Wiltshire Council

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26th September 2023

Application No:	**PL/2023/07678**
Proposal	**Request for and EIA Screening Scoping Opinion for a proposed Solar Photovoltaic Farm, Battery Storage and Associated Infrastructure**
Site Address	**Land south of Salisbury Road, Near Homington, Wiltshire, SP5 4JT**

Dear Mr Booth,

Thank you for your EIA screening and scoping request application registered on the 8th September 2023. In response to your enquiry I hope that you will find the following information helpful.

Please note that this advice represents officers' informal opinion based upon the information you have provided. It is given without prejudice to any decision the Council may make on any subsequent formal planning application. A planning application will be the subject of publicity and consultation in accordance with the Council's procedures. These and other matters which may subsequently come to light, may result in additional issues being raised that are pertinent to the determination of the application.

Judgement – An EIA is not required

Site/Planning History Context

The site subject to this pre-application enquiry comprises of two agricultural fields on land situated 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. The total site area covers an area of approximately 41 hectares. The area of land has been significantly reduced following the previous EIA Screening Request Opinion (PL/2023/03063) that confirmed the original proposal for an area approximately 69 hectares in size would constitute EIA development on the grounds of potential transport impacts during construction.

The 41 hectare 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 of the site is the designated Tree Preservation Order referenced as S/BRIT/TPO1. The site is within the catchment of the River Avon SAC, and is within 13.8 kilometres of the 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 map extract below shows the site and its context. The yellow line shows the context of the site and access subject to screening request PL/2023/03063. The red line shows the context of the site and amended access for the purpose of this screening request.



Proposed Development

The submitted EIA screening and scoping opinion is not accompanied with any detailed plans or a masterplan but describes the details of the proposed scheme as thus:

- The proposed development would consist of row of solar photovoltaic ('PV') panels; inverters and batteries within shipping containers (or similar); two 11kVA connections and one substation; internal access tracks; perimeter fencing and CCTV cameras.
- The solar panels would be laid out in rows running from east to west across the site with an approximate gap of between 3 to 4 metres in rows. The panels would be mounted on a frame, installed using spiked foundations at a depth 1 to 2 metres.
- The panels would be mounted in four horizontal rows with one row fixed directly above the other and angled. At the lowest edge, the arrays would be 0.9 metres from the ground and at the highest edge, 3 metres from the ground.
- The inverters and batteries would be within containerised units similar to shipping containers with each unit measuring approximately 12 metres in length by 2.6 meters wide by 2.9 metres high. Each unit would be site on a concrete base.
- The dimensions of the proposed substation would be 6 metres long by 2.7 metres wide and 3 metres high and sited on a concrete base with the structure clad in brick or wood.
- Access to the site is proposed via a private road/farm entrance off Homington Road with that can already accommodate agriculture and large vehicles thus being suitable for HGVs.
- To secure the site, deer fencing (mesh fencing with wooden posts) approximately 2metres in height is to be installed around the perimeter of the site incorporating access gates for maintenance.
- CCTV cameras mounted on poles approximately 4 metres in height are proposed to be installed within the site

RELEVANT LEGISLATION:

Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regs) The aim of the EIA Regs is to ensure that major projects that are clearly likely to have impacts on the environment are subject to an EIA so that these impacts are fully assessed and understood before planning permission is granted. Development proposals of varying types are categorised in the EIA Regs as either Schedule 1 or Schedule 2 development, depending upon the nature and scale of the development.

Development proposals within the former category must always be subject to an EIA, while those within the latter category must be subject to a determination as to whether the proposals are likely to have significant effects on the environment where one of the threshold criteria is exceeded. In addition, if development falls within Schedule 2 but is within a sensitive location, even if the minimum criteria is not met, a screening opinion is still required to decide whether the proposal is likely to have significant environmental impacts and therefore if an EIA would be required. The first stage of the screening process is therefore to determine whether the development proposals are listed under Schedule 1 or Schedule 2 of the EIA Regs.

EIA ASSESSMENT:

Is the Development Proposal Listed Under Schedule 1?

In this instance, the development proposals are not listed under Schedule 1 of the EIA Regs and therefore there is no *mandatory* requirement for any such application to be supported by an EIA.

Is the Development Proposal Listed Under Schedule 2?

The proposals are considered to constitute Energy Industry and thus fall within Paragraph 3 (a) of Schedule 2 - '*Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1*)' and therefore constitutes Schedule 2 development. Further assessment is therefore required in order to determine whether an EIA is required.

Does the Proposed Development Fall Below the Applicable Thresholds?

In circumstances when it is established that a development proposal is listed under Schedule 2, it is also necessary to assess whether the development falls below the thresholds identified for that particular type of development. Those developments that are under the applicable threshold probably do not require an EIA, but where the development exceeds the applicable threshold it is necessary to assess whether it is likely to have significant effects on the environment and/or any sensitive receptors.

The EIA Regs define the applicable threshold for development that falls within this Schedule 2 development under paragraph 3(a) (*Industrial installations for the production of electricity, steam and hot water)* as involving an area of land exceeding 0.5 hectares in size. In this instance, the site area is approximately 69 hectares in size and therefore continues to constitute large scale development exceeding the applicable threshold identified in Schedule 2. Further consideration against Schedule 3 of the EIA Regs is therefore necessary to determine whether the proposal comprises EIA development

Is the Development Located within a 'Sensitive Area'?

As is identified above, development listed under Schedule 2 may be subject to an EIA depending on whether it is likely to have significant effects on the environment by virtue of factors such as its size, nature or location. Where development is listed under Schedule 2, as is the case in this instance, an EIA is more likely to be required if the site is located within a 'sensitive area' or the size of the development exceeds the applicable threshold such that the development may result in significant environmental effects.

In the case of Schedule 2 development, the relationship between a proposed development and its location is a crucial consideration and the location of the proposed development must therefore be examined to determine whether it constitutes a 'sensitive area'. 'Sensitive areas' are defined in the EIA Regs and include:

- Sites of Special Scientific Interest (SSSI's) and any consultation areas around them;
- National Parks;
- World Heritage Sites (WHS);
- Scheduled Ancient Monuments (SAM);
- Areas of Outstanding Natural Beauty (AONB);
- Potential or classified Special Protection Areas (SPAs); and
- Candidate or designated Special Areas of Conservation (SACs).

In this instance, whilst the site is not situated within the AONB, at its closest point, this being on the southern boundary of the site, the site is, approximately 0.69km from the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB).The site is also within the 13.8km of the New Forest which is designated as a SAC, Special Protection Area (SPA) and RAMSAR site). It is therefore considered that the site is located within an area with a number of sensitive receptors and therefore could have a significant effect of a sensitive area.

Consultation has been undertaken with a number of relevant consultees, and the following sections cover the matters raised.

Landscape Impact, Trees and Public Rights of Way

The submitted covering letter accompanying this screening opinion request states the following:

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.

In respect of land use and agricultural land quality, the covering letter states:

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.

In response to the submitted screening opinion, the Council's Landscape Officer has provided the following comments:

I note that this application is for a revised smaller scheme, however it is also a very different scheme with the inclusion of the battery storage. This will introduce additional industrial elements into the rural landscape, where currently there are none. The placement of these units should be carefully considered, with mitigation to aid assimilation as required. All industrial elements should be finished in the same colour to help unify the proposal. Guidance on colours can be found on the CC AONB website.

I welcome the fact that the applicant has agreed to submit a full Landscape and Visual Impact Assessment with any subsequent application. I cannot comment on the ZTV as it is for the previous iteration of the scheme and therefore incorrect for the new proposal. I am happy to agree a 3km search area. Viewpoints outside the AONB are likely to be within the SLA which is a local designation, this should be reflected in the view point table.

The additional following viewpoints should be ground-truthed:

- *Old Blandford Road (Track) PROW CBIS1 lies to the SW of the site and may offer oblique views from the AONB. NB I see that this has been included*
- *Homington Road to the east of the site by the junction to Dog Dean Farm where PROWs BRIT12, BRIT13 & BRIT20 meet;*
- *In the vicinity of the junction between PROWs CBIS4 and CBIS6 south west of the site near Homington House. NB probably less likely with the reduced scheme but CBIS4 may have views of the development across the field.*

In light of the comments detailed above from the Landscape Officer, any Landscape and Visual Impact Assessment to accompany the submission of any formal planning application should also include viewpoints to the east of the site from Pepperbox Rise/A36 public highway. Within this assessment of the viewpoints, the existing solar farm at Bake Farm should also be considered and any accumulative impacts this may have coupled with the proposal. Also please note in the comments of the Landscape Officer the issue advised around the submitted ZTV with this screening opinion.

Trees

To the north of the site is the designated Tree Preservation Order referenced as S/BRIT/TPO1. The Council's Tree Officer has advised that the submission of any application for a scheme of this nature should be accompanied by a Tree Survey and an Arbroicultural Impact Assessment to ensure the belt of protected trees are adequately protected and not negatively impacted by this proposal.

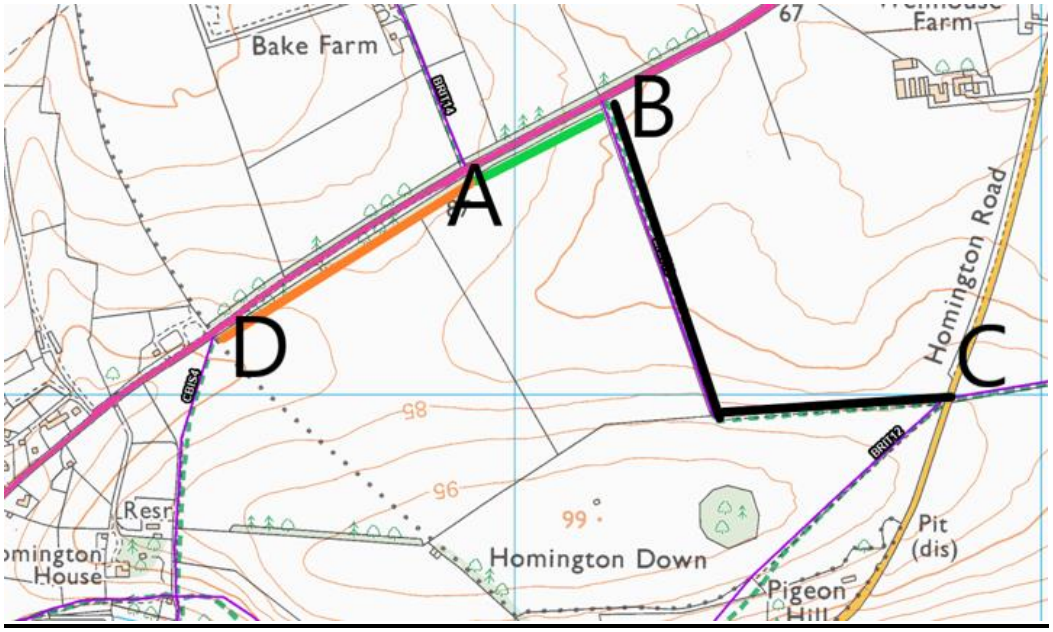
Public Rights of Way

Comments to this screening opinion proposal from the Council's Public Rights of Way Officer are detailed as below:

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 taken into the developed area. For this reason I would be very grateful if the applicant would dedicate a link from BRIT14 (A-B on plan below shown in green) and the whole length of BRIT13 (B-C on below plan shown in black) 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 (A-D on attached plan shown in orange) 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.



Ecology and Phosphate impacts

In respect of the above, the submitted covering letter accompanying this screening opinion request states the following:

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.

The Council's Ecology officer has confirmed the following:

Recommendations

In terms of potential Wildlife and Biodiversity impacts, I do not consider the proposed development would constitute EIA Development under the current application parameters seeking a screening opinion from the LPA for a Schedule 2 (3)(a) development.

Background

An EIA Screening Opinion request has been submitted by DWD Property and Planning (letter 7th September 2023. Ref. 16364) on behalf of Low Carbon UK Solar Investment Company Ltd in relation to proposals for the installation of a solar photovoltaic farm, battery storage and associated infrastructure on approximately 41ha of agricultural land to the south of Salisbury Road, Homington.

An EIA Screening Opinion request was submitted to Wiltshire Council in April 2023 for a similar scheme in the same location but on a larger site, approximately 69ha. An EIA Screening Opinion was issued by Wiltshire Council in May 2023 which advised that EIA would be required for the scheme due to the potential transport and landscape and visual impacts.

The proposed development would comprise:

- *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; 6*
- *internal access tracks;*
- *perimeter fence; and*
- *CCTV cameras.*

It is proposed that the site would be retained in agricultural use for the life time of the development with the majority of the site planted with a combination of grassland/meadow which would allow sheep grazing under the panels.

The following key landscaping proposals have been set out:

- *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.*

The proposed site is described as agricultural land separated into two interconnecting parcels partly bound by a mixture of deciduous tree belts and some broken hedgerows and occasional trees. An Agricultural Land Classification (ALC) survey has confirmed the site is a mixture of Grade 3a Best and Most Versatile agricultural land and Grade 3b Moderate Quality agricultural land. The site is bound to the north by the A354 (Salisbury Road) and by agricultural land to the east, south and west. A public right of way (BRIT13) runs through the eastern portion of the site in a broadly north to south direction.

The Screening Request letter states that the site offers significant opportunity for biodiversity enhancement and that the development would seek to achieve biodiversity net gain (BNG).

As stated in the screening opinion request (DWD Property and Planning. Letter 7th September 2023. Ref: 16364) I agree that the proposed development falls under Schedule 2 (3)(a) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and that it is appropriate to screen the proposal with the LPA to clarify if potential significant environmental effects are likely to arise from the proposal which constitutes EIA development.

A review of information available at Wiltshire Council confirms the Site and immediately adjacent land is not covered by any statutory nature conservation designations and aerial photography indicates the land affected comprises arable fields bound by linear features (hedges or mature trees).

As such it is considered that the information submitted in relation to the location and characteristics of the site, description of the proposed development is sufficient to allow the LPA to formally consider the screening request.

Comments and Justification

Sensitive Sites

The land is not covered by any wildlife designation however there are several protected sites (designated under the Wildlife & Countryside Act 1981 (as amended) and or The Conservation of Habitats and Species Regulations (2017) and therefore 'sensitive areas' under the intended meaning in the EIA Regulations) within 5km:

- *River Avon SAC approximately 2km to the north east of the site;*
- *Great Yews SAC approximately 3.5km to the south of the site;*
- *West Harnham Chalk Pit SSSI approximately 1km to the north east of the site;*
- *Homington and Coombe Bissett Downs SSSI approximately 1.2km to the south of the site;*
- *Odstock Down SSSI approximately 1.6km to the south east of the site;*
- *River Avon System SSSI approximately 2km to the north east of the site;*
- *East Harnham Meadows SSSI approximately 2.8km to the north east of the site;*
- *Stratford Toney Down SSSI approximately 2.9km to the south west of the site;*
- *Clearbury Down SSSI approximately 3.4km to the south east of the site;*
- *Great Yews SSSI approximately 3.5km to the south of the site;*
- *Britford Water Meadows SSSI approximately 3.5km to the east of the site;*
- *Throope Down SSSI approximately 3.7km to the south east of the site;*
- *Knighton Downs and Wood SSSI approximately 4.6km to the south east of the site.*

Although the site does not lie within a sensitive area as set out in the EIA Regulations, it is located within zones of influence (ZoI) associated with the River Avon SAC and the New Forest SPA/SAC. The site is also located within a SSSI impact risk zone, however consultation with Natural England is not required for solar farm applications within this zone.

The site is located within the catchment of the River Avon SAC therefore an application would trigger a HRA for potential significant effects associated with phosphorus elevations on this designated site. As a solar farm does not require phosphorus inputs, increases in phosphorus inputs are considered extremely unlikely and significant impacts on the SAC are not predicted at this stage.

The site is located within the 13.8km ZoI for recreational pressure around the New Forest SPA/SAC therefore the proposals would trigger the need for HRA, however, the proposals set out above are unlikely to increase recreational pressure on the SPA/SAC. It is therefore considered unlikely that the proposals would have a significant impact as a result of increased recreational pressure on the New Forest SPA/SAC.

The following County Wildlife Sites (CWS) are located within 1km of the site:

- *Homington Down CWS approximately 352m to the south of the site; and*
- *The River Ebble CWS approximately 709m to the south of the site;*
- *Sidehams CWS approximately 854m to the south east of the site.*

Important Habitats

A habitat survey has not been submitted but the screening opinion request letter describes the site as intensively farmed agricultural land with mature and or deciduous tree belts on the boundaries with broken hedgerows and occasional hedgerow trees. The tree belt along the northern boundary of the site is subject to a Tree Preservation Order (TPO).

A Phase 1 walkover survey, an arboricultural survey and impact assessment are proposed to confirm the ecological and tree constraints on and nearby the site. Mitigation for trees and priority habitats (e.g. appropriate buffers) will inform the planning application.

Aerial photography and Ordnance Survey mapping strongly indicate the land is under agricultural management with hedges and trees along field boundaries.

Hedges are Natural England Priority Habitats, of high biodiversity value and are likely to support protected and notable species. Hedges are also recognised for their function as important corridors essential for species movement and maintenance of population status.

Records indicate that there are no other known areas of priority habitat (listed under Section 41 of the NERC Act 2006) within the site or adjacent to the site boundary. There are several areas of priority habitat within 1km of the site including:

- *Deciduous woodland;*
- *Running water;*

- *Lowland calcareous grassland;*
- *Coastal and floodplain grazing marsh;*
- *Broadleaved, yew and mixed woodland; and*
- *Neutral grassland.*

Protected or Notable Species or flora/fauna

Information regarding protected or notable species has not been submitted but it is likely that the site supports flora and fauna typical of agricultural, hedge and tree habitats. There is a barn owl record on the boundary of the site and there are records of bats, water voles, badgers, grass snakes, barn owls and slow worms within the surrounding area.

A breeding bird survey was undertaken in 2022 which recorded relatively high numbers of farmland bird species including corn bunting and skylark.

Conclusion:

While the proposed development has the potential to generate some localised biodiversity effects, it is not considered that these are likely to be 'significant' harmful effects under the intended meaning of the word 'significant' in the EIA Regulations 2017 for biodiversity. Specifically, the land is not covered by any wildlife designation or within any consultation zones and therefore 'sensitive areas' under the intended meaning in the EIA Regulations are unlikely to be affected by the proposals.

Despite the recommendation that the above development proposal is unlikely to require a subsequent planning application to be accompanied by a full Environmental Statement (ES) and is not considered to constitute EIA Development, the applicant and Local Planning Authority should not misinterpret this advice and recommendation to mean that a development proposal of this scale and nature would be considered to be acceptable in principle at this early stage.

The EIA Screening Opinion request letter states that an Ecological Appraisal would accompany the planning application, however this is not considered sufficient to fully assess the potential ecological impacts associated with the proposed development. Any future planning application must be accompanied by a full Ecological Impact Assessment (EcIA)[1] and fully comply to relevant National and

[1] The Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018).

Core Policy. To conform with current policy (NPPF and Core Policy 50) the development must demonstrate no net loss of functional habitat for biodiversity and must provide biodiversity net gain (BNG). The strategy for provision of both no net loss and BNG could be secured through provision of a Landscape and Ecological Management Plan, submitted with any future planning application and accompanied by calculations using the current version of the Biodiversity Metric.

As the site is located within the catchment of the River Avon SAC and the 13.8km ZoI for recreational pressure around the New Forest SPA/SAC the proposals trigger a HRA and NE will be consulted.

Further information can be found here: https://www.wiltshire.gov.uk/planning-bio-development

Transport/Traffic Impacts

The submitted covering letter accompanying this screening opinion request in respect of the above states the following:

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.

The Council's Highways officer has confirmed the following:

I refer to the request for an Environmental Impact Assessment Screening Opinion for a solar photovoltaic farm to be located off Homington Road and served by an existing farm access track. This is an update to a previous Screening Opinion request ref: PL/2023/03063 where the impact of construction vehicles on the road verges was considered to be potentially significant enough to warrant a further assessment by an EIA.

I note that the proposed development has been reduced in scale by approximately 40% and, as a consequence, the number and frequency of HGV movements during the construction process will decrease, although actual numbers are unknown at this stage. Furthermore, the access point has been amended to an existing farm entrance located approximately 550 metres south of the A354 junction. Whilst the proposal will still result in additional vehicles on the most northerly section of Homington Road, the impact will be less significant and potential instances of vehicles (HGVs) meeting on Homington Road will be reduced compared to the former scheme. It is considered that a further EIA assessment is not needed for the transport and highways implications of this proposal.

The supporting letter states that the applicant intends to robustly assess the impact of the revised proposal in a forthcoming planning application submission. The outcome of any detailed Transport Assessment may result in a need for localised widening or passing bays on the affected areas of Homington Road, and /or a tight scheduling of HGV deliveries to prevent the need to pass on Homington Road. A Construction Method Statement / Management Statement will be necessary together with a pre-condition photo survey of the verges.

Cultural Heritage including Conservation and Archaeology

The submitted covering letter accompanying this screening opinion request in respect of the above states the following:

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.

The Council's Conservation Officer has confirmed the following:

As the applicant notes, there are no listed buildings on or in the vicinity of the site. There are two designated conservation areas within 2km of the revised site boundaries but, in view of the topography of the site and the proposed scale and massing of the proposed structures, I do not consider they would have an impact on the setting of these CAs.

The Council's Archaeology Team have confirmed the following:

The applicant has previously recognised that the archaeological heritage will be a significant factor in considering the future development of this site as a solar farm. Even though the scheme area has now been significantly reduced, the red line boundary still encompasses c. 41 hectares of chalk downland that has never been subject to any significant development. The site should therefore be subject to appropriate archaeological assessment and evaluation so that the effects of the proposal on the archaeological heritage are fully understood at an early stage. It is noted that the applicant's preference will be to avoid direct impacts on significant buried remains wherever possible by avoiding development

on these areas. The Archaeology Service has been in contact with the applicant's archaeological consultant and a programme of archaeological evaluation is in progress, the results of which will inform any future detailed proposal for this site, whether through an Environmental Impact Assessment or a full planning application.

Drainage/flooding impacts

In regard to the above, the following information is provided:

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

In response to the submitted screening opinion, the Council's Drainage Team has provided the following comments:

We note that the above referenced application is for a reduced scheme compared to the previously submitted PL/2023/03063, which we responded with the below:

After reviewing the submitted documentation, I am of the opinion that there is nothing particularly complex / novel in relation to surface water management / drainage / flood risk. I would suggest that we can consider all potential issues as part of the usual planning submissions (i.e. Flood Risk Assessment, Drainage Strategy, and all supporting hydraulic modelling / calculations), and that in our opinion a separate EIA to address these issues will not be required.

We do not believe there has been an increase in complexity / novelty of the revised scheme in respect to safely managing surface water / flood risk. As such we would maintain our previous position that from a drainage perspective we would not see a need for a separate EIA.

Conclusions – An EIA is not required

Officers note that the size of the proposed solar farm site has been reduced to approximately 41 hectares, a significant reduction to that of the site subject to screening opinion PL/2023/03063. Having regard to the nature and reduced scale of the proposal and the detailed comments received from consultees, it is considered that the characteristic of potential impacts are not so complex or significant so as to demand that an EIA is undertaken.

Whilst the proposal will undoubtably have some environmental effects, it is considered that these are unlikely to be significant within the meaning of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, it is the Council's opinion that an **EIA is not required** for the proposed development.

I hope the above is of assistance. It is recommended that any future application scheme and its masterplan should be discussed with the local community prior to submission of the application if this has not already been done.

Please note, the above Screening and Scoping opinion does not represent the Local Planning Authority's views on the acceptability of the merits of any future development scheme.

Yours sincerely

Joe Richardson
Senior Planning Officer
]Wiltshire Council