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Our Ref: 16364

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Dear Mr Richardson,

REQUEST FOR SCREENING OPINION UNDER REGULATION 6 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

PROPOSED SOLAR PHOTOVOLTAIC FARM, BATTERY STORAGE AND ASSOCIATED INFRASTRUCTURE – LAND SOUTH OF SALISBURY ROAD, NEAR HOMINGTON, WILTSHIRE

We write on behalf of our client, Low Carbon UK Solar Investment Company Ltd to formally request from Wiltshire Council (the 'Council') an Environmental Impact Assessment ('EIA') Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regs').

Updated EIA Screening Request

This Screening Opinion Request forms an update to one previously considered under EIA Screening Opinion Request ref. PL/2023/03063, submitted to the Council on 14 April 2023 for a proposed solar photovoltaic farm and associated infrastructure (the 'original proposal') on land to the south of Salisbury Road, near Homington, Wiltshire (the 'Site'). The Council issued its previous screening opinion on 4 May 2023 which confirmed that the original proposal would constitute EIA development on the grounds of potential transport impacts during construction. Further to this, on 17 May 2023, the Council advised by email that it also considered the Proposed Development to constitute EIA development on the grounds of landscape and visual impacts.

This updated EIA Screening Opinion Request takes account of significant reductions to the site area, in addition to changes to the proposed access point and inclusion of battery storage (18 Megawatts ('MW')). As such the proposed development now comprises a proposed solar photovoltaic farm, battery storage (18MW) and associated infrastructure at the Site. The changes to the site area shown by the red line boundary ('RLB') (Appendix 1) includes the removal of the western most field and north-western parcels which adjoin Salisbury Road (A354) to the south. The total updated site area is approximately 41 hectares ('ha'), which is a decrease of approximately 28 ha (or 40%) when compared with the original proposal. The change in area is shown in Figure 1 below.

The 40% reduction in site area will mean a much lower potential for landscape and visual impacts, including cumulative impacts with the nearby Bake solar farm, and a sizable reduction in the number and frequency of heavy goods vehicle ('HGV') movements during construction compared with the Original Proposal. The access point is relocated to the north on Homington Road, approximately 558

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metres ('m') south of the A354 junction, which reduces the length of Homington Road travelled by construction vehicles by approx. 51% (from 1.15km south of the A354). The reduction in HGV movements and length travelled along Homington Road will reduce the environmental impact on Homington Road and surrounding infrastructure. These points are discussed further in the relevant sections of this Letter.

The Site comprises of agricultural land located to the south of Salisbury Road (A354), east of Coombe Bissett, south of Harnham and Salisbury, and to the north of Homington (the 'Site') (see Appendix 1).

The Proposed Development responds to identified need by providing a renewable energy supply that would reduce carbon emissions and assist in establishing a greater diversity of energy sources in the UK.

Figure 1. Comparison of site area and access point

The RLB and access point screened as part of the Original Proposed (Ref. PL/2023/03063) are shown in yellow and the revised RLB and access point proposed to be screened via this submission are shown in red.



REQUIREMENT FOR EIA

The EIA Regulations cover two main types of development:

- Schedule 1 – identifies all types of projects for which EIA is mandatory; and
- Schedule 2 – identifies the types of projects for which EIA may be required if the project in question is considered likely to give rise to significant environmental effects.

The Proposed Development does not constitute Schedule 1 development as for energy projects, this applies to thermal power stations with a heat output of 300 MW or more and nuclear power stations.

It is considered that the Proposed Development constitutes Schedule 2 of development under Section 3(a) of Schedule 2:

"industrial installation for the production of electricity, steam and hot water (unless included in Schedule 1"

Development proposals described under Schedule 2 require an EIA if they are considered likely to have significant effects on the environment by virtue of factors such as nature, size and location.

The Site, at approximately 41.0 ha, exceeds the applicable threshold of 0.5 ha site area. Subsequently, there is a requirement under provisions of the EIA Regs to screen the Proposed Development in order to determine whether or not an EIA is required.

SCREENING REQUEST SCOPE

Regulation 6(2) of the EIA Regs requires a request for a screening opinion to be accompanied by:

- a plan sufficient to identify the land;
- a description of the development; including in particular a description of the physical characteristics of the development and a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- a description of the aspects of the environmental likely to be significantly affected by the development;
- a description of any likely significant effects of the Proposed Development on the environment resulting from expected residues and emissions and use of natural resources, in particular soil, land, water and biodiversity; and
- such other information or representations as the person making the request may wish to provide or make.

This letter and enclosures provide the following information:

- a description of the Site, its planning designations and the nature and purpose of the Proposed Development;
- an assessment of the possible environmental effects of the Proposed Development and consideration of these within the context of the guidance on EIA;
- a Red Line Boundary Site Plan, with the boundary of the Site coloured red;
- a MAGIC map, a Flood Map for Planning and an extract from the Local Plan Proposals Map, showing designations/allocations in the area;

- images and technical data relating to the proposed solar farm and associated infrastructure; and
- Zone of Theoretical Visibility (ZTV) and Suggested Representative Viewpoints, prepared by EDP.

The RLB in the landscape documents listed above and contained in Appendix 3 is superseded by the RLB shown in 'Appendix 1: Red line boundary site plan' of this letter. Any future planning application would be informed by surveys and assessments undertaken in accordance with the RLB shown in Appendix 1.

The remainder of this letter considers the Proposed Development within the context of the guidance provided on the potential need for EIA. It follows that the Applicant accepts that the Proposed Development is likely to result in some potential environmental effects however these are anticipated to be of a limited nature. This letter seeks to demonstrate in further detail that the Proposed Development (with reference to its size, nature and location) will not require an EIA and the preparation of an Environmental Statement ('ES').

SITE LOCATION AND DESCRIPTION

The Site comprises approximately 41 hectares ('ha') of agricultural land and is separated into two interconnecting parcels. The Site is located within the administrative area of Wiltshire Council. It comprises two agricultural fields set broadly within a rectilinear field pattern and is physically contained by the A354 to the north. The Site lies to the east of Coombe Bissett, south of Harnham and Salisbury, and to the north of Homington. The red line boundary site plan is in Appendix 1.

According to the nationally available Agricultural Land Classification ('ALC') Provisional data, the Site is understood to comprise Grade 3 agricultural land (good to moderate quality). An ALC Survey for the Site confirms that it is a mix of Grade 3a ('Best and Most Versatile' [BMV] land) and Grade 3b (Moderate Quality), this would accompany any future planning application. It should be noted that while the site area includes some BMV land, it is a significant reduction in the amount of BMV included in the original area under Screening PL/2023/03063.

The Site is situated within a largely rural and agricultural setting, and is partly bounded by a mixture of deciduous tree belts and some broken hedgerows with occasional hedgerow trees. The Homington Downs Special Landscape Area (SLA) adjoins the Site in the south and agricultural fields on the eastern and western boundaries. The northern boundary adjoins the A354 with agricultural fields and a solar farm further afield to the north.

The surrounding area is characterised by a number of agricultural fields interspersed by woodland with settlements and scattered residential properties to most sides; an existing solar farm and campsite to the north, residential settlements to the north-east; scattered residential properties and settlements, including the Salisbury District Hospital to the east; residential settlements to the west; and the Homington Downs SLA, and Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (the 'AONB'), and residential settlements to the south.

The nearest residential settlements include:

- Homington, 700 m to the south and separated by the Homington Downs.

- Coombe Bissett, 700 m to the south west separated by the A354.
- Harnham Hill 1.3 km to the north-west separated by the A354 and Homington Road.

A Public Right of Way ('PRoW') runs north-south through the centre of the Site and then turns east to connect to a different PROW that traverses the southern boundary. There is also a series of connected public footpaths on the southern boundary of the Site.

PLANNING AND ENVIRONMENTAL DESIGNATIONS

A review of the Wiltshire Council Core Strategy and Adopted Policies Map 2015 (**Appendix 2**) indicates that the Site is subject to the following designations:

- Special Landscape Area – wholly within.

The MAGIC Map in Appendix 2 confirms that the Site is not covered by any national or international designations or environmental assets that relate to biodiversity and landscape, nor are there any directly adjacent to the Site. There is a Tree Preservation Order ('TPO') on the northern boundary adjoining the A354 which covers priority habitats 'Deciduous woodland'.

The MAGIC Map in Appendix 2 shows that the Site is not covered by any national or international designations which relate to Cultural Heritage. However, the Wiltshire Historic Environment Record (as accessed via Wiltshire Council) indicates the following known heritage assets on the Site: SU12NW615 Undated field system, Homington Down – An undated field system.

There are a number of Scheduled monuments within 2 km of the Site, and the Coombe Bissett and Homington Conservation Areas are within 1km to the west and 690m to the south, respectively.

The Site is located entirely within Flood Zone 1, the zone at least risk of flooding (**Appendix 2**). Due to the size of the Site being in excess of 1 ha, any planning application would be accompanied by a Flood Risk Assessment and Drainage Strategy.

As mentioned above, the following PRoWs are within and adjoining the Site (Appendix 2): public footpath that runs north-south through the eastern part of the Site (BRIT13) before turning east to traverse the southern boundary (BRIT20). There is also a series of connected public footpaths along the southern boundary of the Site (BSIS6-CBIS20-BRIT12).

THE PROPOSED DEVELOPMENT

The Proposed Development responds to the identified need by providing a renewable energy supply that would reduce carbon emissions and assist in establishing a greater diversity of energy sources in the UK.

The Proposed Development would include the following equipment (approximate):

- rows of solar photovoltaic ('PV') panels;
- up to around 12 batteries within shipping containers (or similar) located within a single compound;
- inverters and batteries within shipping containers (or similar);
- cabling and two substations;

- internal access tracks;
- perimeter fence; and
- CCTV cameras.

The information provided on layout and design within the planning application would be based on the principles of the 'Rochdale Envelope'. This means that maximum design parameters would be adopted for the equipment to provide sufficient flexibility for the later detailed design of the Proposed Development (detailed design would take place post grant of planning permission following appointment of a contractor), while also allowing for the robust assessment of environmental effects (this assessment being based on maximum 'worst case' parameters).

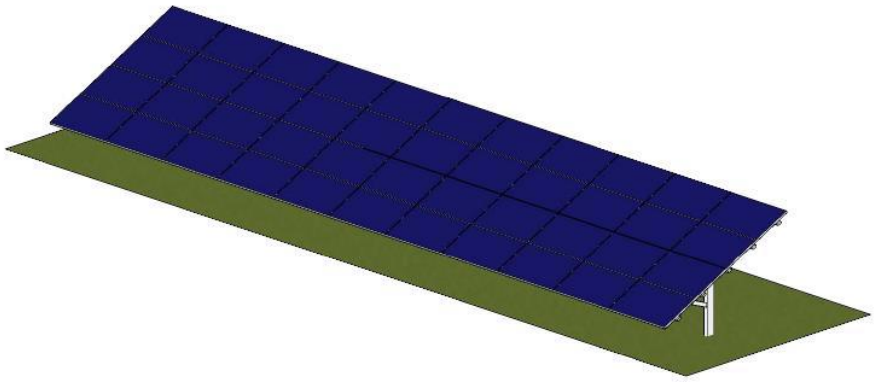
Solar PV Panels

The solar panels would be laid out in rows running from east to west across the Site. There would be a gap of approximately 3-4 m between each row. The panels would be mounted on a frame, to be installed using spiked foundations of approximately 1-2 m deep.

The panels are typically mounted in four horizontal rows, with one row fixed directly above the other, and angled at the optimum position for absorbing year-round solar irradiation. At the lowest edge the arrays would be approximately 0.9 m from the ground and up to approximately 3.0m at the highest edge.

An example of a row of arrays is shown in Figure 1 below.

Figure 1 – Example row of panels



Batteries

The batteries would be contained within shipping containers or similar cabin type structure located within a single compound rather than spread across the Site. Each cabin would measure up to approximately 12 m long, 2.6 m wide and 2.9 m high. Each cabin would be placed on a hardcore/concrete base, with a stepped access at one end.

Each battery would be located adjacent to heating, ventilation and cooling ('HVAC') units; and a battery power conversation system, which performs a similar role to the inverters (see the 'Inverters' sub-section for more detail).

The batteries would charge at off-peak times and then supply electricity to the local electricity distribution network at times of peak energy demand and/or when solar irradiation levels are lower

and the solar panels are generating electricity. This means that the Proposed Development can supply electricity to the local distribution network for longer. An example cabin is shown in Figure 2 below.

The location of the battery storage would be designed and sited to minimise impacts on landscape, ecology, archaeology and built heritage and flooding, through an iterative design process with the applicants subject matter experts, whilst also having regard to the operational requirements for its location.

Inverters

The inverters and batteries would be within containerised units similar to shipping containers. Each unit would measure approximately 12.2 m long, 2.5 m wide and 2.9m high. Each unit would be placed on a concrete base (with up to 1m deep foundations) and would be similar in appearance to the image in Figure 2 below.

The inverters would convert the direct current ('DC') generated by the solar panels into alternating current ('AC'). Transformers, contained within the inverter cabins, convert the low voltage output from the inverters to high voltage suitable for feeding into the local electricity distribution network.

Figure 2 – Example Cabin



Substations

The Proposed Development would connect into the existing substation off Homington Road. The substation would measure approximately 6m long, 2.7m wide and 3m high. Each cabin would be placed on a concrete base. The structure would either be clad in brick or wood to comply with local vernacular, or coloured green (or in any other colour) to minimise any visual impact. This would be agreed with the LPA. The proposed substation (example) is shown in Figure 3 below.

The solar panels would feed DC electricity into the inverters. This would be converted to AC electricity to be transferred through the switchrooms, through the meters, to the substation before stepping up the voltage to feed into the grid via a 11kV connection. The substations, inverters and solar panels would be connected by underground electrical cables.

Figures 3 – Meter Room and Customer Switch Room



Access

It is currently envisaged that the Site could be accessed via a private road/farm entrance off Homington Road. This access point can already accommodate agriculture and large vehicles and therefore it is envisaged to be suitable for the HGVs. A Transport Report would be prepared for any future planning application to determine whether any improvements, such as localised widening, would be needed.

Site access tracks would be utilised to facilitate movement within the Site for construction and maintenance. It is envisaged that topsoil layers would be excavated to expose a suitable base on which to build the track. The track would then be built up by laying crushed stone, rolled in layers. It is envisaged that the tracks would utilise existing access points between field and crossing points over ditches.

Security

The Proposed Development would need to be secure. It is envisaged that deer fencing (mesh with wooden posts or similar) to a height of approximately 2 m would be installed along the outer edges of the Site in order to restrict access.

This would be sited inside the outermost hedges/trees/vegetation, ensuring that the fence is visually obscured, and access is available for hedge trimming and maintenance. Gates would be installed at the access point for maintenance access. These would be the same design, material and colour as the fencing.

The perimeter of the Site would be protected by a system of CCTV cameras and/or infra-red cameras, which would provide full 24-hour surveillance around the entire perimeter. An intelligent sensor management system would manage the cameras. The cameras would be on poles of up to approximately 4 m high, spaced at approximately 50 m intervals along the security fence. There would be no lighting within the Site at night-time.

The proposed cameras and fencing are shown in Figures 4 and 5.

Figure 4 – Example camera



Figure 5 – Example fence



Landscaping and biodiversity

The Proposed Development would be designed to respect the character of the landscape and use the strong field boundaries to integrate the scheme into the landscape as far as practicable. Existing landscape features would be protected and strengthened. It follows that all trees and hedgerows on/around the Site would be retained and additional planting provided, where necessary, to fill gaps in the existing boundary planting.

Key landscaping proposals include:

- establishing flora margins/buffer strips along field boundaries, between the boundary hedge/vegetation and the proposed fence;
- elsewhere sowing areas with a species-rich wildflower grassland mix, including beneath and in between rows of solar panels;
- retaining all existing woodland, trees and hedgerows (and field margins generally) within and adjacent to the Site, to retain the sense of enclosure and avoid opening long views;
- providing enough space for new/replacement hedgerows and vegetation to be planted, to integrate the Site into the surrounding landscape as far as practicable; and

- using native species only.

An example of screen planting provision ('before' and 'after') at a different site is provided in Figures 6 and 7 below.

Figure 6 – Before planting provision (example)



Figure 7 – After planting provision (example)



Construction

The construction phase of the Proposed Development is expected to last for approximately 18-20 weeks. During this period, initial site setup works would take place followed by construction of the internal access route(s), ground works, and the installation of the solar panels and other infrastructure.

Facilities would be provided on site for construction workers, including provision of a site office and welfare facilities (including toilets, changing and drying facilities, and a canteen). Fencing would be installed around the perimeter of the Site, as discussed, and temporary parking would be provided for the construction workers.

During the 20-week construction period, it is proposed that construction working hours would be as follows:

- 08:00 – 18:00 Monday to Friday;
- 08:00 – 13:00 Saturday.

Operation

Once operational, occasional maintenance of the solar panels and other infrastructure would be required. The solar panels also would also need to be periodically cleaned, most likely using simply soap and water, to ensure the efficient running of the system.

It is expected that under normal circumstances no more than 4 cars/vans would visit the Site each week (generally spread to less than 1 a day).

The Site would be retained in agricultural use for the life of the Proposed Development. Most of the Site would be planted with a combination of grassland/meadow, which would enable grazing (sheep). This would include land between and underneath panels.

Decommissioning and restoration

At the end of the Proposed Developments' lifespan (i.e. circa 40 years), the solar panels and other infrastructure would be removed, and the Site restored. The small quantity of foundations, hard surfacing and heavy infrastructure mean, in combination with retaining most of the Site as grassland, mean that the land would be easier to restore than other more intrusive development, e.g. large buildings requiring significant foundations.

The restoration process is intended to ensure that the land is restored to the same quality as it was previously, and it is envisaged this would be secured through a suitable condition attached to any planning permission.

ASSESSMENT OF POTENTIAL ENVIRONMENTAL EFFECTS

Schedule 3 of the EIA Regs identifies criteria that should be considered in screening Schedule 2 developments in terms of the need for EIA. These encompass the characteristics of the Proposed Development, including the cumulation with other development; the location of the development; the environmental sensitivity of the area; and the characteristics of the potential impact.

The Secretary of State's view is that, in general, EIA is only needed for Schedule 2 development in three main types of case:

- for major developments that are of more than local importance;
- for developments that are proposed within a particularly environmentally sensitive or vulnerable location; and
- for developments with unusually complex and potentially hazardous environmental effects.

Paragraph 018 Reference ID 4-018-20170728 of the Government's Planning Practice Guidance provides guidance in relation to the need for EIA for Schedule 2 development that:

"Only a very small proportion of Schedule 2 development will require an assessment. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment…To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced."

The guidance further states:

"…it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits."

An assessment as to whether the Proposed Development requires EIA is set out below:

Environmentally sensitive areas– the Site is not covered by any national or international designations or environmental assets that relate to biodiversity and landscape, nor are there any directly adjacent to the Site. However, the Site is within a local landscape designation, which is discussed later. There is one TPO on the northern boundary which comprises 'Deciduous woodland' priority habitat.

The environmental sensitivity of the location is an important factor in determining whether EIA is required. In this case, the Site is within a location that is considered to be of relatively low environmental sensitivity and certainly not the type of location where the EIA Regs indicate that there would be the need for an EIA. A Phase 1 walkover survey and arboricultural survey and impact assessment will be undertaken to confirm the ecological and tree constraints on and nearby the site, including mitigation measures for trees and priority habitats (e.g. appropriate buffers), and will inform the planning application.

The Site is located in a local landscape designation (Special Landscape Area; SLA) and in close proximity to an AONB, and this is discussed below under *Landscape and Visual Impact*.

Land use and agricultural land quality – according to the nationally available Agricultural Land Classification ('ALC') Provisional data, the Site comprises Grade 3 (good to moderate quality) agricultural land. The precise grading of the land has been confirmed by an ALC Survey which identified Grade 3a BMV land (19.3ha) and Grade 3b (Moderate Quality) non-BMV land (20.0 ha). This is a significant reduction of Grade 3a BMV land than in the original site area (under screening PL/2023/03063) of 33.4 ha, representing a reduction in 14.1 ha of BMV land within the revised site area.

Any forthcoming application would be submitted alongside this ALC Survey and an Alternative Site Assessment which has been prepared and which demonstrates that there are no more feasible alternative sites on lower grade agricultural land. Sheep grazing and grass collection for feed often form part of the land management of the Site, allowing a form of agricultural use to continue and most of the Site would be planted with a combination of grassland/meadow, including land between and underneath panels. This scenario would allow agriculture and renewable energy generation to be facilitated simultaneously. At the end of the Proposed Development's lifespan, the panels and other infrastructure would be removed, and the land restored to its original condition. It follows that there would be no permanent loss of BMV agricultural land as a result of the Proposed Development.

Biodiversity – the Site is not designated for its biodiversity value and is primarily of limited ecological value; rather, the Site predominantly comprises of intensively farmed agricultural land albeit with mature and/or deciduous tree belts on the boundaries, broken hedgerows and occasional hedgerow trees. It is therefore considered that the Site offers significant opportunity for biodiversity enhancement, subject to the recommended mitigation measures. The Proposed Development would account for appropriate separation distances to any natural features within/outside the Site, in compliance with prevailing guidance, which includes the areas of trees covered by a TPO. For the avoidance of doubt, there are no proposals to remove trees or hedgerows. It would also seek to achieve biodiversity net gain ('BNG').

A Breeding Bird Survey Report (by Bioscan, dated November 2022) undertaken for the Site concludes that the habitats within the nearby SSSIs are not present within the Site and therefore there is no functional linkage between the Site and those environmental designations. The Survey Report concludes that while the Site does support relatively high numbers of declining farmland bird species

(i.e. corn bunting and skylark), these species are likely to be breeding at similar densities throughout equivalent farmland habitat within the vicinity of the area. Therefore, the importance of the bird assemblage is ranked at no higher than local level. Nevertheless, mitigation measures will be incorporated into any future planning application to reduce the impact on farmland birds. Any planning application would be supported by a Phase 1 Habitat Survey and any other species surveys (if any are required), along with a management and mitigation strategy (as necessary) and both an Ecological Appraisal and BNG Assessment.

Landscape and Visual Impact– the Site is not within any national or international landscape designations however is within a locally designated SLA and the 'open countryside', and is near the Cranborne Chase and West Wiltshire Downs AONB.

A Landscape and Visual Review (LVR) has been undertaken, which identifies that an LVIA is needed to assess the potential effects of a solar farm on the local (SLA) and national landscape designations (AONB). The ZTV and Viewpoints are provided at Appendix 3 to this Letter. In terms of landscape and visual impact (generally), at this stage 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, particularly as (i) there is adequate mature existing vegetation around a nearby operational 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; and (iii) when considering that a comprehensive landscaping scheme would be provided to assimilate the Proposed Development into the landscape. The latter would include green corridors along the two existing public footpaths, bolstering existing tree belts on the southern and eastern site boundaries, field boundary hedgerow improvements, and other mitigation and enhancement to minimise any impacts on intermittent close proximity views to nearby dwellings and PROW users.

The Proposed Development would be designed to respect the character of the landscape and use the strong field pattern to integrate the scheme as far as practicable. All trees and hedgerows on the Site would be retained and additional planting provided, where necessary, to fill gaps in the existing boundary planting. A landscape strategy would also be prepared with any future planning application.

The original EIA screening opinion (Ref. PL/2023/03063) stated: "*In response to the submitted screening opinion, the Council's Landscape Officer has provided the following comments:*

The development site is washed over with, the SDLP – C6 Special Landscape Area (SLA) and within the setting of Cranbourne Chase AONB. The rising topography on the sides of the River Ebble valley has the potential to offer views of the site from the AONB. The proposed solar farm will introduce new elements of built form into a rural agricultural setting and that is likely to adversely affect the visual amenity and landscape character of the area. As the site is not within the AONB I assume it is unlikely to be screened in for EIA. However given the sensitivity of the AONB and its setting and the large scale of the development I would prefer that a full Landscape and Visual Impact Assessment is undertaken. This will provide judgements on the significance of landscape and visual effects, both adverse and beneficial. It will also inform the mitigation strategy which may lead to e.g. adjustment of layout, additional landscaping. It will also assess any significant cumulative effects particularly relating to Bake Farm solar array and PROW network. Bake Farm was screened in for EIA. It is likely that this was considered necessary as the farm holding physically joined the AONB. The initial application was refused and a later application (14/10548/FUL) approved for a reduced scheme. The new proposal is almost twice as big as Bake Farm (36ha). [Underline added for emphasis].

The above comments should therefore be taken onboard by any future EIA document."

However, the overall Screening Opinion concluded that the Proposed Development was EIA development on the grounds of transport only: "*Having regard for the comments received from the Council's Highways Officer in respect of this screening opinion, it is therefore considered that the proposal would constitute EIA development which may have significant effects specifically round highway impacts by way of the proposal. Thus an EIA is required. The proposal has therefore been subject of a scoping exercise as summarised above. The applicant should therefore take on board the comments of the various consultees above in terms of the content of any future EIA related to a proposal for the identified site."* [Underline added for emphasis].

As stated previously, the 40% reduction in the RLB and developable solar panel area would not result in significant harm to the landscape character and cumulative impacts with nearby solar farms. Consequently, the Applicant considers that the landscape impacts from this latest iteration of the Proposed Development would not constitute or warrant an EIA in isolation. Notwithstanding this, the Applicant still proposes to provide a Landscape and Visual Impact Assessment (LVIA) for any forthcoming planning application, which would include a cumulative impact assessment of nearby solar farms (constructed, consented, and pending determination) in proximity to the Site, including Bake Farm. The LVIA will adopt a 3km radius study area within which any potential effects would be focussed. Further to this, the proposal will consider the landscape character of and visual impacts on the nearby Coombe Bissett and Homington villages, which are rural in character, contain conservation areas and a number of listed buildings, and on the residents within Salisbury. As such, it is considered that the proposed documentation that would be submitted with any future planning application would still include the relevant detail and scope requested by the landscape officer under Screening Ref. PL/2023/03063. This robust approach to the assessment of the Proposed Development, combined with the 40% reduction in maximum developable panel area now being proposed, should be considered as sufficient to confirm the revised proposals as non-EIA development.

Cultural heritage – the Site is not identified as having any archaeological significance and does not contain any listed buildings, Scheduled Monuments or other national and international designations/assets. There are a number Scheduled Monuments and two Conservation Areas within 2 km of the Site. It is proposed that the planning application will be accompanied by a Cultural Heritage Assessment ('CHA'). The CHA will be informed by site visits and will identify the potential for cultural heritage assets to be impacted by the proposed development of the Site. The evidence presented and the conclusions offered will provide a comprehensive basis for further discussion and for the formulation of a further mitigation strategy, should this be required. The CHA will also identify the known and likely archaeological potential of the Site and the relative value or importance of such a resource / asset which will then be set out in accordance with a range between the scales of High, Medium, Low and Uncertain. A geophysical survey covering the entirety of the footprint of the proposed solar array will also be undertaken in order 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.

Amenity (noise)– there are scattered residential properties in the immediate area (200 to 700 m from the Site) with the closest being located at Pigeon Hill, Homington House and Wellhouse Farm, as well as the Bake Farm Salisbury Campsite. Homington and Coombe Bissett settlements are also within 1 km of the Site and are physically separated from the Site either by major road networks (A354) or natural features (Homington Downs SLA).

The Proposed Development would be passive in operation and therefore would not generate any significant operational noise, other than that associated with occasional visits by maintenance/service vehicles. Inverters and batteries would be sited away from the site boundaries to reduce the noise levels to ambient levels at the perimeter. The noise associated with such activities would be negligible and less than that associated with farming activities in the area.

There will be some temporary noise during the construction phase, which is anticipated to last approximately 20 weeks. This would include the following activities: vehicle movements along access tracks and haulage routes associated with the delivery and removal of construction materials; equipment delivery; site and ground preparation activities; erection of panels using construction machinery; and material hauling. The construction activities may increase noise levels within the vicinity of the Site; however, it is considered that noise impacts during construction would be intermittent, localised and temporary in nature.

Any planning application would include a Noise Assessment to consider the impacts on, and formulate mitigation measures to, nearby sensitive receptors during operation and construction.

Amenity (visual) – the LVR notes there may be intermittent close proximity views from scattered and dispersed dwellings near the Site. Although the solar array and associated buildings and infrastructure may be visible from neighbouring properties, the LVR concludes that the impact would not be significant due to the limited height of the Proposed Development and the visual containment of the Site afforded by existing vegetation, some of which is protected under a TPO. The Proposed Development would be sensitively designed and incorporate appropriate mitigate where possible to minimise any impact on the amenities of these properties. Furthermore, the solar panels would be coated to maximise daylight absorption and thus minimise glare potential. A Glint and Glare Assessment (by Pager Power), which considered the initial 69.0ha site area, concludes that there would be no impact to road, residential and aviation receptors and therefore no mitigation is required. The extent of impact of the 40% reduction in developed panel area would not materially alter this assessment. This document would form part of any future planning application.

Flood Risk and Drainage– the Site is located entirely within Flood Zone 1, the area at lowest risk of flooding. Due to the size of the Site being in excess of 1 ha, any forthcoming planning application will be accompanied by a Flood Risk Assessment and Drainage Strategy.

Traffic and Transport– the Site benefits from access via an existing farm entrance / private road off Homington Road, which already accommodates agricultural and large vehicles. It is therefore possible to access the Site. Therefore, this Site may accommodate HGV access, subject to a future Transport Report to determine whether any improvements (such as localised widening) are needed. Traffic associated with the Proposed Development would be largely limited to the temporary construction phase, during which appropriate and proportionate management measures would be implemented. Traffic during operation would be limited to periodic maintenance/inspection. Screening Ref. PL/2023/03063 concluded that the Proposed Development was EIA development on the grounds of:

Whilst there is no reason to believe the long-term transport effects of this proposal are such that an EIA is needed, the construction traffic will be accessing the site via Homington Road which is rural in nature and generally of restricted width with grass verges that are likely to be overrun. Due to the likely size and frequency of the construction vehicles on Homington Road the environmental impact may need to be further assessed by an EIA.

Based on the comments received from the WC Highways Officer, it is evident that the cumulative impact of construction vehicles associated with the proposal are likely to have an environmental impact on Homington Road and the surrounding infrastructure. Concerns have also been raised by way of this proposal in the pre-application enquiry (ref: ENQ/2023/00231) that require additional information to assess the impact of this scheme in the form of a Transport Statement

The above comments should therefore be taken onboard by any future EIA document.

Following this decision, the 40% reduction in site area will result in much reduced HGV numbers and frequency during the 18 week construction period from 27-28 HGVs per week (Screening Reference

PL/2023/03603) to 17-18 HGVs per week[1]. The access point is relocated northward on Homington Road, being approximately 558m south of the A354 junction rather than 1.15km south as per the Original Proposal. This reduces the length of vehicles travelling along Homington Road by approximately 51% or 592m. The reduction in HGV movements and length travelled along Homington Road will reduce the environmental impact on Homington Road and surrounding infrastructure.

The planning application would be accompanied by a Transport Statement and Construction Traffic Management Plan (CTMP) which will cover the same scope and level of detail required of an EIA, and therefore when taken in view of the scale of reduction made to the revised proposals, it should not be considered EIA Development on transport grounds.

Cumulative Effects – a search of satellite imagery identified one existing solar farm (Bake Farm Solar Farm) located 0.45km north of the Site, and directly north of the A354[2]. The LVR concludes that the presence of the nearby Bake Solar Farm would not result in significant adverse cumulative effects given the existing mature vegetation which surrounds the existing nearby solar farm and the Site. Furthermore, a review of the Council's planning register did not identify any developments of other types which may result in significant cumulative effects within 5km of the Site. Due to the distance between the Proposed Development and the other existing and proposed solar farms, the physical barriers between them and the reduction in site area and therefore developable area, it is therefore considered that the Proposed Development would not result in significant cumulative effects, such that EIA is required. However, as mentioned previously, the LVIA submitted with any future planning application would take a robust approach and include a cumulative impact assessment with nearby solar farms that have been constructed, consented and are within the planning system.

In view of the characteristics of the Proposed Development, the relatively low environmental sensitivity of the location and the limited potential for impacts, it is considered that the proposed solar farm would not result in significant environmental effects that require an EIA to be undertaken.

SUMMARY AND CONCLUSIONS

The Proposed Development involves the generation of renewable energy. It would make a positive contribution towards reducing carbon emissions and also contribute to supporting the local community and economy.

The Site is not environmentally sensitive nor subject to any local, national or international environmental or cultural heritage designations, however, is within a local landscape designation: Special Landscape Area. It would not involve complex or potentially hazardous environmental effects.

The Applicant has made considerable reductions to the proposed site area, which in turn will result in significantly lower HGV movements and a much reduced solar panel area. Notwithstanding this, the Applicant still intends to robustly assess the impact of the revised proposals in any forthcoming planning application through the inclusion of an LVIA, cumulative impact assessment and Transport Statement/CTMP. The Proposed Development (as revised)therefore, in our view, does not represent EIA development.

We look forward to hearing from you soon.

[1] Calculations assume that the shipping containers are delivered by 1 HGV per week over the 18 week construction period. Alternatively, these could be delivered at a rate of 3 HGVs per day for a total of a w 4 week period.

[2] Approved Bake Solar Farm reference 14/10548/FUL

Yours sincerely,



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Encs:

Appendix 1: Site Location Plan
Appendix 2: Maps
- Proposals Map Extract
- Magic Map Extract – Environment and Heritage
- HER map
- Environment Agency Flood Risk Map
- Public Rights of Way Map

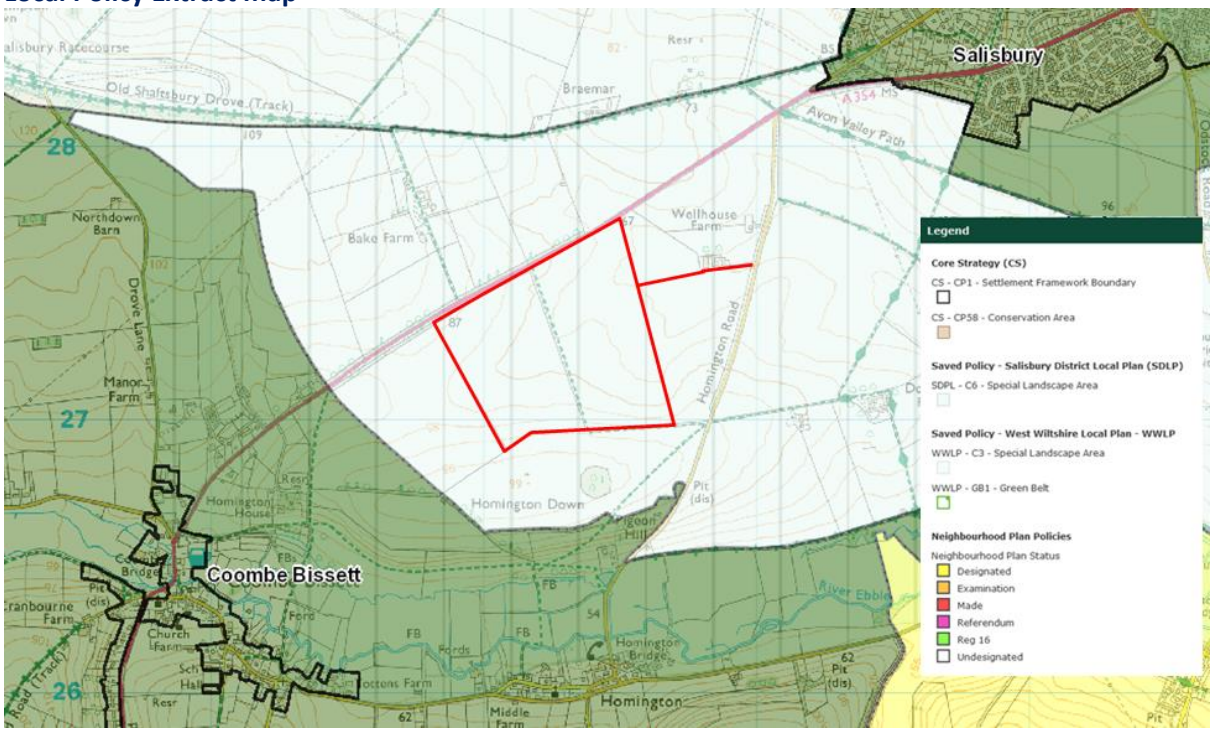
Appendix 3: ZTV and Viewpoints

APPENDIX 1 – RED LINE SITE PLAN

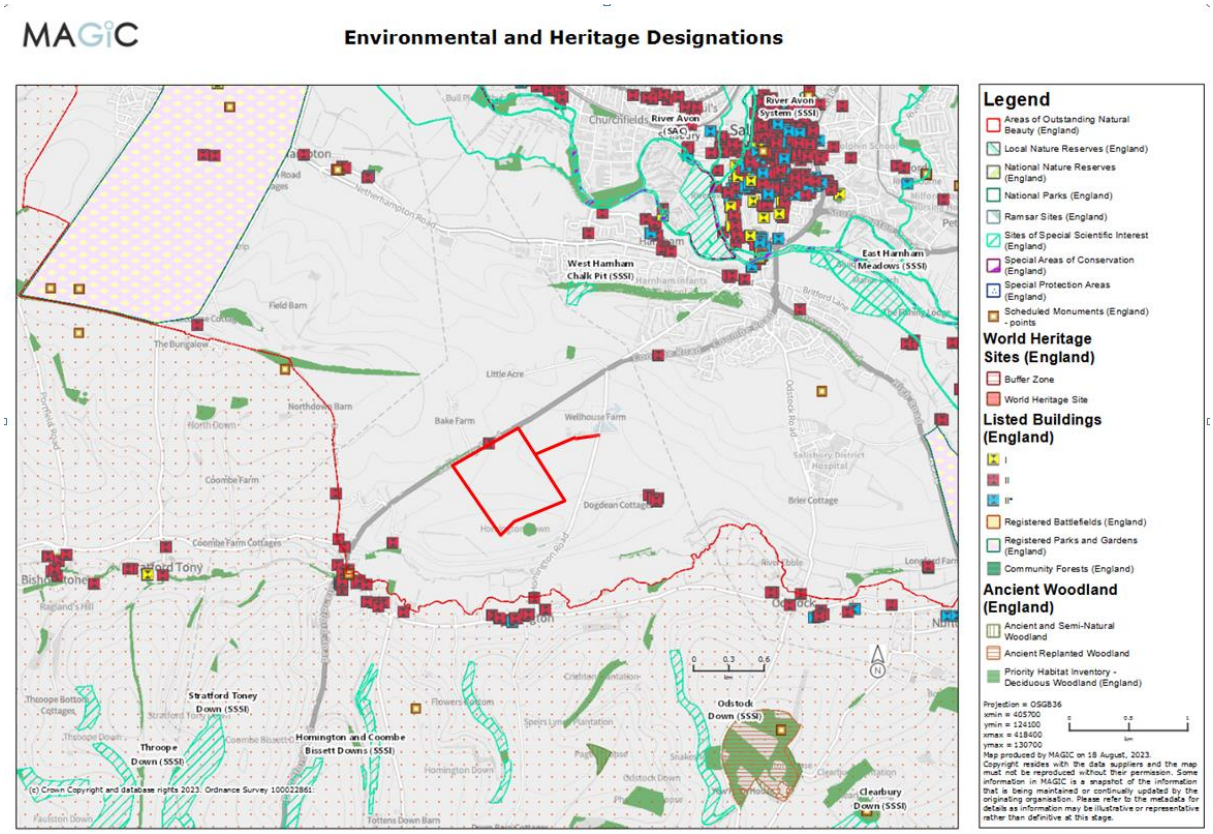


APPENDIX 2 – MAPS

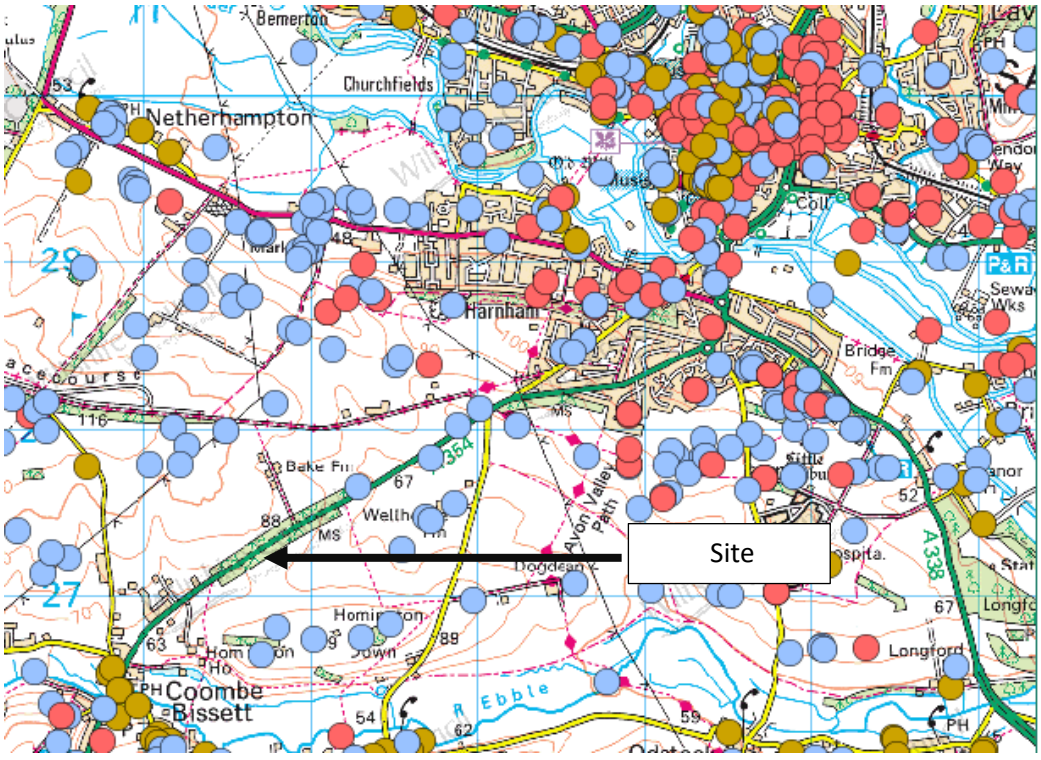
Local Policy Extract map



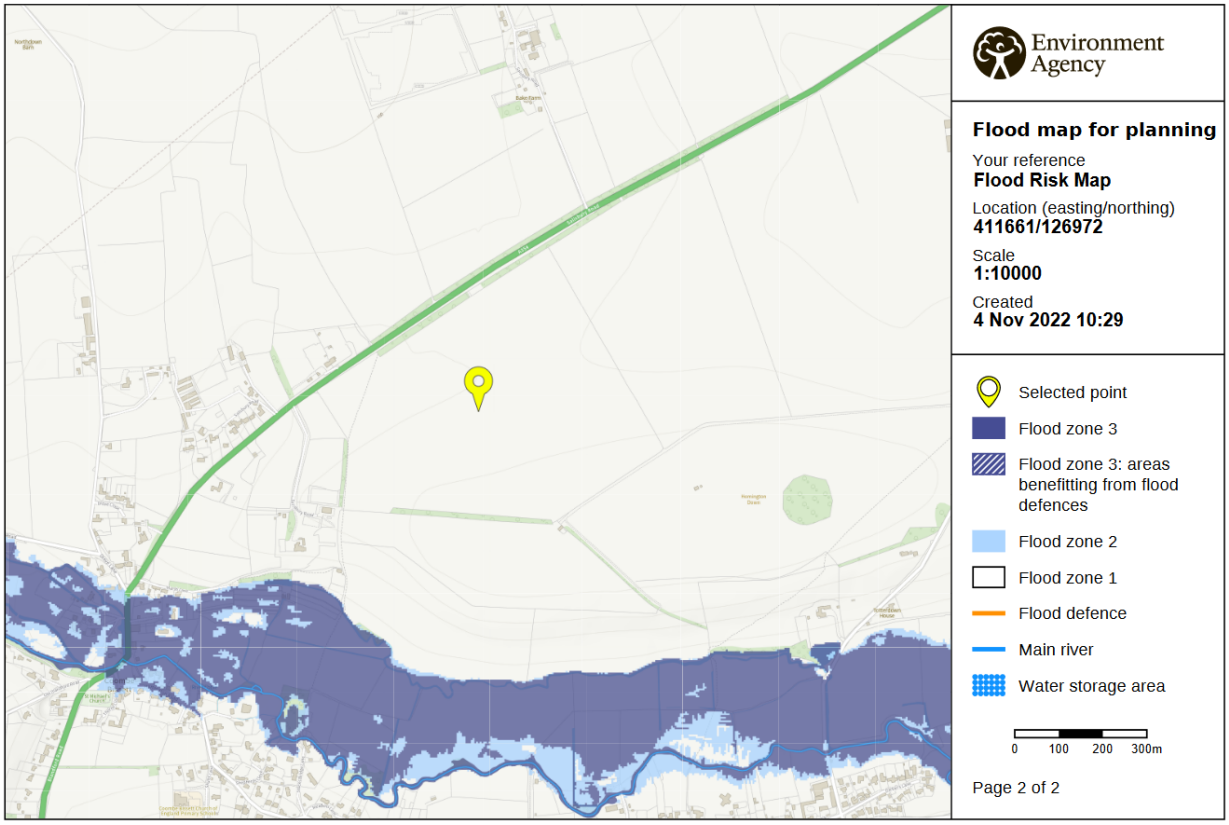
MAGIC Map Extract - Environmental and Heritage Designations



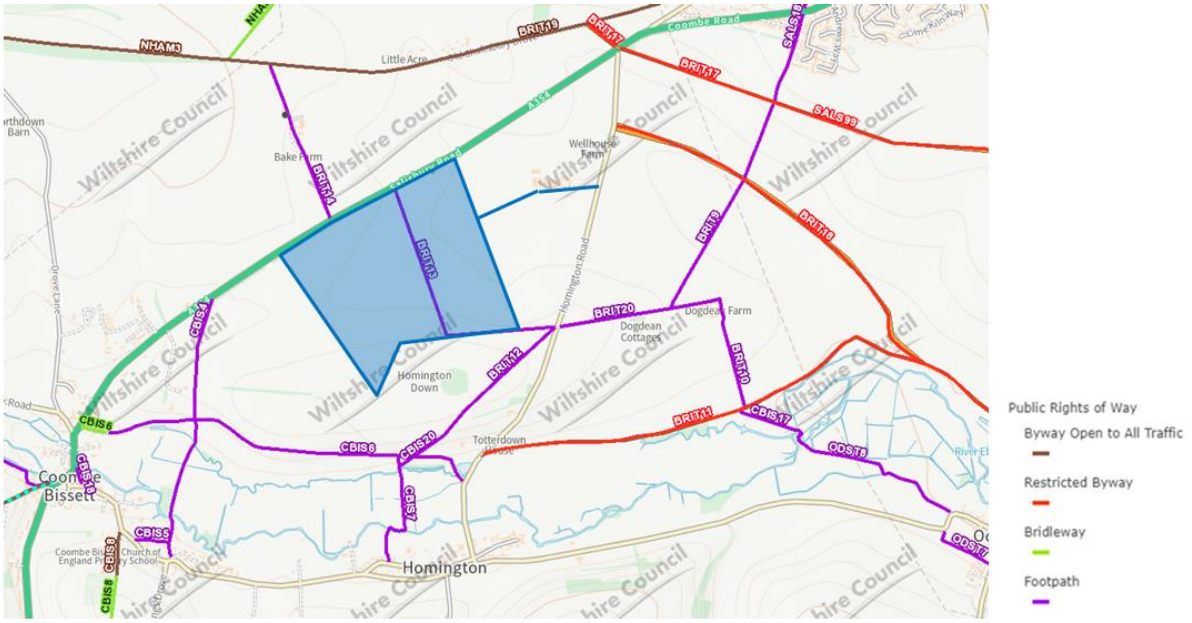
Wiltshire HER Map Extract



Flood Risk for Planning Map Extract



Wiltshire PROW Map Extract



APPENDIX 3 – ZTV AND VIEWPOINTS

Project:

Salisbury Solar Farm

Viento Environmental

Key:

- Approximate application boundary
- Locational marker within proposed development
- Cranborne Chase AONB

Theoretical visibility of Salisbury Solar Farm:

- 1 locational marker visible
- 2 locational markers visible
- 3 locational markers visible
- 4 locational markers visible
- 5 locational markers visible

Locational marker points:

- A 411440, 127040 +3.0m AGL
- B 411800, 126760 +3.0m AGL
- C 411900, 127080 +3.0m AGL
- D 412325, 127570 +3.0m AGL
- E 412580, 127010 +3.0m AGL

1 Outline LVIA Viewpoints

Notes:

1. ZTV, generated 3rd December 2021.
2. Predicted visibility is for observer eye level 2m above ground level.
3. The analysis does not take into account the screening effects of vegetation, buildings or other surface features.
4. Created using Ordnance Survey digital 5m terrain data.
5. Reproduced from Ordnance Survey digital map data © Crown copyright 2022. All rights reserved. Licence number 100053544.

Scale: 1:25,000 @A3

0 500m 1km

N

Figure LV1
3km Radius ZTV

Drawn by: BJD
Checked by:
Date: 11-08-22

Vp	Site ref	Name	NGR		Distance to site	LCA	Landscape Designation	Receptor	Notes
1	A	Footpath adjacent to A354	412190	127565	0.05km	B2 - Ebble Broad Chalk River Valley Slopes	None	Walkers, Motorists	
2	S	Coombe Bissett Tennis Club	411225	125885	0.9km	C2 - Ebble Broad Chalk River Valley Floor	Cranborne Chase AONB	Residents, Recreational users	
3	L	Footpath on southern edge of Salisbury	413780	128150	1.4km	D8 - Netherhampton Chalk Downland	None	Walkers, Residents	
4	R	Old Blandford Road byway	410165	125765	1.5km	B2 - Ebble Broad Chalk River Valley Slopes	Cranborne Chase AONB	Walkers, Horse riders, Cyclists	
5	Q	Local road north of Stratford Tony	409255	127760	2.2km	B2 - Ebble Broad Chalk River Valley Slopes	Cranborne Chase AONB	Motorists	