net gain should the development go ahead

WC Climate Team - Support with the following comments received:

The climate team actively and strongly encourages developers of all scales to put the mitigation of and adaption to climate change as a golden theme to run through their development project. This is a proposal that is crucial in supporting the council's goal to seek to make the county carbon neutral by 2030. This is a goal set out in the adopted Climate Strategy. The Climate Strategy is part of the council's constitution and is a non-statutory plan of equal standing as the Business Plan. Delivering on the council's climate change commitments will support the delivery of the Business Plan including its own reiteration of the commitment to reducing the county's carbon footprint, an action derived from the council's 2019 acknowledgement of the Climate Emergency. In short, Wiltshire Council has embedded addressing climate change into its constitution and needs to use its spheres of influence, such as its regulatory planning powers to affect positive change. Its statutory planning decision tool, the Wiltshire Core Strategy, provides a positive framework for standalone renewable energy proposals such as this. The proposal will generate a significant amount of renewable energy (circa 30MW), which the developer sets out will provide enough power to service the equivalent of around 9,642 homes. By reducing the need to generate electricity through the burning of fossil fuels, which result in the emission of greenhouse gases, this scheme will mitigate climate change. The science of climate change is now irrefutable, the emission of greenhouse gases, such as carbon dioxide, through human activity is demonstrably warming our climate. The consequences of this negatively impact our economy, our society and our environment. This is an issue at the heart of sustainable development. The delivery of sustainable development is what underpins the planning system. Therefore, the NPPF is clear at paragraph 157 that the planning system needs to support the transition to a low carbon future through shaping places in ways so as to contribute to radical reductions in greenhouse gases. The provision of renewable energy will be key in meeting this challenge. For example, the UK government sets out in its March 2023 document, Powering Up Britain that we will need to aim for a 5-fold increase in solar PV generation by 2035. This means the UK will need up to 70GW of power, enough to power around 20 million homes. Place this into a Wiltshire context, where solar PV has historically been by far the greatest source of renewable energy (Wiltshire County Report – Wiltshire Carbon Emissions Baselines and Reduction Pathways, March 2022), and is set to remain so, then this proposal would represent an early and significant contribution to net zero ambitions. Whilst the delivery of solar PV in Wiltshire has been strong, this is not reflected in other forms of renewable energy, for example wind. The UK government reviewed its national position in the NPPF this year but did not reverse its 'de-facto ban'. The carbon reduction pathway for Wiltshire sets out a reliance on wind coming forward and this now seems unlikely. So, realistically, solar PV will be the main source of renewable power for Wiltshire in the foreseeable future and will need to compensate for the lack of other renewable energy sources in Wiltshire in the transition to net zero. In short, a net zero future for Wiltshire will mean we need more solar on the roofs of buildings, and we will need more standalone installations like this too. It is also important to consider that the developer states that they have secured a grid connection for the development. The PPG acknowledges that grid connection is a significant barrier for delivery of renewable energy. So, that this scheme has an agreed grid connection must weigh positively and will mean that this scheme can make an early and significant contribution to meeting net zero goals. Without these types of

proposals coming forward, providing a pipeline of deliverable projects, society will have an unrealistic task of firstly reaching net zero, but then adapting to the environmental consequences of delayed action. This will include more extreme weather causing overheating and flooding. Issues that will harm our built and natural environments, causing economic, social and environmental loses. This proposal will not only help to decarbonise the grid by the 2035 UK Government target, but it will also support energy security by reducing our reliance of fossil fuels, which are often bought from foreign markets that have become increasingly volatile driving higher energy prices. Furthermore, of particular note is that the scheme could help to deliver strong levels of biodiversity net gain, targeting around 50% habitat improvement and 32% hedgerow improvement. This is well in excess of policy requirements and will help to address the concurrent Ecological Emergency. This relates directly to one of the key criteria for assessing renewable energy proposals set out in the development plan and national planning practice guidance. The development, through the landscaping strategy will provide carbon sequestration too. Indeed, it is clear from a review of the submission that the developer has recognized the need to minimise and mitigate any potential impacts on wider planning considerations. If residual impacts are found in any planning assessment, then the council should be positive and proactive in any discussions with the developer to mitigate impacts as far as practically possible, consistent with paragraph 163. From the design and access statement it is very clear that the developer is open to negotiation on the detail of this scheme. They have already adapted their proposals in light of public consultation and the aims to protect best and most versatile agricultural land for food production. Less than 50% of the site is within the definition of best and most versatile agricultural land, and through the provision of habitat suitable for grazing, then the land will remain in viable food production use. If harm remains, then each benefit of the scheme needs to be apportioned positive weight in favour of granting approval. The annual carbon reductions of this scheme for example ought to be afforded significant weight because climate change is the central issue to be addressed by the development plan and the importance of the issue has only increased since the extant plan was adopted in 2015. Other benefits including the biodiversity net gain in excess of policy requirements needs to be apportioned positive weight too. In conclusion, the proposal will make an early and positive contribution towards net zero targets and mitigating the impacts of climate change through the radical reduction in greenhouse gas emissions. This should be afforded significant weight. Other benefits of the scheme include increasing energy security, high levels of biodiversity net gain, and landscaping to support climate change adaptation and carbon sequestration. These matters should be afforded positive weight in favour of granting the scheme. If any harmful impacts are found, it is clear from the developer's submission and national policy that the council can and should work positively and proactively to address these issues so as to approve the scheme. Where issues cannot be fully addressed, they ought to be minimised ahead of exercising a planning judgement.

WC Archaeology – No objection subject to condition:

First response: initial concerns –

Following early consultation with the Archaeology Service, the applicant has submitted with their application, three reports that evidence the presence of archaeological remains within the red line boundary of this site. These reports comprise:

'Heritage Desk-Based Assessment' report, Cotswold Archaeology, November 2023
'Geophysical Survey Report' Magnitude Surveys, April 2023
'Archaeological Evaluation' report, Cotswold Archaeology, October 2023, revised January 2024

These reports provide an understanding of the archaeological remains that are likely to survive within the site, their significance, and the likely impacts of the proposed development upon

them. The desk-based assessment report concludes that the site has a high potential to contain buried remains of prehistoric and Roman date. The geophysical survey confirmed the presence of widespread buried archaeological remains comprising enclosures, field systems, a trackway, a possible ring ditch and possible extraction pits. The field evaluation, undertaken through trial trenching, principally established the presence of residual earlier prehistoric worked flint, a possible enclosure of later Bronze Age date, two other poorly dated enclosures, a series of poorly dated trackways, field boundaries and lynchets, a possible post-hole structure and several other isolated features. The archaeological features were generally shallow, contained few artefacts, and showed signs of being denuded from long term ploughing. The programme of archaeological assessment has not revealed any remains of such significance that they would provide an over-riding constraint on the proposed development of this site as a solar farm. Most of the buried remains identified are typical of a chalk downland landscape and are not of high significance. The below ground impacts of the proposed development of the site as a solar farm could therefore be mitigated by a suitable programme of archaeological work. The applicant also notes in their Planning, Design and Access Statement (Para. 8.69) that the proposed development will remove the site from arable use thereby reducing the impacts on buried remains from arable cultivation and the effects of modern ploughing and this is acknowledged. However, there are two monuments that are of sufficiently higher significance that they would merit removal from the scheme to ensure their preservation.

1. The well-formed, near-square, enclosure in Trenches 10, 11, 63 and 69, included a pit containing the majority of the prehistoric pottery recovered from the evaluation. This is the most pronounced and best-preserved feature identified during the evaluation and seems to date to the Late Bronze Age (1,000 – 800 BC). Its purpose remains unclear, perhaps more likely a stock enclosure, but possibly a funerary barrow or mortuary enclosure.

2. The site access from Wellhouse Farm to the proposed site crosses the site of two ring ditches (heritage asset 19 in the desk-based assessment report, see Fig. 3). These almost certainly indicate the presence of the buried remains of two Bronze Age funerary round barrows.

Modest redesign of the proposals should take both of these monuments outside of the proposed development, including any cabling or other works, thereby ensuring their preservation. This would meet the applicant's stated aim at pre-application stage '…to identify areas where significant buried archaeological remains may be located. The clear preference will be to avoid direct impacts wherever possible by avoiding development on these areas'.

1. As regards the near-square enclosure, this sits astride an existing hedge line with vehicular access provided on either side, leaving only a small portion of this enclosure within the footprint of the solar array. There would therefore need only be a very modest reduction in the footprint of the solar array to exclude all of the enclosure from the proposed development area, as has been taken into account for the tree root protection zone of the mature tree on the hedge line a little to the south.

2. As regards the possible Bronze Age round barrows, the line of the access road should be revised to avoid impacting on these features. The 'Planning, Design and Access Statement' does suggest (Para. 8.69) that the depth of the strip for the construction of the access track would be limited but it would still be preferable to modestly realign the access track to avoid any impact altogether. If these revisions to the overall design can be made, I would be satisfied that all other archaeological impacts could be mitigated by a suitable programme of archaeological work, should this application be permitted. This can be secured by a suitably worded condition and the following is recommended:

No development shall commence within the area indicated by the red line boundary on Low Carbon's Site Location Plan, Drawing No. SP-01, Revision 03, dated 13 November 2023, until a written scheme of investigation for a programme of archaeological work has been submitted to and approved in writing by the Local Planning Authority.

a) The programme of work will include on site investigation in areas of archaeological interest and in areas of the most significant ground disturbance from the development,

b) and a programme of post-investigation assessment, analysis, reporting, publication and archiving commensurate with the significance of the archaeological results. This part of the condition shall not be discharged until these elements of the programme have been fulfilled in accordance with the approved details.

REASON: In order to record and advance understanding of the significance of any heritage assets to be lost in a manner proportionate to their importance and to make this evidence and any archive generated publicly accessible in accordance with Paragraph 211 of the NPPF.

The programme of archaeological work is likely to include the archaeological investigation of areas of archaeological interest that might be particularly susceptible to the impacts of the proposed development, such as the possible Middle Bronze Age (1,500 – 1,100 BC) post-hole structure in Trench 22 and the other square enclosure in Trench 68, alongside archaeological monitoring and recording of other elements of the development, such as the stripping of the access tracks and the site of the inverters and substation. The Archaeology Service should be reconsulted once a revised development layout has been put forward, excluding the Late Bronze Age square enclosure and two ring ditches/barrows from the development.

Second response: No objection subject to conditions with the following comments received –

Thank you for informing Wiltshire Council's Archaeology Service of the submission of a 'Written Scheme of Investigation for an Archaeological Excavation' (Cotswold Archaeology, dated 26 March 2024), which sets out a programme of archaeological work to mitigate the impacts of the proposed development. Further to my comments of 21 January 2024, I can update my advice as follows. I have reviewed the WSI and sought some revisions to it, which Cotswold Archaeology have now made to the submitted document. The revised document (dated 26 March 2024) is now acceptable. Cotswold Archaeology has therefore submitted a further revised version of the document to me, and I have submitted this to you under separate cover. You will note that Paragraph 4.2 of the document states: 'It is assumed for the purposes of this document that access tracks and the construction compound will be built up and will not involve any below ground impacts. However, it will be incumbent on the solar farm's design/construction team to provide evidence to the Planning Officer and WC's Archaeological Advisor well in advance of any proposed construction timetable, of the design and form of the no impact access road construction (and compound), to be approved or otherwise by the Archaeological Advisor to WC. If the construction design to be implemented fails to satisfy the Archaeological Advisor of its no impact approach, this WSI will need to be updated/amended by way of an Addendum and new mitigation measures outlined for planning, to be approved by the archaeological advisor for Wiltshire Council.' It may therefore be appropriate that construction details of the access track and construction compound are secured by a suitably worded condition. Further to my advice of 21 January 2024, I therefore recommend two conditions as follows:

Condition 1 - The proposed development shall only be undertaken in accordance with the 'Written Scheme of Investigation for an Archaeological Excavation' prepared by Cotswold

Archaeology, dated 26 March 2024, reference AN0851, unless otherwise agreed in writing with the Local Planning Authority.

Condition 2 - No development shall commence within the area indicated by the red line boundary on Low Carbon's Site Location Plan, Drawing No. SP-01, Revision 03, dated 13 November 2023, until the construction details of the access track and construction compound have been submitted to and approved in writing by the Local Planning Authority.

REASON: In order to record and advance understanding of the significance of any heritage assets to be lost in a manner proportionate to their importance and to make this evidence and any archive generated publicly accessible in accordance with Paragraph 211 of the NPPF.

WC Landscape – Comments received stating:

The LVA concludes there is no real impacts on the setting or views from within the AONB/NL and minimal effects to the wider SLA. Landscape and visual effects are very localised and I think they can be mitigated successfully so I will not be objecting to the proposals. The planning application is accompanied by a Landscape and Visual Appraisal. It has been prepared by qualified landscape architects and follows current best practice and published guidelines. It is appropriate and proportionate to the scale of the development. The LVA rightly assesses that the impacts to the fabric of the site and its inherent landscape character will experience harmful effects through the change of use from an agricultural field to a solar array. This harm is technically temporary and reversible if , at end of life, the solar farm is fully decommissioned. The landscape mitigation strategy will introduce new elements of planting which will provide positive outcomes through the enhancement of landscape character and biodiversity beyond the lifespan of the array. The ZTV illustrates that the site has a relatively low visibility in the wider landscape. As described in the LVA the site is visually contained by topography (Homington Down) to the south and south west preventing views from the AONB/NL. The tree belt along Salisbury Road screens views from the northern boundary. The openness of the site extends views eastward towards Harnham from where views of Bake Farm solar array are possible. However, the planting of a new hedgerow with trees along the north eastern boundary of the site will considerably filter views once established with a moderate/minor adverse level of residual effect. The local footpath BRIT13 that crosses the site will be contained within a green corridor between the existing and a newly planted hedge which will reduce the developments visibility with a moderate/minor adverse level of residual effect.

WC Highways – No objection subject to conditions with comments stating:

The site is bounded to the north by the A354 Salisbury Road with access to be provided from existing vehicular accesses served by Homington Road to the east of the site. This section of Homington Road is relatively straight with good forward visibility. The road is generally of adequate width for two cars to pass but the larger construction and delivery type vehicles may create some issues. There are very few passing places and there is a concern that vehicles will over-run the highway verges and damage the surface. A full photographic survey is therefore required prior to commencement clearly showing the edges of road and verges on both sides from the junction, and including the junction, with the A354 to the site entrances. This should be submitted to the Local Highway Authority together with a commitment to repair and make-good any damage identified to the road and/or verges for the duration of the construction period. The submission of a Construction Management Statement is also necessary prior to commencement, which should include details of how access will be maintained and managed for existing users of Homington Road during construction having regard to the restricted width and limited passing opportunities. The operational access will

be provided by an existing agricultural field access around 600m to the south of the construction access. The local highway network is adequate to accommodate the infrequent vehicle trips associated with the operation of the site. Some improvements will be made to the access to achieve appropriate sight lines and the gates should be setback to allow vehicles to pull off the highway for the gates to be opened. The Rights of Way Officer should be consulted for a view on the impact of the PROWs identified as BRIT12 & BRIT13.

WC PROW – No objection with comments received stating:

As Sailsbury expands it will increase usage of the Public Rights of Way Network and the pressure on the existing Rights of way as more get subsumed into the developed area. For this reason, I would request that the applicant dedicates a new Bridleway starting opposite BRIT14 and linking to BRIT13 this will improve the Public Right of Way network by linking two Public Rights of Way. The whole length of BRIT13 should be dedicated as a bridleway with a width of 4 meters. I note that whilst the solar farm is now smaller in size it was previously going to include land further to the West which would have come close to Public Footpath CBIS4 It would be a nice benefit to the public if a new Bridleway could also be dedicated from opposite BRIT14 to proceed west to meet up with CBIS4 and for this route to have a dedicated width of 4 meters. All ditches will need to be culverted with a usable width of 4 meters to make manoeuvring over them as easy as possible for any equestrian users. The development is likely to have a life of 40 years I would also request that £40,000 is provided as a section 106 agreement for the Countryside Access officers to spend on Improvements to the Public Rights of Way network within 5km of the site. This money should be index linked and paid prior to commencement of the development. The addition of the Bridleways and upgrade of BRIT13 to Bridleway within the site would help to improve future connectivity of the Public Rights of Way network especial given that just over 1,000 meters North of the site is a large residential estate currently in build.

WC Ecology – No objections subject to conditions – comments detailed in full within the report

WC Drainage – No objections subject to conditions

WC Public Protection – No objection with comments received stating:

I have considered the Noise Impact Assessment and Glint and Glare report in regard to residential receivers. There are no adverse comments to make regarding these reports.

WC Conservation – No comment to the proposal with the following comments provided:

I do not consider that the proposals will have an impact on the setting of any heritage assets and as such, have no comment to make.

WC Tree Officer – No objection subject to a condition imposed around works being carried out in accordance with the submitted arboricultural reports.

Historic England – No comment but suggest you seek the views of the Council's Conservation and Archaeology Teams

Natural England – No objection subject to conditions

AONB/NL Partnership – Objection with comments received stating:

The proposal appears to be for a permanent permission covering some 40ha of arable land to install solar panels with a height of 3m to create a solar farm generating around 49MW of

electricity with associated sub-station, inverter, and control 'cabins' together with security fencing and pole mounted CCTV cameras. In simple terms, the application is to convert, permanently, grade 3a farmland to industrial, power station, use in the setting of this National Landscape. However, the proposal does not appear to include the connection to the electricity grid, and the 'Point of Connection' is shown as being on the western side of Homerton in this National Landscape and involving crossing the River Ebble. That crossing would either risk significant visual intrusion to the river valley by overhead cables or disturbance to the river and associated wetlands by an underground route. I hope you are aware of the recent changes to the duty of regard, s.85 CRoW Act 2000, brought about by the s.245 of LURA 2023. The effect, in England, is that relevant authorities – including Wiltshire Council – when carrying out any of their functions that affect land within a National Park, the Broads, or an Area of Outstanding Natural Beauty 'must seek to further the purposes of designation'. The purposes of designation are conserving and enhancing natural beauty, and the inclusion of 'affect land within' includes activities in the setting of the designated area. That means the amended duty applies to the consideration of the current application. I may have mentioned previously that in connection with solar farm developments this NL / AONB team has observed that in practice the glare from field scale PV panels is obvious in the landscape over much greater distances than the applicants / developers assert. For example, the Canada Farm development west of Blandford appears as a light glassy intrusion in the verdant hillside from the road and area around Badbury Rings some 11 km to the south east. In relation to the current application, which is on land that faces southwards to this AONB, a number of roads and public rights of way direct views towards the site. I have, therefore, looked with particular interest at the Glint and Glare Study and the LVA submitted with the application. As I am confident you will be aware, in addition to the very different appearance of frame mounted solar panels from the front and rear [although both are particularly industrial], the inverter and sub-station 'cabins' are rigid rectilinear structures that do not sit well in the rural scene. Fundamentally, solar farms do not conserve and enhance natural beauty, as identified in our adopted Management Plan [Wiltshire's policies for this designated area] and Position Statements. NPPF [Dec 2023] 183 is clear that major development should be refused in a NP, the Broads, or AONB other than both in exceptional circumstances and where the development in in the public interest. Although the proposed development is just outside this NL / AONB, the revised s.85 duty means the LPA has to actively seek to conserve and enhance natural beauty and, therefore, allowing harm to the NL / AONB would be contrary to that revised statutory duty. The Glint and Glare Study by Pager Power claims to assess the effects in relation to aircraft and airfields, roads, and domestic properties. However, the consideration of residential properties does not include dwellings on the rising and higher ground in this NL / AONB, or the glare that would be experienced by users of the PRoWs, tracks, and roads within this NL /AONB which direct users' views towards the site when travelling northwards. Views of the rear of the panels are considered in relation to traffic on the A354 between Coombe Bissett and Salisbury, and aerial and ground level photographs are provided, Fig 17 – Fig 24. However, the dual carriageway shown in Fig 18 does not exist on that section of the A354, I have not seen the wide junction with a traffic island shown in Fig 22, the wide verges shown in Fig 21 do not exist near Coombe Bissett, and the views in Fig 20 and Fig 19 do not show the mature Beech trees that exist on both sides of the A354. Clearly if assessments have been made using these inaccurate photographs they cannot be regarded as competent or valid. Moreover, the fact that wrong photographs have been used, and not identified when the report was internally reviewed, means no confidence can be had in that report as a whole. As mentioned above, and contrary to assertions from the industry, solar farms do appear as an extensive light glassy glare that is an alien intrusion into the rural scene. That would be an adverse impact on this nationally designated area. Doubtless you will have noticed that despite being advised to provide an LVIA with the application, the applicant has submitted an LVA. There is, therefore, little focus on the impacts of the proposal. The assessments have been in spring and summer when the trees and hedges are in full leaf, thereby providing maximum screening. That is, of course, not the 'worst case scenario' of winter time by which the visibility of potential development should be judged. Furthermore, the consultants consider a 15 year time frame for mitigation to be

achieved, which is not avoiding or minimising the adverse impacts as required by NPPF [Dec 2023] 182. The area of search for the LVA seems somewhat conspicuously not to include the Open Access Land, PRoWs and tracks on the slopes of this NL facing northwards towards the site and in the 1-2km range from it. Users of those PRoWs and tracks [unclassified and D class roads] would be facing towards the site for considerable lengths of their journey. Open Access areas are, as described, open areas that often provide extensive views of the surrounding countryside. It is also noticeable that many of the plans terminate just south of the road between Coombe Bissett and Homerton, thereby excluding that rising ground, PRoWs and tracks within this NL. It seems highly likely that large parts of the proposed development will be clearly visible in those views from this NL. Indeed, photos from vps 6 and 7 show the significantly smaller Bake Farm installation clearly, and demonstrating the unnatural glare from the surfaces that attractions attention to the development. Whilst the consultants have considered a couple of viewpoints much further away in this NL, those locations are back from the brow of a hill whence more revealing views would be gained or behind existing woodland. The selection of those points does not facilitate the consideration of the 'worst case scenario' and could be interpreted as seeking to minimise the extent of impacts on this NL. The photographs also appear to rely upon hedges or trees being in leaf to screen the site, and there is no indication that the applicant has any influence over the long term maintenance or existence of off-site planting. The appropriate taking of a tree crop or windthrow of an overmature tree belt would expose the proposed development. That could, for example, apply to the mature tree belt in vp 8 photograph. It also appears that the location and extent of the proposed development is incorrectly indicated on that photograph. The A354 coming out of Salisbury is recognised as the entry route to this NL; and that was emphasised in a number of the comments made at the pre-application exhibition in Coombe Bissett village hall. It is, therefore, disappointing that the LVA does not include the appearance of the proposed solar farm from that route. It is particularly disappointing as that was also a consideration when the Bake Farm development was proposed, and the extent of that development was modified and withdrawn from the field adjoining the road to facilitate an approval. The Beech trees beside the A354 are noted in plan annotations as providing screening of the proposed development from the north. However, there is no evidence that those trees are in the control of the applicant and could, therefore, be managed as a permanent screen in the long term. Recent history indicates that those trees are reaching a stage where they may need management work or replacement. It seems unwise to rely on screening that cannot be guaranteed by the applicant. As you are aware, the PPG emphasises views to and from AONBs when considering the impacts of development in the setting of AONBs [NLs]. The LVA is, therefore, not correct in its conclusions, paras 7.44 – 7.51 that there would be no effects on this AONB / NL. It is especially worrying that such a sweeping conclusion has been drawn when extensive and significant areas of this NL in the southern arc from the site have not been evaluated. Vp 4 is one of the closest to the site and the LVA assessment seems to understate the scale of impact. The green fields would be completely changed to an industrial power station, so it seems more than an understatement to suggest that the magnitude of change would be medium and impact would be very low or negligible. This seems typical of the LVA which seems to downplay impacts by at least one category. Furthermore, as I have already indicated, it is not appropriate to have to wait 15 years for the mitigation of a development in the setting of a NL / AONB to achieve the necessary screening. I disagree with paras 7.44, 7.45, and 7.46. There is intervisibility between the AONB / NL and the site but the applicant team have not investigated important and extensive areas of this nationally protected area. Because there is no evidence of those areas being assessed the statements in 7.45 are just assertions. Similarly, and taking guidance from NPPF [Dec 2023] 182 and PPG 042 [Natural Environment], a major development of the scale and nature proposed would impact adversely on this AONB / NL. To clarify and correct 7.47, the setting of the nationally important and nationally designated AONB / NL is protected by NPPF 182 and PPG 042, the SLA is a local designation of landscapes of local importance. The conclusions significantly understate the impacts on the AONB / NL, and, despite being highlighted in pre-application advice, there is no cumulative assessment considering other

developments, including Bake Farm. As can be easily noticed in the photos of vps 6 and 7, there would be cumulative impacts, not just with the physical development of a greenfield site but also the almost continuous glare from two solar farms creating a distracting and discordant visual intrusion over an extended area. There are statements in the submitted documents about the reversibility of the proposals, but as the application is for a permanent development that reversibility is not a material issue. Furthermore, there is a fundamental misunderstanding about the AONB Position Statements in that they are not superseded by the Management Plan, but they supplement the Management Plan and are endorsed by our Board of Partners. It is, therefore, wrong for the applicant team not to take heed of our Position Statements, particularly in relation to Renewable Energy and Field Scale Photovoltaic Panels. Landscapes and Planning Publications - Cranborne Chase National Landscape Whilst there might be a case for a smaller proposal in the southern part of the current site, that would need to be accompanied by assessments of views from this NL / AONB including sections to demonstrate that the topography and not vegetation screens that reduced site from views out from this NL / AONB. The connection to the grid would need to be considered at the same time as that could have negative impacts which could influence the overall acceptability of a proposal. Nevertheless, for the reasons set out above, this NL Partnership cannot support the current application. It is mindful that the application does not comply with AONB Management Plan policy PT16 as it does not integrate with landscape character, there is not the evidence to demonstrate that it would not be visually intrusive to the setting of the AONB / NL or impair views from it, and it does not appear to be appropriate in scale bearing in mind the likely cumulative impacts. The Partnership therefore objects to the application as submitted.

UPDATE:

I read from the revision table at the start of the document that a number of the photographs have been corrected. However, if the assessments were based on the previous photographs how can anyone have confidence the unchanged assessments are even vaguely accurate? I also note that in 6.3.2 Table 4 the assessment of screening of glare and glint from the A354 by intervening vegetation is only desk-based. That seems a rather relaxed way of determining a key parameter as being 'No Impact'. Furthermore, that approach does not even appear to take the winter-time, no leaves on the trees, situation as the worst case baseline which is, as you know, the accepted approach to landscape and visual impact assessment. The report commits quite a lot of space to aerial impacts of glare and glint, and the location of airfields, whilst giving prominence, page 65, to the fact that there is a national statement that there is no evidence that glare or glint interfere in any way with aviation navigation or pilot and aircraft visibility or safety. The purpose of such effort seems strange when 'Therefore, the Secretary of State is unlikely to have to give any weight to claims of aviation interference as a result of glint and glare from solar farms.' The ground based assessment area shown in Fig 5 extends to only 1km from the site and, again, the assessment of glare and glint impacts on residences is only desk-based without any empirical evidence of the screening effect of vegetation or the season of the year when screening could be effective. It seems overly enthusiastic to suggest there would be 'No Impact' on the residences with that lack of definitive evidence. The commissioners and authors of the report appear oblivious of the potential impacts of glare and glint on this nationally designated National Landscape, its purposes of designation, and the sensitivity of those who use the PRoWs and unclassified tracks / roads with a reasonable expectation of not encountering either industrial scale energy generation or the side effects of that. There is no further assessment of the glare or glint impacts beyond the airfield, A354 road, and residences with 1km. That is a significant gap as this NL team can point to the unusual appearance of the Canada Farm solar farm in Dorset appearing as a glassy and alien feature in an otherwise verdant landscape from 11km distance on the B3082 near Badbury Rings. Both the visibility and glare / glint issues do need to evaluated from more than 1km from the site and in the context of one of the nation's most sensitive landscapes. It is also relevant to consider the application of s.85(A1) of CRoW Act to the applicant as a generator / supplier of electricity. The applicant should be seeking to further the purposes of NL / AONB

and the various reports studiously avoiding the location of the NL / AONB and the potential impacts of the proposed development on the NL / AONB indicate that s.85(A1) is not being complied with. In conclusion, the amended Glare and Glint Report does not cause or enable the Cranborne Chase National Landscape Partnership to change its stance on the application; it cannot support it.

8. Publicity

The application has been advertised by way of letters to near neighbours of the site, press notices and site notices. The publicity has generated 67 letters of objection and 3 letters of support. Representations (objections) have also been made by CPRE.

Objections summarised as the following:

- Impact on the Special Landscape Area;
- No battery storage facility is proposed;
- No point of connection that will require a further planning application;
- No consideration of alternative sites;
- No connection to the National Grid;
- Flood risk to surrounding areas;
- Ecological Impacts/loss of wildlife habitat;
- Precedent for future development;
- Loss of agricultural land;
- Solar Farms are highly inefficient;
- Proposed would have an urbanising effect on the landscape;
- Outdated solar equipment proposed;
- Overload of un-necessary information accompanying this submission;
- Lack of an Environmental Impact Assessment (EIA);
- View of proposed site will be far greater to that of Bake Farm Solar Park;
- Wiltshire Council's solar uptake exceeds that of other counties;

Letters of support summarised as follows:

- The Solar Farm will help Wiltshire Council and the UK meet renewable energy and carbon targets;
- The Solar Farm is completely reversible at the end of its life;
- Increase wildlife habitats and biodiversity;
- The site can be used for traditional meadow management designed to benefit both food production and biodiversity

CPRE representation as follows:

Objection with comments received stating:

On behalf of the CPRE South Wiltshire group I object to this application.

The installation would comprise the following (Design & Access statement):
Rows of solar photovoltaic ('PV') panels;
Inverters within shipping containers (or similar);
O&M building;
Spare parts container;
Cabling and substations;

Internal access tracks;
Perimeter fence and internal fencing; and
CCTV cameras.

It would obliterate a very large area of beautiful countryside with highly visible industrial panels and ancillary equipment; render a large area of the Best and Most Versatile agricultural land unusable for agriculture; have a damaging effect on the Cranbourne Chase National Landscape (AONB); and be contrary to Wiltshire Council's policies as in its adopted Local Plan (2015).

CPRE stance

CPRE supports renewable energy solar installations in principle but contends these must be on rooftops or on brownfield/industrial land, not greenfield sites. We estimate there is enough appropriate commercial roof space for solar panels to meet half the UK's electricity demand (CPRE's Position on Solar Energy 2022. This would avoid loss of agricultural land and wildlife habitat due to large industrial installations such as Beech Tree Farm. We agree a balance must be struck but we contend that in this case the creation of the solar farm proposed is disproportionately harmful to the loss of quality agricultural land and the intrusion into a sensitive landscape industrialising its character near a dense centre of population.

Agricultural land

This large photovoltaic array would occupy 40.4 ha of Grade 3a (49%) and 3b (51%) agricultural land. Grade 3a is a "best and most versatile agricultural land" classification. The application acknowledges that the grades are distributed unevenly and it would be difficult to separate the use.

The NPPF (para. 180) is clear that planning decisions should contribute to and enhance the natural and local environment by recognising the economic and other benefits of the best and most versatile agricultural land. Footnote 62 states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. There is no indication in this application that the use of an area of poorer quality land has been considered.

Landscape

The government itself points to the adverse impact that large scale solar farms can have on landscape and that proposals in areas close to Areas of Outstanding Natural Beauty need careful consideration. [Gov Guidance Renewable and low carbon energy Paragraph: 007 Reference ID: 5-007-20140306]. The application is not consistent with Wiltshire County Local Plan (Adopted 2015). In Core Policy 51: Landscape the very first sentence reads: Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character…. The policy also says: Proposals for development outside of a National Landscape (AONB) that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting (my bold text). This policy reflects the NPPF (2023) paras. 180-183. The Local Plan says, further, 'Development within the Community Area [of South Wiltshire] will need to conserve the designated landscape of the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty and its setting, and where possible enhance its locally distinctive characteristics' [para 5.126]. Core Policy 42 deals specifically with standalone renewable energy installations. Proposals will be supported subject to satisfactory resolution of all site specific constraints including the landscape, particularly in and around AONBs, and Best and most versatile agricultural land. These constraints have not been resolved for this application;

therefore it should be refused. Wiltshire Council is party to the management plan for the National Landscape (AONB) and therefore is not able to approve this application. This large pv array is close to the National Landscape (AONB) and would adversely affect its setting. Viewers looking from the array into the National Landscape (AONB) would be affected by awareness of this large industrial site. Indeed from the public right of way through the centre of the site they would be pushed to see countryside at all through the array of 3m high panels. Looking from the National Landscape (AONB) the large array, cabins and fencing would be highly visible. For these reasons CPRE South Wiltshire Group objects to this application and requests that it be refused.

9. Planning Considerations

9.1 Principle of development including the 'Rochdale Envelope Principle'

The NPPF advocates the primacy of the development plan and, first and foremost, decisions must be made in accordance with the development plan, unless material considerations indicate otherwise (Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004). Any conflict identified with development plan policy must be attributed the appropriate weight in consideration of the planning balance.

Turning to the development plan (the WCS), the site lies within countryside and Core Policy 42 of the strategy supports the development of 'standalone renewable energy installations', subject to the identified criteria. In particular, proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account:

I. The landscape, particularly in and around AONBs
II. The Western Wiltshire Green Belt
III. The New Forest National Park
IV. Biodiversity
V. The historic environment including the Stonehenge and Avebury World Heritage Site and its setting Use of the local transport network
VI. Residential amenity, including noise, odour, visual amenity and safety
VII. Best and most versatile agricultural land

Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context.

The site does not lie within a National Landscape (formerly known as the AONB) but is within the setting of the Cranborne Chase National Landscape (CCNL). The application is accompanied by a Landscape and Visual Assessment that has assessed the impact of the proposed on the setting of the CCNL (former AONB). As such it is considered that points i. iv, v, vi, vii and viii should carry the greater consideration and will be covered within this report. The principle of standalone renewable energy is accepted provided the relevant criteria are met.

The provision of standalone renewable energy installations is supported in the NPPF. Paragraph 157 of the NPPF states that the planning system should support the transition to a low carbon future in a changing climate. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience and support renewable and low carbon energy and associated infrastructure.

Locally, Wiltshire Council has made a firm commitment to becoming a carbon neutral council by 2030 and the Council's adopted ECO (Energy, Change and Opportunity) Strategy sets out a clear commitment to increase the uptake of renewable energy. Action to tackle climate change through energy efficiency and renewable energy generation are intrinsic to how Wiltshire Council wants to develop, as is set out in the Council's Climate Strategy Delivery Plan 2022-2024.

Paragraph 163 of the NPPF states, 'When determining planning applications for renewable and low carbon development, local planning authorities should:

- *Not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and*
- *Approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas'.*

The Government's Planning Practice Guidance (PPG) states:

'Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable' Paragraph: 001 Reference ID: 5-001-20140306'.

Accordingly, it is clear that the principle of renewable and low carbon energy development is supported in principle by the Government at national level and at a local level by the relevant Core Policy (CP42) of the Wiltshire Core Strategy.

Rochdale Envelope Principle –

The Committee's attention is drawn to the 'Rochdale Envelope Principle'. This principle, which is accepted in planning case law, allows for design flexibility through the assessment of maximum design parameters and worst-case environmental impacts in the early design phase, and so ensures that development maximises efficiency at the detailed design stage.

The 'Rochdale Envelope' is proposed with this application. All environmental impacts by way of the proposal have been assessed adopting the principles of the Rochdale Envelope. This approach involves assessing the maximum (and where relevant, minimum) parameters for the elements where flexibility is required, in order to assess a worst case scenario. For example, the solar panels have been assessed for the purposes of landscape and visual impact as being a maximum of 3-4 m in height (above ground level), with the upper figure used in areas at highest risk of flooding; however it is actually possible that the majority of panels could be lower.

As a general design principle for the ground mounted solar, the layout would be based on bifacial panels fixed onto a fixed mounting system, running east to west and orientated to the south. Bifacial panels are photovoltaic cells that can produce electrical energy when illuminated on either side of the surface. This approach also involves defining development zones (see submitted plan DWG No: DZ-01 Rev 06), rather than having a defined layout, which represents one way in which the site may be developed and sets the parameters for where

the infrastructure may be located on site. This would then allow any contractor opportunity to optimise the layout of the site rather than be bound to a precise layout.

The Rochdale Envelope approach is supported within National Policy Statements (NPS), specifically in Overarching NPS for Energy EN-1, January 2024, paragraphs 4.2.11 and 4.2.12; and the NPS for Renewable Energy Infrastructure EN-3 January 2024, paragraphs 3.6.1 and 3.6.2. The NPS are a material consideration to be taken in account in the determination of this application.

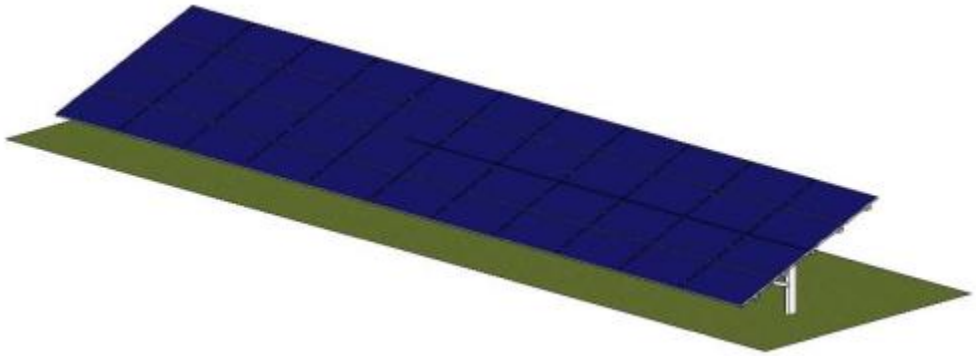
An example (not in Wiltshire) of an appeal case where this approach (the Rochdale Envelope) has been accepted is Land west of Thaxted, Cutlers Green Lane, Thaxted (APP/C1570/W/23/3319421) (allowed Dec 2023) – The Inspector was satisfied with the Rochdale Envelope approach noting:

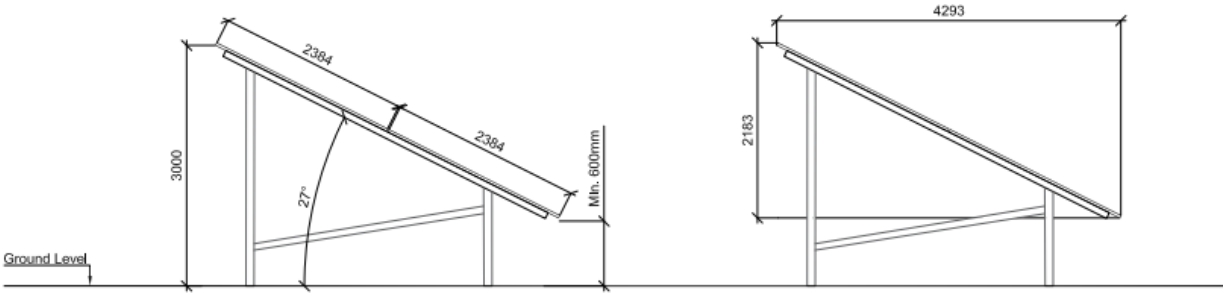
An indicative site layout has been submitted within the Development Zones, but these could be subject to change at the detailed design stage. The approach allows some flexibility in the final design and siting of elements of the development. This is a reasonable approach in light of the evolving technology involved and that a contractor has not yet been appointed for the development.' Appeal decision para. 11 -

A copy of this appeal decision is included within this report as an annex. On the basis of the above in the context of this proposal, noting the recent appeal decision on the Rochdale Envelope approach and the principle acceptability of this proposal in local and national planning policies, officers recommend to members that this approach is acceptable.

As previously alluded to, the submission of this application does not provide all of the design details of the proposed development as a final investment decision will need to be undertaken by the applicant should members be minded to approve. In the absence of this, the application seeks to incorporate sufficient design flexibility in terms of the dimensions and layout of the structures that include the precise layout of the site and height of the solar panels.

The solar PV panels would be laid out in rows running from east to west across the site with an approximate gap of 3-4 metres within each row. The panels would be mounted on a frame and installed using spiked foundations approximately 1-2 metres deep. An example of a row of solar panels is shown below along with drawing DWG No: SD-39.4 that shows the height of the solar panel array to be 3 metres.





The proposal would involve a number of inverters and transformers within containerised units similar to shipping containers that would measure approximately 12.2 m long by 2.5 m wide by 2.9 metres high, each sited upon a concrete base. The details of this are shown on plan DWG No: SD-08 Rev 02. A 'customer' substation is also proposed and would measure approximately 10 metres long by 4 metres wide by 3 metres high and a DNO substation is also proposed that would measure approximately 8 metres long by 5.4 metres wide by 4.1 metres high and would both be sited on concrete bases. Drawing references DWG No: SD-14 and SD-15 show these details.

There are a number of ancillary buildings also proposed to be sited within the site that form associated infrastructure for operation and maintenance of the solar farm. These include an O&M Building and Spare Parts container with both containers measuring approximately 6.7 metres long by 3.1 metres wide by 2.9 metres high and would be sited on concrete bases. Drawing references DWG No: SD-33 and SD-36 show these details.

In terms of security of the site, deer fencing (mesh with wooden posts or similar) to an approximate height of 2 metres is proposed to surround the outer edges of the site with wooden supporting posts approximately 3.5 metres apart. The fencing would be sited inside the outermost hedges/trees/vegetation ensuring the fencing is visibly obscured with access for maintenance. Gates would be installed at the access point for maintenance purposes. The perimeter of the site would be protected by a system of CCTV cameras, sited on poles of up to 3 metres in height at spaced intervals.

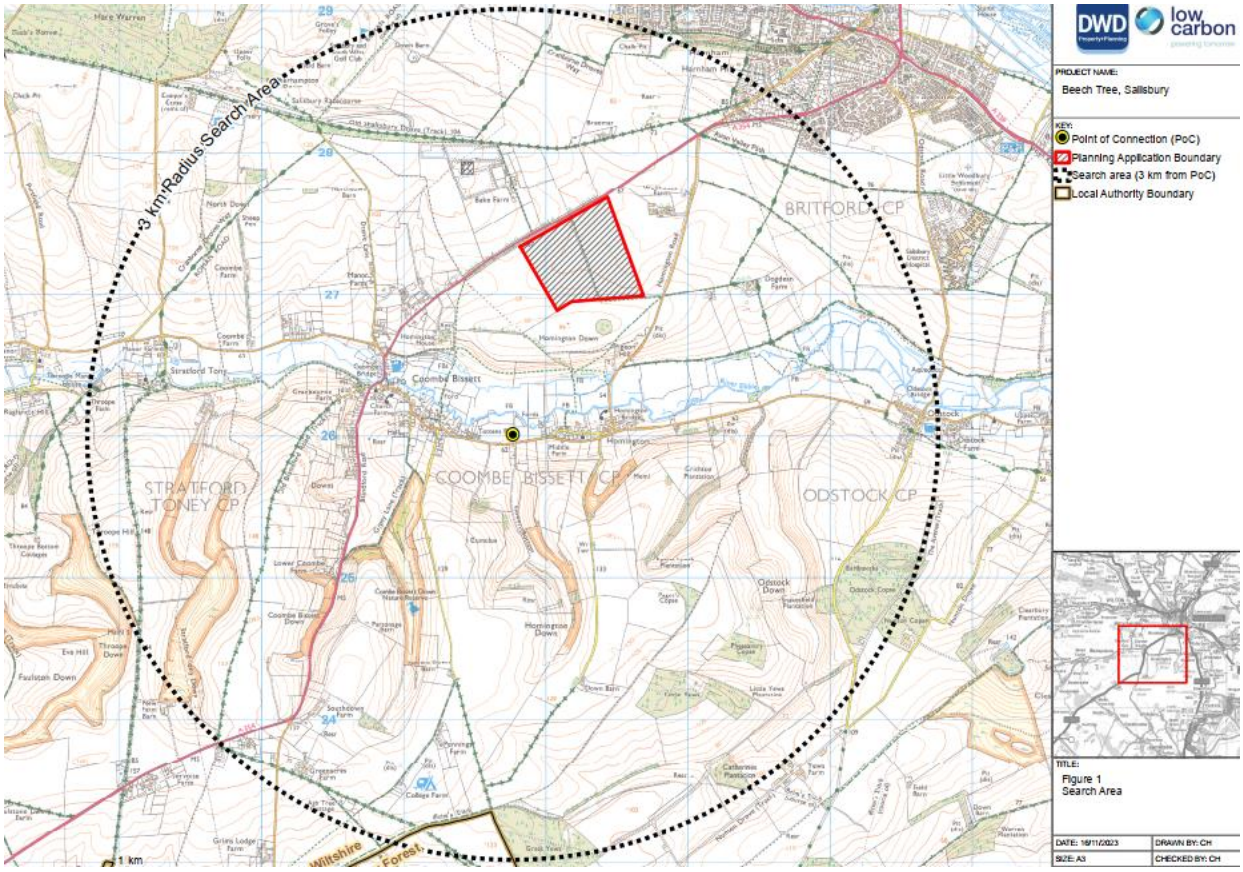
9.2 Decommissioning and restoration of site

At the end of the lifespan of the proposed development, all equipment including the solar panels and associated infrastructure equipment are to be removed and the site is to be restored to its former condition. As most of the land is to be retained as grassland, the restoration of the land would be more favourable in comparison to more intrusive development such as large buildings requiring significant foundations.

The restoration process to ensure the land is restored to the same quality as previously can be secured via an appropriately worded condition associated with any planning permission.

9.3 Site selection and the loss of best and most versatile agricultural land

The application is accompanied by an Agricultural Land Classification (ALC) report, prepared by an experienced soils expert. The application is also accompanied by an Alternative Site Assessment (ASA) report that has been undertaken by the applicant/agent in order to inform the viability of the site and availability of the grid connection. The search area was defined by a 3km radius from the point of connection (POC) which is considered suitable for a solar farm of this capacity and included an area covering parts of Wiltshire Council and New Forest District Council. This is shown in the map below.



The site comprises of a mix of 49% Grade 3a (Good Quality) and 51% Grade 3b (Moderate Quality) agricultural land. The search area comprised predominantly Grade 3, and to a lesser extent, Grade 2, Grade 3a and Grade 5 agricultural land and urban land. Due to the predominately rural nature of the search area, no alternative sites were identified during the previously developed land search and due to the majority of the search area comprising of Grade 3 agricultural land, two alternative sites to this site were identified. However, both have been discounted due mainly to unsuitable topography presenting a constraint to the installation of a solar farm and associated infrastructure.

Officers note the large volume of written representations raising concerns around the loss of best and most versatile agricultural land. A land classification map below taken from the submitted ASA shows the breakdown of the agricultural land grading.

WCS CP42 (viii) already sought to protect the *best and most versatile agricultural land* but the 15 May 2024 Written Ministerial Statement states that;

'As is outlined in the National Policy Statement, the starting position for solar PV developers in taking forward Nationally Significant Infrastructure Projects is that applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality'.

'This means that due weight needs to be given to the proposed use of best and most versatile land when considering whether planning consent should be granted for solar developments'.

It is important for members to note that this is restating existing land use policy which already acknowledges that weight should be given to using BMV agricultural land and the higher the land grade, the greater justification must be given.

As outlined in the ALC report, the majority of the site is not considered to be BMV. Natural England have also confirmed within their consultation response that the quantum of loss is below the 20ha threshold of permanent BMV loss and do not propose to make any comments on this matter.

The ASA also confirms that there is no previously developed or lower quality agricultural land available, and the two identified alternative sites were considered to be less preferable on balance due to topography constraints. The agent for this proposal has researched the DEFRA dataset and confirm that Wiltshire has 322,411 hectares of land. Of this 322,411 hectares, 277,278 hectares have been graded for agricultural quality grades 1, 2, 3, 4 and 5 with the rest classed as urban or non-agricultural. This is based on the DEFRA mapping which does not breakdown Grade 3 into 3a and 3b. Assuming that Grade 3 land is equally split into 3a and 3b this would mean Wiltshire has 148,289 hectares of Best and Most Versatile Land (total of Grade 1, Grade 2 and Grade 3a). The proposal involves the temporary use of 19.9 ha / 0.01% of Wiltshire's BMV land to power almost 4.5% of Wiltshire's homes.

The Council's own mapping system only details that the land is 'grade 3' and does not have the detail as to whether its 3a or 3b. DEFRA's 'magic maps' also does not map this specific site. Therefore, the applicant's submitted ASA statement is considered to be the only available

accurate assessment of the site's agricultural grading. On the basis of the submitted documentation, officers consider that the proposal has sought to minimise impacts on BMV land that will remain undisturbed for the temporary operational life of the development proposal.

9.4 Cumulative Impact of Solar Farms within Wiltshire and Landscape Impacts

It is acknowledged that this recommendation has come before Committee before the government has provided any further guidance following the WMS (and at the time of writing of this report the general election has just been decided with a new government elected). Therefore, Officers have provided their own analysis and consideration of cumulative impacts of solar farms in Wiltshire.

The WMS instructs Local Authorities to –

"*When considering whether planning consent should be granted for solar development it is important to consider not just the impacts of individual proposals, but also whether there are cumulative impacts where several proposals come forward in the same locality*."

And Wiltshire Council's motion raises concerns that –

"*Some villages are now completely surrounded by solar farms and their continued concentration represents a significant cumulative impact and industrialisation of the countryside. Wiltshire Council therefore calls on the Secretary of State for the Department of Levelling Up, Housing and Communities to define more closely what is meant by 'cumulative impact' regarding solar farms battery storage and associated infrastructure and to take clear steps to ensure that solar developments are more evenly spread across the UK and not concentrated in specific areas effectively industrialising the countryside*."

The WMS refers to *'cumulative impacts of several proposals on the same locality'* and although 'locality' is not defined, Officers interpret this to mean being in close proximity or the same 'neighbourhood' to each other rather than being 'county wide'. This is echoed by Wiltshire Council's motion as it specifically mentions and offers a definition of its own in that '*some villages are now completely surrounded by solar farms and their continued concentration represents a significant cumulative impact and industrialisation of the countryside'*. Officers interpret that this means that the existing solar farms have only industrialised those specific areas of open countryside rather than the overall open countryside of Wiltshire.

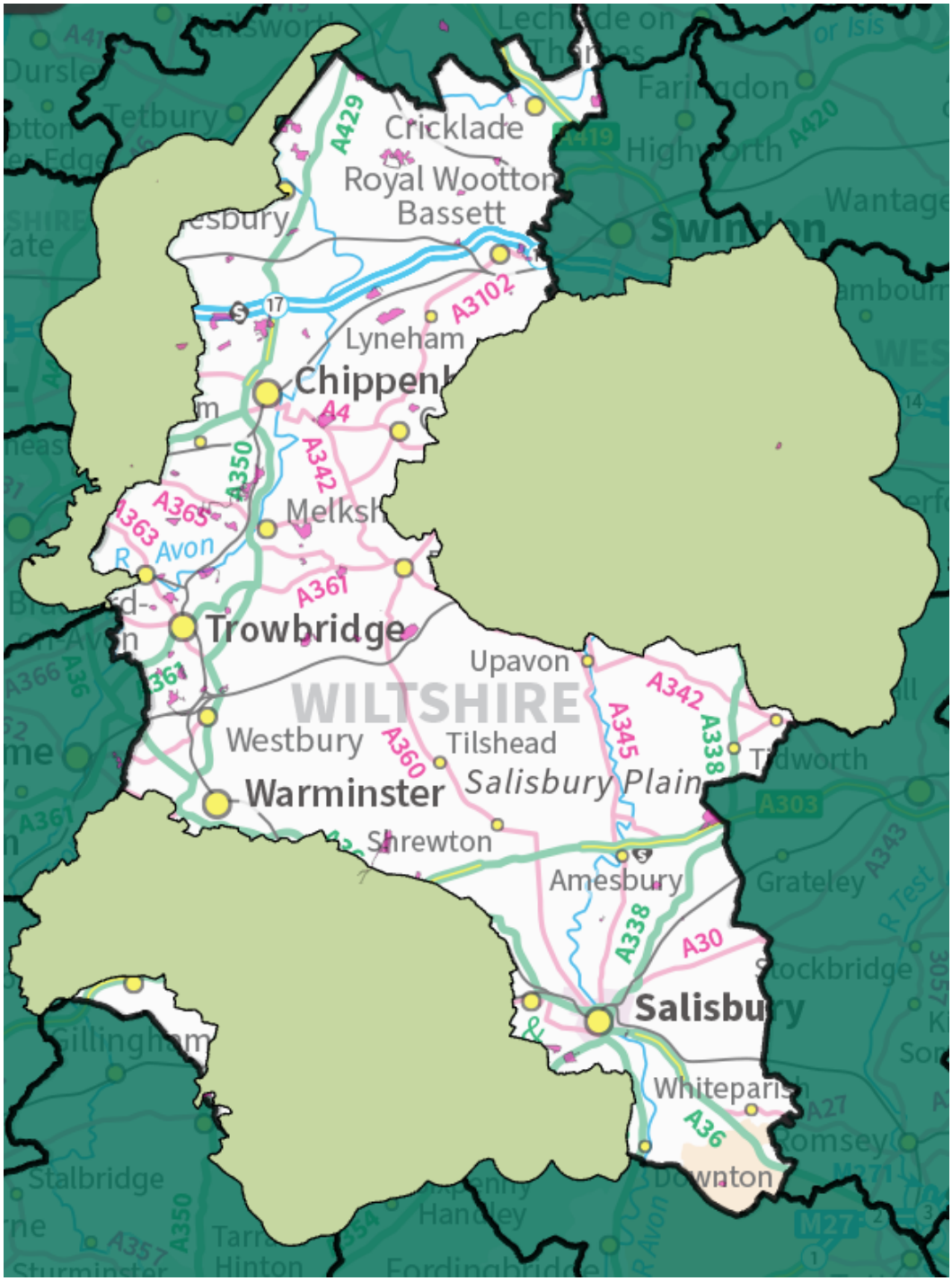
The image below shows the locations and extent of each planning application for solar farms in Wiltshire (in pink) but doesn't distinguish whether those applications were approved or refused. However, it is understood that there are '*more than 40 working solar farms'* in Wiltshire. In addition to this application there are two other live solar farm applications;

PL/2023/08481 - Land at Red Barn, East of Kington St Michael, Chippenham – 40MW
PL/2023/10332 - Land South of Potterne Park Farm, nr Potterne, Devizes – 49.9MW

Locations of all planning applications for Solar Parks in Wiltshire
(Pink infill with the application site and phases 1-3 in the red circle)

It is submitted that the majority of the solar parks are to the north and central western part of the County with very few sites in the east and in the south of the County. The application site is located within the red circle.

It is also submitted that one of the reasons as to why these locations within Wiltshire have been developed is due to the three National Landscape designations (Cotswolds, North Wessex Downs and Cranbourne Chase and West Wiltshire Downs), where the image below shows how they have effectively channelled the majority of existing solar parks into the space in-between. There have been limited numbers of permissions within the National Landscape Areas (given permission between 2012 and 2014).



Locations of all planning applications for Solar Parks in Wiltshire (Pink infill) with National Landscapes shown as light green

However, even with the National Landscape restrictions (and Salisbury Plain), the central south and south east part of the County has not had many applications for solar farms.

It is acknowledged that whilst the Council did require an Environmental Impact Assessment (EIA) for this application due to highway impacts (PL/2023/03063); this was only in the context of screening against the EIA regulations. The EIA regulations are not policy to be applied in relation to WCS core policies CP42 and CP51, or to the WMS and the Wiltshire Council motion.

It is submitted that that the southern part of Wiltshire has not seen 'several' applications in the 'locality' and that whilst this proposal would see the development of approximately 40 hectares of land in fairly close proximity to the Bake Farm Solar Farm development to the north of the site, it would not have any discernible or harmful cumulative impact on the open countryside. To further enforce this assertion, the application is accompanied by a Landscape Visual Assessment (LVA) Report and a Glint and Glare Report.

9.5 Landscape and visual impacts

The site lies within a Special Landscape Area as designated as policy C6 of the Saved Salisbury District Local Plan (SDLP). The site falls outside of the National Landscape Cranborne Chase (NLCC) (former AONB) but is approximately 0.8km from the boundary of the NLCC. Officers note the comments and concerns of the National Landscape received during the consultation phase of the planning application. These comments are detailed in full within the consultee response section of this report.

Saved policy C6 of the SDLP states:

"Within the Special Landscape Area, proposals for development in the countryside will be considered having particular regard to the high quality of the landscape. Where proposals which would not have an adverse effect on the quality of the landscape are acceptable, they will be subject to the following criteria:

(i) The siting and scale of development to be sympathetic with the landscape; and
(ii) High standards of landscaping and design, using materials which are appropriate to the locality and reflect the character of the area."

Core Policy 51 states that:

"*Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. This advice is echoed in paragraph 174 of the NPPF*."

Core Policy 57 states that:

"*New development must relate positively to its landscape setting and the existing pattern of development by responding to local topography to ensure that important views into, within and out of the site are to be retained and enhanced. Development is required to effectively integrate into its setting and to justify and mitigate against any losses that may occur through the development*."

Paragraph 180 of the NPPF states;

Planning decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

Notwithstanding the comments of the NLCC, the Council's Landscape Officer has assessed the submissions associated with this application and has no objection to this development proposal.

The received comments refer to the LVA impacts on the fabric of the site itself and conclude that its inherent landscape character will experience harm by way of the change of use from agricultural parcel to a solar farm. However, this change is temporary and the associated landscape mitigation would introduce new planting that positively enhances the area and other matters such as biodiversity. The site is considered to have a relatively low visibility in the wider landscape despite the objections received to the contrary on this matter, and is contained by the topography of Homington Down to the south and south-west preventing views from the NLCC/AONB. The existing tree belt along the A354 screens views of the northern boundary. Whilst the planting of new hedgerow and trees along the north-eastern boundary of the site would take time to establish, the views towards Harnham where views of the Bake Farm solar array are possible would diminish by way of this planting proposed.

As such, whilst the views of the NLCC/AONB are relevant, it is considered that the site is a good location for solar development from a landscape and visual perspective and any impacts can be adequately managed by the following:

(i) there is adequate mature existing vegetation around the nearby operational Bake Farm Solar Farm and the proposed site to mitigate cumulative effects;
(ii) the natural screening afforded by the bowl-shaped landform which rises to the north and towards Homington Down SLA and the existing tree belts on the northern and south western boundaries of the site; and
(iii) considering the comprehensive landscaping scheme proposed that would help to assimilate in time the proposed development into the landscape. The latter including green corridors along the two existing public footpaths, bolstering existing tree belts on the southern and eastern site boundaries, field boundary hedgerow improvements, thus mitigating and minimising the impacts onto these receptors. This is shown by the submitted landscaping scheme DWG No: edp7928_d010 Rev C.

The application site therefore offers something of an opportunity to be able to locate this development (to which there is evidenced need for a lot more capacity by 2050 and to also secure energy security) without causing demonstrable harm to the landscape – and with no received public objections. Therefore, from a countywide cumulative impact perspective, it is not considered that this would add further to those experienced concentrations to which the Written Ministerial Statement is concerned.

In an immediate local context, by way of the bowl shaped topography of the site, the existing and proposed landscape mitigation, any impacts can be suitably mitigated. Officers note the comments of the PROW officer that request a contribution of £40,000 by way of a S106 agreement for the Countryside Access officers to spend on Improvements to the Public Rights of Way network within 5km of the site and the request that the applicant dedicates a new Bridleway starting opposite BRIT14 and linking to BRIT13 this will improve the Public Right of Way network by linking two Public Rights of Way. However, such a request has to be reasonable in terms of context and the development proposal. Officers consider that the financial contribution request and improvement request to the public right of way network by the PROW officer for a development proposal of this type not to reasonable or necessary in terms of the six tests associated with planning conditions.

9.6 Residential Amenity Impacts

Core Policy 57 requires that development should ensure the impact on the amenities of existing occupants is acceptable, and ensuring that appropriate levels of amenity are achievable within the development itself, and the NPPF (paragraph 135f) states that planning decisions should 'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.'

Given the nature of the development proposal, it would not detrimentally impact on the amenity of the area during the operational stage. The nearest properties to the site are known as Wellhouse Farm, and No's 1 and 2 Wellhouse Cottages. Clearly during construction phase, if approved there would be some impacts on these properties, notably from construction traffic. However, such impacts would be intermittent and temporary in nature.

The application is accompanied by a Noise Impact Assessment and a Glint and Glare Report that have been assessed by the Council's Public Protection Officer and no objection is raised to these documents. Furthermore, the siting of associated infrastructure such as inverters and substations would be away from sensitive receptors. The development proposal would be passive in operation and not generate any significant operational noise. Subject to the imposing of conditions around the landscaping and biodiversity measures required, the retention and protection of the existing PROWs during construction and operation along with associated fencing, any amenity impacts by way of the development proposal would be temporary in nature and would be suitably mitigated. As such, officers consider the proposal accords with the requirement of Core Policy CP57 of the WCS.

9.7 Ecological Impact

CP50 of the Wiltshire Core Strategy and the National Planning Policy Framework require that the planning authority ensures protection of important habitats and species in relation to development and seeks enhancement for the benefit of biodiversity through the planning system.

The application has been assessed by the Council's Ecology Team and the following comments are provided:

The application is supported by the following documents:

- *Ecological Appraisal. November 2023. EDP;*
- *Landscape Plan edp7926_d010c. November 2023. EDP;*
- *Development Zone Plan LCS052 DZ-01. October 2020. Low Carbon;*
- *Site Layout Plan External LCS052 PLE-01. October 202. Low Carbon;*
- *Site Location Plan LCS052-SP01. April 2023. Low Carbon;*
- *Shadow Habitats Regulations Report. November 2023. EDP;*
- *Security Fence and CCTV Standard Detail LCS-SD-04.1. February 2023. Low Carbon*
- *Arboricultral Report. November 2023. Tree Heritage*
- *Skylark Mitigation Strategy. March 2024. EDP;*
- *Ecology Technical Note. March 2024. EDP;*
- *Technical Briefing Note. April 2024. EDP;*
- *Framework Landscape Ecological Management Plan. March 224. EDP and*
- *Landscape and Ecology Strategy Plan. March 2024. EDP.*

Protected Species and Habitats –

Bats –

We welcome the bat surveys undertaken in relation to proposed tree works on site and note the recommendations made within the Technical Briefing Note with regards to T17 and T18. Additional surveys have been recommended for T17 due to the presence of multiple PRF's for multiple bats and the nature of the works proposed. This additional survey work must be completed prior to the commencement of works and details of the survey and necessary mitigation measures submitted to and agreed with the LPA.

In addition, we note the mitigation measures proposed on site to support the retention of bat foraging and commuting flight lines which have been included within the Landscape and Ecology Strategy Plan, these include;

- *A minimum 10m build buffer between all boundary hedgerows and development;*
- *An additional 10m no build buffer between the woodland and development;*
- *Neutral grassland planting along the buffers to be managed for the benefit of biodiversity*
- *The retention of boundary hedges and some double hedge planting with in-boundary trees included*
- *Infill hedgerow planting to reduce gapping.*

Skylark –

We welcome the skylark mitigation strategy submitted in support of the application. We note from the strategy that additional land within the blue line boundary (as outlined in Appendix EDP2) will be required to support the strategy. As this is outside of the red line boundary this strategy will require a separate legal agreement prior to determination. Additional information to include a landscape plan, outlining the locations of the proposed skylark mitigation plots will be required in order to support this proposal.

A number of Reasonable Avoidance Measures have been included within the Ecological Appraisal Report for badger, breeding birds and reptile. These integrated mitigation measures are welcomed and can be secured through a construction environment management plan. Further mitigation is proposed in the form of bird and bat boxes, the detail of which have not been included. This information could be secured through condition.

In addition, we note the gird connection route will be secured through a separate application.

Hampshire River Avon Catchment –

This development falls within the catchment of the River Avon SAC and has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorus in wastewater. A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that as the proposals are for the construction and operation of a solar photovoltaic farm there is no mechanism for adverse effect and operational impacts would be de-minimis.

New Forest Protected Sites 13.8km Recreation Zone of Influence –

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This concluded that given the scale and nature of the development, there is no mechanism for adverse effect and operational impacts would be de-minimus. The HRA has concluded that the application is not likely to have significant impacts on the SAC and Appropriate Assessment is not required.

Biodiversity Net Gain –

We welcome the submission of the unlocked BNG metric. From the information submitted it appears that net gain has been met through the inclusion of new hedgerows, together with the creation and enhancement of grassland meadows. We note that the application is also supported by the updated Landscape and Ecology Strategy Plan.

HMMP –

A number of proposals have been recommended to enhance biodiversity on site through the BNG Assessment with the proposed management outlined within the FLEMP document submitted. Additional information will be required as outlined within our previous response. This could be conditioned.

Decommissioning –

A condition will be required to ensure an appropriate decommissioning and restoration plan is submitted to and agreed with the council a minimum of 12 months prior to commissioning. The condition must ensure the plan will be supported by an impact assessment based on up to date baseline survey and carried out according to the current guidelines. It must set out clear ais of restoration to benefit key habitats and species.

Conditions recommended.

9.8 Highway Safety

Core Policy 62 (Development Impacts on the Transport network) of the Wiltshire Core Strategy states:

"Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages. Proposals for new development should not be accessed directly from the national primary route network outside built up areas, unless an over-riding need can be demonstrated."

The site is bounded to the north by the A354 Salisbury Road with access to be provided to and from the site by existing vehicular accesses served by Homington Road to the east of the site. The Council's Highways Officer has assessed this proposal with the comments detailed in full within the consultee response section of this report. The comments received raise no objection to the proposal subject to the imposing of the following or suitably worded conditions to address highway matters.

9.9 Heritage / archaeology

The application is accompanied by a Cultural Heritage Assessment (CHA) to address the matters of built heritage and archaeology. It is also accompanied by archaeological surveys and associated reports that have been assessed by the Council's Archaeology Team and Conservation Officer respectively.

In terms of heritage impacts, the Conservation Officer has no comments as the proposal would not have an impact on the setting of any heritage assets.

In terms of archaeological impact, initial concerns were raised by the Archaeology Team to this proposal but subsequent updated reports that sets out a programme of archaeological work to mitigate the impacts of the proposed development have been provided. Following an

assessment of these additional reports, the Archaeology Team now have no objection to the proposal subject to the imposing of the two following conditions.

9.10 Flood Risk

CP 67 of the WCS states that all new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (SUDs) unless site or environmental conditions make these measures unsuitable.

It is recognised that solar farms are considered to have a relatively low risk in relation to their contribution to surface water flooding, and that surface water flood risk mitigation measures should be in place. It is acknowledged that the site does not fall within a flood plain and is located in Flood Zone 1 which is the lowest designation of flood zone and one wherein development such as that proposed is acceptable in principle.

The application site is also not subject to surface water or groundwater flood risk (with the 2019 Strategic Flood Risk assessment finding that ground water level is at least 5 metres below ground surface).

The application is accompanied by a site specific Flood Risk Assessment that has been assessed by the Council's Drainage Team. No objection is raised to this proposal subject to the imposing of conditions around a construction management plan with details of drainage arrangements. Subject to suitably worded conditions imposed onto any consent, any drainage or flood risk will be suitably mitigated.

10. Conclusion and Planning Balance

The proposed development is for the installation of a renewable led energy scheme comprising ground mounted photovoltaic solar arrays together with transformer stations and ancillary infrastructure. A further application will be submitted to the Local Planning Authority for the point of connection in due course should the committee be minded to approve this proposal. This scheme also benefits from a grid connection agreement that is linked to this site gaining approval. As such, it is considered that the proposed development is sustainable development that will make a significant contribution to the supply of renewable energy helping to reduce carbon emissions required to meet the Climate Change Act 2050 net zero target and Wiltshire's own commitment to being carbon neutral by 2030.

The last government's energy security strategy, published in April 2023, contained various measures to deal with the UK's energy crisis and achieve its net-zero targets, including a pledge to ramp up solar power capacity from 14 gigawatts (GW) to 70GW by 2035. To further underline this the Climate change act 2008 (2050 Target Amendment) Order 2019 raised the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline (previously 80%).

It is considered that the principle of the proposed development is in accordance with current national and local planning policies, which are supportive of renewable energy schemes. The proposal is a large scheme that would provide a valuable contribution towards cutting greenhouse gas emissions. This attracts considerable weight in the overall planning balance, along with other benefits such as the ecological enhancements and biodiversity net gain that would be secured by the development, and associated local economic benefits associated with the construction phase. Wiltshire Council's motion also confirms that the Council is "…. *not opposed to the principle of the development of solar farms in line with the National Planning Policy Framework*".

The large volume of written objections to this proposal from members of the public and the NLCC Group have been carefully considered. Officers consider there is potential for an effect on the immediate landscape which is not unsurprising given that national and local policy recognise that large scale solar farms may result in some landscape and visual harm. However, given the topography of the land and the existing and proposed landscaping screening mitigation, this would lead to very limited and highly localised landscape and visual effects and these would be progressively mitigated by additional planting. These factors lead to the conclusion that the proposal would not conflict with local or national policy.

It is also concluded that the proposal would not be in conflict with either the Written Ministerial Statement (WMS) or the Wiltshire Council Motion. As confirmed by the Climate Change Officer it is unlikely that rooftop solar panels alone would not meet the MW requirement and it's also considered unlikely that sufficient previously developed land would be found at scale. Therefore, it's not 'possible' in this instance to find alternatives to agricultural land. Whilst it is unfortunate that there will be some loss of grade 3a land, less than 50% of the site is within the definition of best and most versatile agricultural land and through the provision of habitat suitable for grazing, then the land would remain in viable food production use. Thus, gaining positive weight in favour of granting approval for this proposal.

The proposal would generate a significant amount of renewable energy (circa 30MW), which the developer sets out would provide enough power to service the equivalent of around 9,642 homes. By reducing the need to generate electricity through the burning of fossil fuels, which result in the emission of greenhouse gases, this scheme would help to mitigate climate change impacts.

Whilst it is duly acknowledged that there would be immediate local cumulative impacts from the development site proposal and its relationship with the existing Bake Farm Solar Farm to the north of the site, it is considered that the proposed development by way of the proposed landscape mitigation will integrate well into the landscape and not caused undue harm to the immediate area or wider landscape.

Other benefits of this proposal include the biodiversity net gain in excess of policy requirements needs to be apportioned positive weight too. Having regard for this and the other ecological benefits of this proposal, it is considered that the proposed development can be undertaken without having an adverse impact on protected species or their habitat. The proposed scheme also includes the introduction of green infrastructure and habitat creation which are considered to represent an ecological enhancement. Subject to conditions as suggested by the Council's ecologist, the measures proposed will ensure that the site retains the functionality of its habitats for wildlife. It is considered that the acknowledged benefit of the additional planting, which would remain after the end of the limited period, should be accorded significant weight.

It is acknowledged that during the construction period there could be some disruption on local highway networks and amenity impacts to the nearby surrounding properties on Homington Road . However, this disruptions would be only for a relatively short period of time and there would be measures in place to minimise such disruption and inconvenience through the conditioning of a Construction Management Statement. With such conditions in place, it can be concluded that there would be no detrimental impacts to the highway network or to highway safety in general.

Further archaeological investigation would be required, and this can be controlled through condition. No harm would be caused to other designated heritage assets.

Whilst the scheme would lead to a small degree of very local and short-term negative impact on the landscape, the impact must be balanced by the benefits which would accrue from a

renewable energy generator leading to less reliance on carbon. The proposed development would make a significant contribution towards Wiltshire's renewable energy target and as such it is considered that the overall environmental, economic and social benefits associated with the proposal outweigh any limited harm.

It is therefore considered that, on balance, the public, environmental and economic benefits of the proposal outweigh the limited harm identified. It is therefore recommended that the application is granted permission subject to conditions.

11. **RECOMMENDATION:**

Having had regard to all environmental information accompanying the planning application, approve with conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

   REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. No development hereby approved shall commence until a planning application for associated infrastructure to achieve grid connection from the development has been submitted to and approved in writing by the relevant planning authority.

   REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed before development commences in order that the development is undertaken in an acceptable and comprehensive manner, to ensure a satisfactory, landscaped setting for the development and the protection of existing important landscape features and the setting of the National Landscape.

3. The development hereby permitted shall be carried out in accordance with the following approved plans and details:

   - DWG No: LCS052-SP-01 Rev 03 Site Location Plan Date Received 29.11.23
   - DWG No: LCS052-DZ-01 Rev 06 Development Zone Plan Date Received 19.03.24
   - DWG No: edp7926_d010c Landscape and Ecology Strategy Plan Date Received 19.03.24
   - DWG No: LCS052 PLE-01 Site Layout Plan External Date Received 19.03.24
   - Glint and Glare Study dated February 2024 Date Received 14.03.24
   - Skylark Mitigation Strategy dated March 2024 prepared by EDP Date Received 19.03.24
   - Ecology Technical Note dated March 2024 prepared by EDP Date Received 19.03.24
   - Technical Briefing Note dated March 2024 prepared by EDP Date Received 19.03.24
   - Framework Landscape Ecological Management Plan dated March 2024 prepared by EDP Date Received 19.03.24
   - Landscape and Visual Assessment Report dated November 2023 prepared by EDP Date Received 29.11.23
   - Noise Assessment Report ref 784-B043545 dated November 2023 prepared by Tetra Tech Date Received 29.11.23

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

4. No development shall commence on site until full details (which must be within the parameters set out in the submitted Planning Design and Access Statement dated November 2023) of the final layout, locations and dimensions, design, materials and colour (where appropriate) to be used for the panel arrays, battery storage, inverters, substation, control building, switch room, CCTV cameras, fencing and any other components of the scheme have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details and thereafter retained for the lifetime of the development.

   REASON: For the avoidance of doubt and proper planning.

5. The development hereby permitted shall not exceed the limits as shown on approved plan DWG No: LCS052-DZ-01 Rev 06 Development Zone Plans Plan.

   REASON: For the avoidance of doubt and proper planning.

6. The proposed development shall only be undertaken in accordance with the 'Written Scheme of Investigation for an Archaeological Excavation' prepared by Cotswold Archaeology, dated 26 March 2024, reference AN0851, unless otherwise agreed in writing with the Local Planning Authority.

   REASON: In order to record and advance understanding of the significance of any heritage assets to be lost in a manner proportionate to their importance and to make this evidence and any archive generated publicly accessible.

7. No development shall commence within the area indicated by the red line boundary on Low Carbon's Site Location Plan, Drawing No. LCS052-SP-01 Rev 03 until the construction details of the access track and construction compound have been submitted to and approved in writing by the Local Planning Authority.

   REASON: In order to record and advance understanding of the significance of any heritage assets to be lost in a manner proportionate to their importance and to make this evidence and any archive generated publicly accessible.

8. No development shall commence on site (including any works of demolition), until a Construction Management Statement, together with a site plan, which shall include the following:

   - the parking of vehicles of site operatives and visitors;
   - loading and unloading of plant and materials;
   - storage of plant and materials used in constructing the development;
   - the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
   - wheel washing facilities;
   - measures to control the emission of dust and dirt during construction;
   - a scheme for recycling/disposing of waste resulting from demolition and construction works; and
   - measures for the protection of the natural environment.
   - hours of construction, including deliveries;

- pre-condition photo survey - any damage related to the development will be put right (to the satisfaction of the LHA) within 6 months of the development completion.
- How access will be maintained and managed for all users of Homington Road throughout the construction phase.
- Pre-condition Survey: A photographic pre-condition (and post condition) highway survey

has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The development shall not be carried out otherwise than in accordance with the approved construction method statement without the prior written permission of the Local Planning Authority.

REASON: To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.

NOTE: The applicant should be informed that the Highway Authority will pursue rectification of any defects identified by the highway condition survey which can be attributed to the site construction traffic under the provision of S59 of the Highways Act.

9. No part of the development shall be first brought into use until the visibility splays shown on the plan ref:410558-MMD-XX-BA21-DR-C-003 (Appendix B in the Transport Report) have been provided with no obstruction to visibility at or above a height of 900mm above the nearside carriageway level. The visibility splays shall always be maintained free of obstruction thereafter.

   REASON: In the interests of highway safety.

10. Any entrance gates shall be set back 5m from the edge of the carriageway for the Operational Access and at least 10m from edge of carriageway for the Construction Access, such gates to open inwards only.

    REASON: In the interests of highway safety.

11. The development hereby permitted shall not be first brought into use until the area between the edge of the carriageway and the gates (Operational Access) has been consolidated and surfaced (not loose stone or gravel). The access shall be maintained as such thereafter.

    REASON: In the interests of highway safety.

12. Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

    - dentification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.

- Working method statements for protected/priority species, such as nesting birds and reptiles.
- Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.
- Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
- Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).
- Timeframe for provision of compliance report to the local planning authority; to be completed by the ecologist/ECoW and to include photographic evidence.

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

13. Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.

    The LEMP shall also include details of the legal and funding mechanism(s) by which long- term implementation of the plan will be secured. The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

    REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

14. Prior to the commencement of the development a Skylark Mitigation Strategy to compensate the loss of any Skylark territories shall be submitted to and approved by the local planning authority. The strategy shall include the following:

    a) Up to date base line surveys of the development land and proposed mitigation area.
    b) Evidence of the number of Skylark nest plots required.
    c) A drawing specifying the location of exiting Skylark territories and proposed
    d) Skylark mitigation plots.
    e) Details of the purpose and conservation objectives for the proposed Skylark nest plots.
    f) Detailed management plan including required operations of Skylark mitigation plots.
    g) Details of persons responsible for implementing the strategy.
    h) Details of monitoring and reporting methods including pathways for remediation.

The Skylark Mitigation Strategy shall be implemented in accordance with the approved details and all features shall be retained for the life time of the approved development until deconstruction is completed.

REASON To provide mitigation and enhancement for biodiversity.

15. Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of bat roosts and nesting opportunities for birds shall be submitted to the local authority for approval. The approved details shall be implemented before occupation of the final works and shall remain for the lifetime of development.

    REASON: To provide mitigation and enhancement for biodiversity.

16. No work shall commence on site until evidence of further Bat Surveys have been submitted to and approved in writing by the local planning authority. The report shall contain details of survey work to establish whether bats are present within existing trees on site and if so, the necessary details to enable a full assessment of impacts of development on bats as well as all necessary mitigation measures. The latter will include times when a professional ecologist will be present to oversee the works and whether a European Protected Species Licence is required to enable the work to proceed. The works shall be undertaken in complete accordance with the approved details.

    REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter must be agreed with the Local Planning Authority before development commences to ensure the development mitigates for potential disturbance to protected species.

17. No external light fixture or fitting shall be installed within the application site unless details of the proposed new lighting has been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation. The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 “Bats and artificial lighting at night”, issued by the Bat Conservation Trust and Institution of Lighting Professionals.

    REASON: In the interests of conserving biodiversity.

18. In the event that the development ceases to be operational, then all associated development on, under or above the application site shall be removed from the site and the land returned to its former condition in accordance with a Decommissioning Plan to be first submitted to and approved in writing by the Local Planning Authority prior to the commencement of decommissioning, and within six months of the cessation of the use of the site.

    REASON: In the interests of amenity of the Special Landscape Area and the circumstances of the use.

19. Prior to the development hereby approved being decommissioned, the applicant shall submit an ecological assessment and mitigation report for approval by the Local Planning Authority. The site shall then be decommissioned in accordance with the approved details.

REASON: To ensure that protected species are not harmed through the removal of the equipment having regard to guidance contained in the NPPF.

20. No development shall commence on site until a construction management plan and land management plan, which shall include monitoring of, and measures to retain, the existing vegetation across the site, together with details of drainage arrangements during the construction phase, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. Development shall be carried out in accordance with the approved details.

    REASON: To ensure the development can adequately drain.

21. All landscape planting shall be undertaken in accordance with DWG No: edp7926_d010c Landscape and Ecology Strategy Plan and the Landscape and Visual Appraisal ref: edp7926_r0002A and maintained as such thereafter.

    All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the completion of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

    All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority.

    All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

    REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features and to ensure that the site is satisfactorily landscaped in order to support protected species and their habitats.

22. All deliveries of solar panels and any other associated construction materials of the development hereby approved shall be confined to between the hours of: 0730 to 1800 Mondays to Fridays; and at no times on weekends or bank holidays

    REASON: In the interests of neighbouring amenity.

23. The development shall be carried out in accordance with the submitted Arboricultural Report undertaken by Tree Heritage ref: THL-R23-110 dated November 2023 in accordance with the relevant British Standard (Guide for Trees in Relation to Construction, BS.5837: 2012).

    The trees must be protected in accordance with the approved statement throughout the period of development, unless the Local Planning Authority has given its prior written consent to any variation.

    REASON: To comply with the duties indicated in Section 197 of the Town and Country Planning Act 1990, so as to ensure that the amenity value of the most important trees,

within or adjacent to the site, are adequately protected during the period of construction.

INFORMATIVE TO APPLICANT:

1. **Bats**
   There is a low risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Batline through the internet.

2. **Nesting Birds**
   All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

3. **Reptiles**
   There is a residual risk that reptiles could occur on the application site. These species are legally protected and planning permission does not provide a defence against prosecution. In order to minimise the risk of these species occurring on the site, the developer is advised to clear vegetation during the winter, remove all waste arising from such clearance and maintain vegetation as short as possible. If these species are found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the Council Landscape and Design Team (ecologyconsultations@wiltshire.gov.uk).