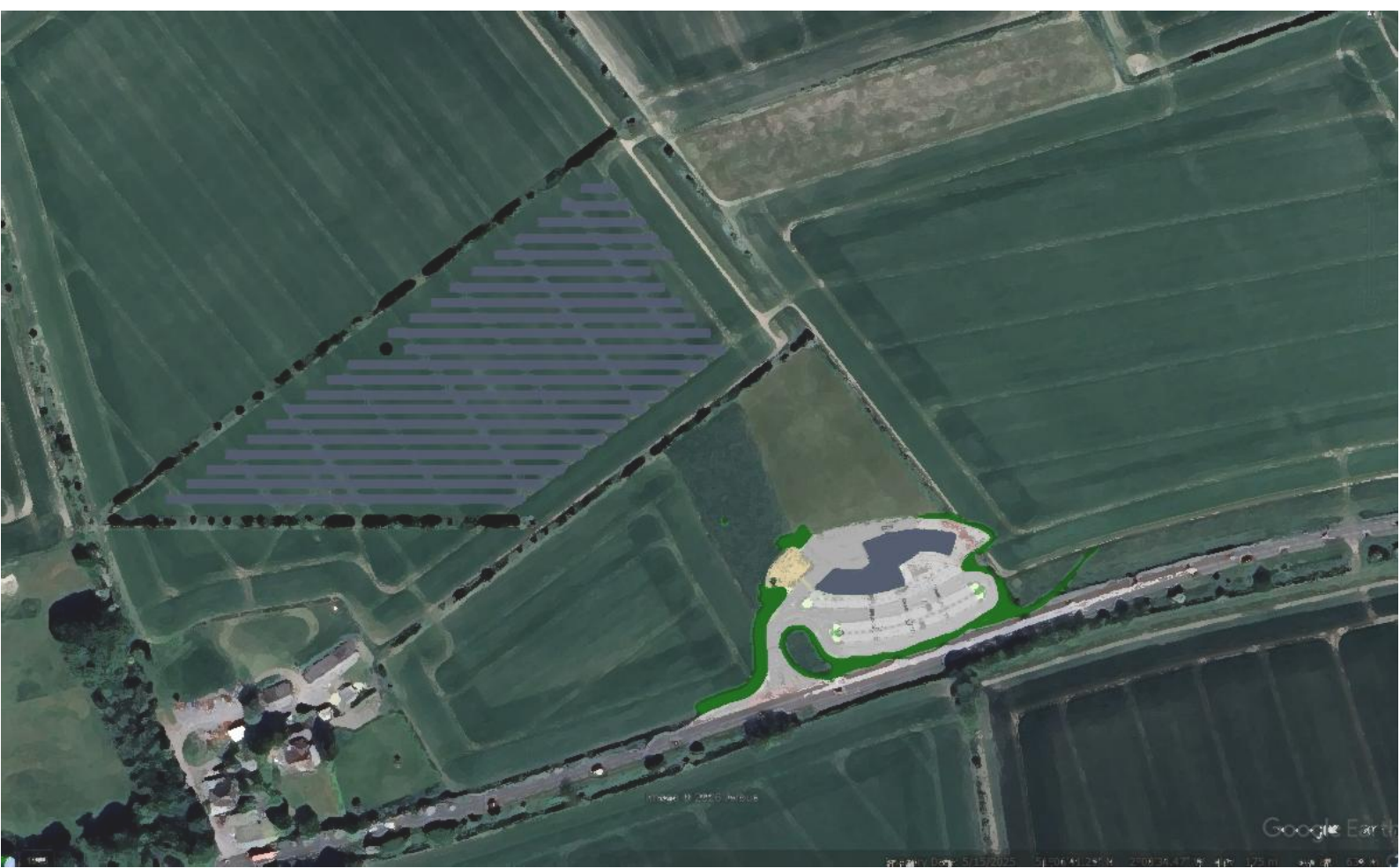


Planning, Design and Access Statement

for a

Ground Mounted Solar Array – Supporting the **INSTAVOLT** EV Hub



January 2026



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*“The planning system should **support the transition to net zero by 2050** and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to **radical reductions in greenhouse gas emissions**, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and **support renewable and low carbon energy** and associated infrastructure.” (NPPF 161)*

*“When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: a) **not require applicants to demonstrate the overall need for renewable or low carbon energy**, and **give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future**; b) recognise that small-scale [...] projects provide a **valuable contribution to cutting greenhouse gas emissions**” (NPPF 168)*

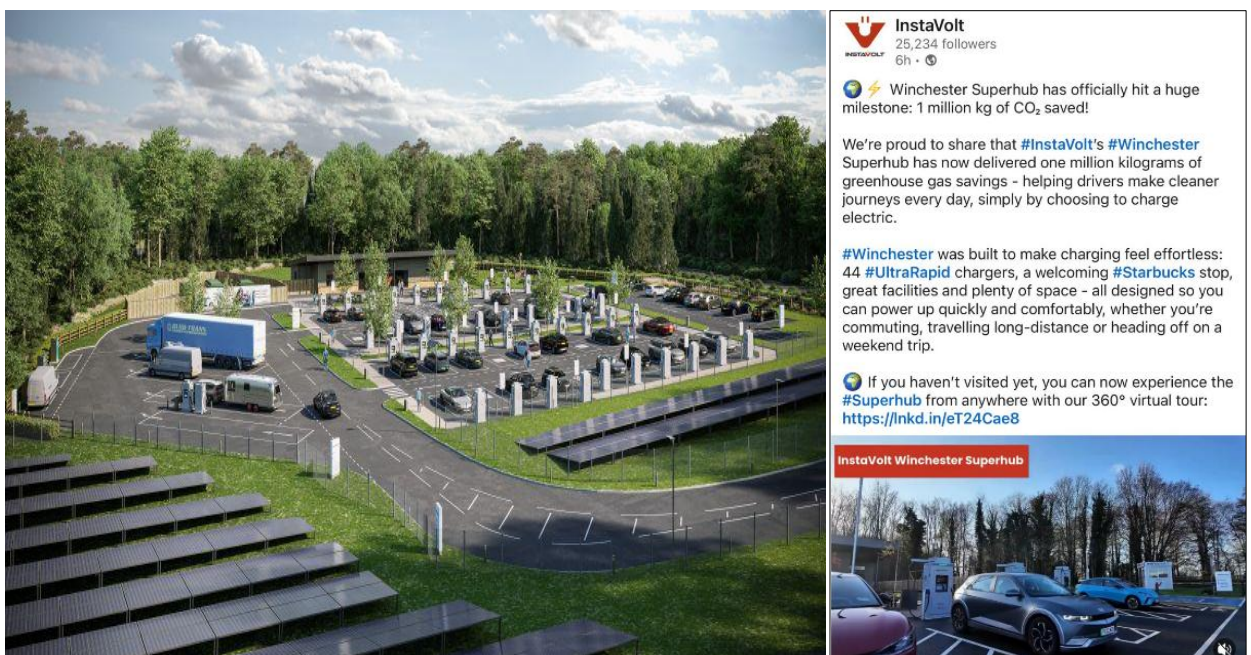
Statement Revision and Issue Date	Report Author	Position	Signed off By	Position
Rev 0 January 2026	Steven Bainbridge BSc MSc MRTPI	Head of Planning	Mark Harding	European Development Director

1. Introduction

- 1.1 Enviromena have pleasure in submitting this planning application for a solar array on land north of the A303, west of Chicklade and northwest of the approved electric vehicle (EV) charging hub being developed at the former Chicklade Services site:



- 1.2 The proposed scheme is for a 3MW 'private-wire' array which will serve the new EV charging service station and will contribute to its already significant environmental credentials.
- 1.3 This planning application has been submitted by Enviromena, on behalf of InstaVolt (the developers and operators of the landmark EV charging hub), it will be built by Enviromena and managed between the two companies.
- 1.4 By way of an example of how this scheme will work is the multi-award winning Three Maids Superhub at Winchester, which is a recently completed EV service station, the largest of its kind in the country, complete with its own solar farm, built by Enviromena:

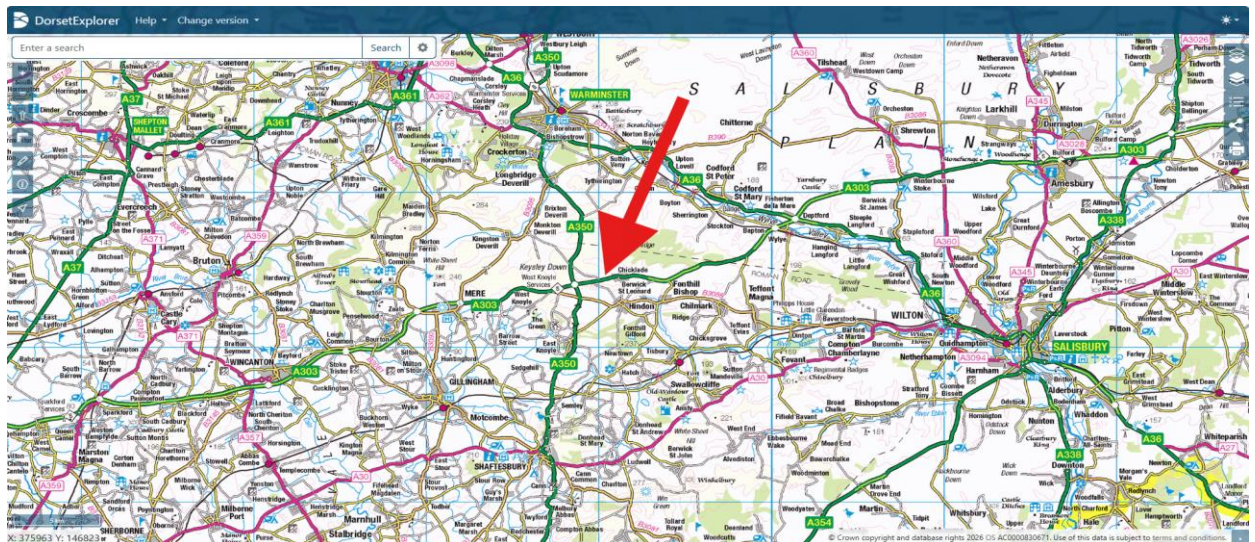


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- 1.5 **Enviromena** is a clean energy company providing safe, affordable, and reliable solutions for growing sustainable power demands. Headquartered in the UK, it is a trusted renewable energy partner with a strong track record of more than 15 years' global experience in constructing, managing, and operating ground-breaking renewable energy projects. The company has built in excess of 730MW globally and has over 2GW of projects in construction and development across the UK and Europe. Enviromena is committed to ensuring that they leave the communities and places that they touch in better condition than when they arrived and is committed to making a positive and significant impact on the causes of climate change and delivering environmental improvements.
- 1.6 **InstaVolt** is the UK's largest, fastest growing and most reliable rapid charge point operator, with over 3000 public rapid chargers across the UK. InstaVolt is committed to the expansion of the UK's public charging infrastructure to support the Government's ambitions to ban the sale of new fossil fuel cars from 2030. To achieve this goal, substantial investment is required by the private sector into new, high quality charging infrastructure for EV drivers to charge in public. InstaVolt expects to invest over £350m up to 2030 to expand its network to 10,000 charge points in the UK alone. Historically, the network has focused on retrofitting small numbers of chargers on existing sites (such as drive-to food and coffee outlets). However, as demand for public charging relentlessly grows, InstaVolt has committed to building larger hubs that provide greater capacity, particularly along the strategic road network.
- 1.7 **Solar power**, as a form of renewable energy, is clearly supported by national and local government and is a well-established and well understood technology type. Where developments require Environmental Impact Assessment (EIA) then the Planning Practice Guidance (PPG) is clear that the key issue is "any visual impact", as distinct to wind and hydro power where key issues also include "scale of the development, noise and ecology". In all cases Local Planning Authorities (LPAs) have their own guidance for solar developments and typically require a range of reports and surveys, which in this case includes; archaeology, arboricultural survey, agricultural land survey, biodiversity net gain report, ecology surveys, flood risk and drainage report, glint and glare assessment, heritage report, landscape and visual impact assessment and transport statement.
- 1.8 This planning application includes an Environmental Statement because of its location in the Cranborne Chase Area of Outstanding Natural Beauty¹ (AONB). Other reports and surveys accompanying this planning application include a report on the agricultural grade of the land, a tree survey, archaeology assessment, ecology surveys, flood risk assessment and drainage strategy, glint and glare, heritage assessment, transport statement and a landscape and visual impact assessment.
- 1.9 The Main Issues in this planning application include the following:
- Compliance with the development plan
 - The influence of material considerations
 - Considerations of the imposition of planning controls where necessary, in order to allow development to go ahead.
- 1.10 All of the above factors will feed into the planning balance of harms and benefits which will be set out at the end of this planning statement.

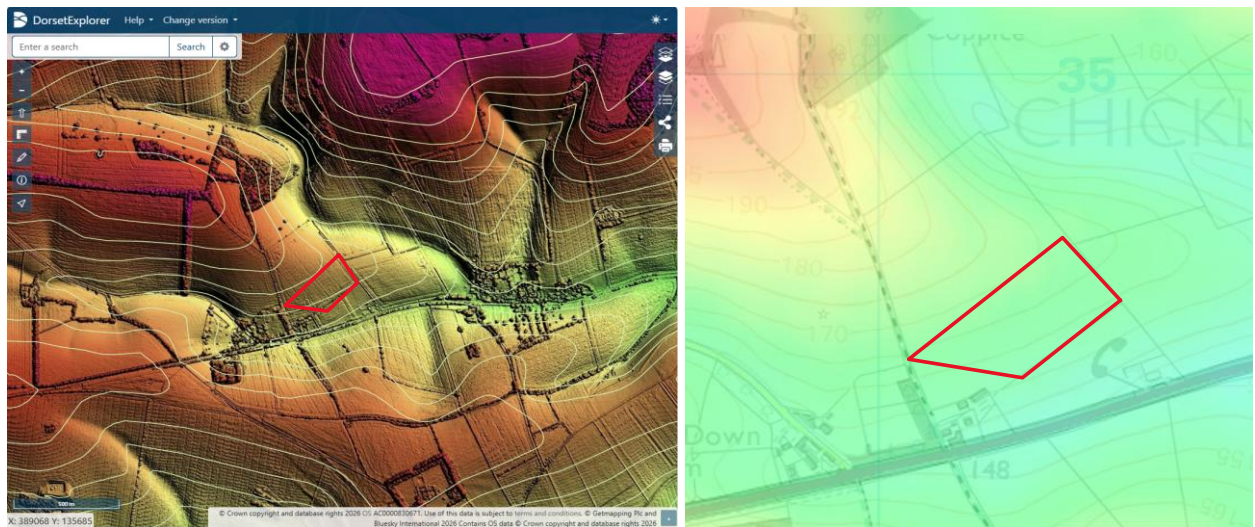
¹ Areas of Outstanding Natural Beauty are still legally called AONBs, plus the term is more commonly understood, while "National Landscapes" is a non-statutory rebranding still to enter common parlance.

2. Site Location and Description

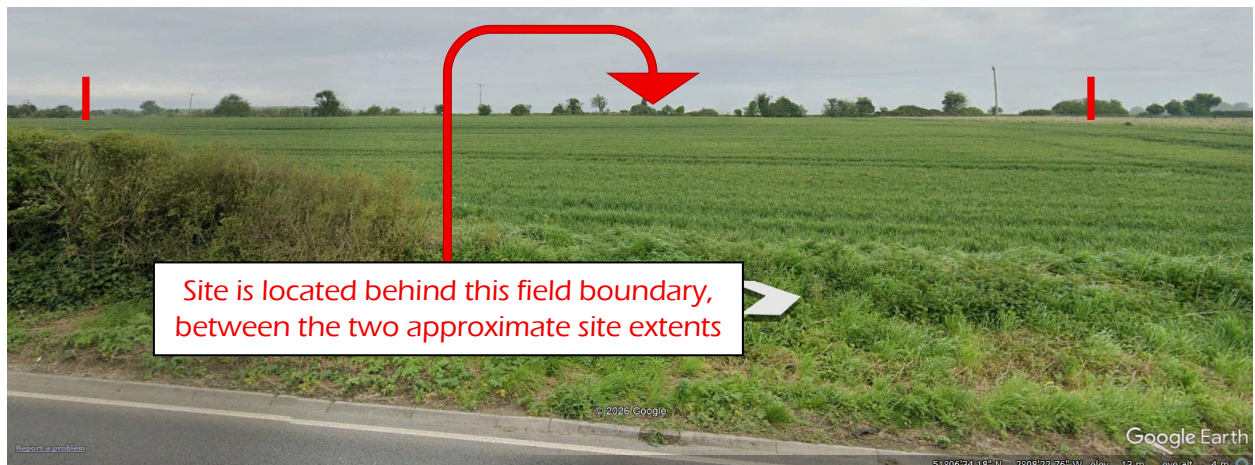
2.1 The site is located north of the A303 in Wiltshire:



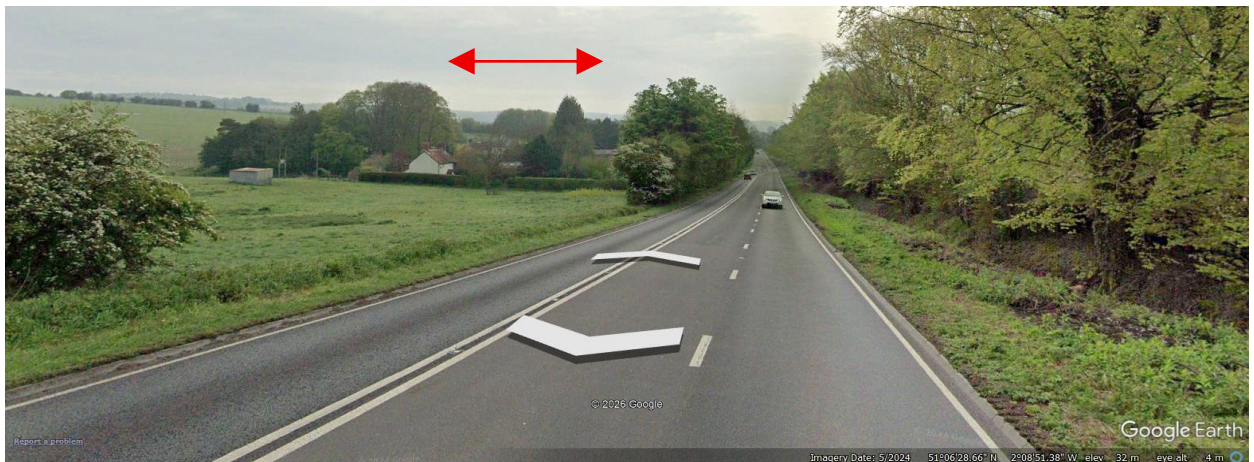
2.2 The wider site extends to c.12ha, however the developmental area within the boundary fence extends to c.2.8ha and is on a sloping site that is some 186m AOD at the northwestern corner, down to 160 AOD at the southeastern corner:



2.3 The site is difficult to see immediately south of the site, behind existing landform and boundary vegetation from the A303:



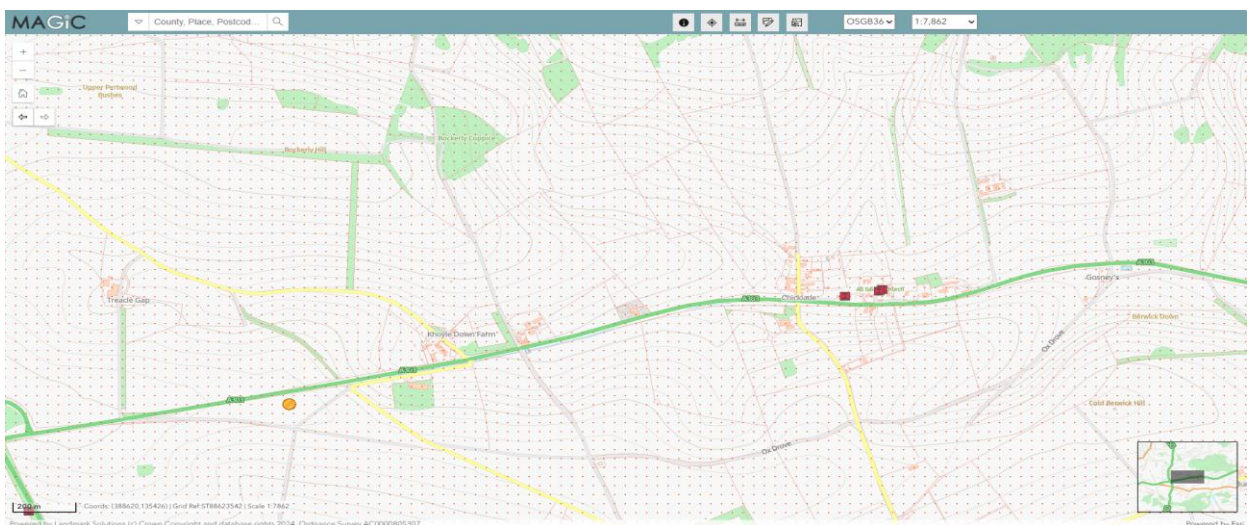
- 2.4 If any view of the site is possible when approached from the west, it will be hidden by the intervening vegetation and buildings:



- 2.5 The existing Chicklade service station has planning permission to be redeveloped, and the new EV service station more comprehensively reduces view to the solar site when approached from the east than the former site:

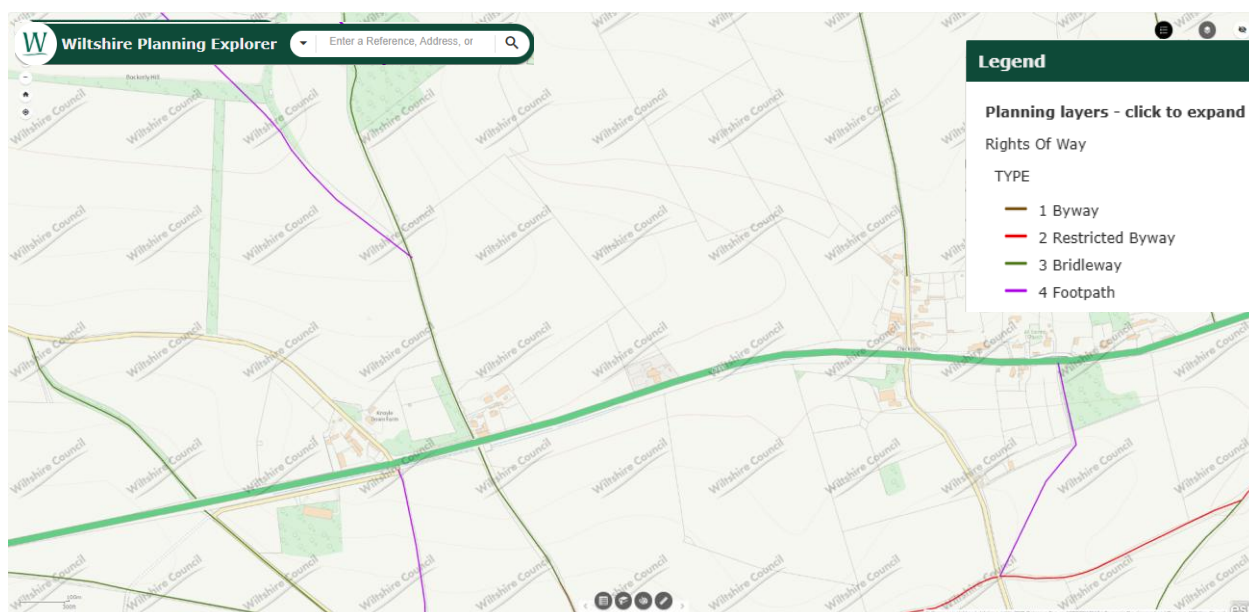


- 2.6 The site is in the Cranborne Chase Area of Outstanding Natural Beauty² (AONB). There is a scheduled monument 770m to the west and GII listed buildings 737m to the east:



² Areas of Outstanding Natural Beauty are still legally called AONBs because that is the statutory designation set out in existing legislation, while "National Landscapes" is a non-statutory rebranding rather than a change in law.

- 2.7 No rights of way cross the site. One bridleway passes along the western boundary of the wider site:



- 2.8 The site is nominally identified as being Grade 3 agricultural land, notwithstanding the findings discussed in our agricultural land classification report.
- 2.9 The proposal would not be the only solar farm in an AONB in Wiltshire, others include:



3. Design and Access

- 3.1 The proposed layout has gone through a number of iterations to refine the design, from an initial site selection exercise, to site-specific design.
- 3.2 Good design is a blend of form and function.
- 3.3 The NPPF states that “135. Planning policies and decisions should ensure that developments: a) will **function well** and **add to the overall quality of the area**, not just for the short term but over the lifetime of the development”.
- 3.4 The approach to the design-assessment of energy infrastructure is set out in NPS EN1 Section 4.7 ‘criteria for good design for energy infrastructure’. It can be a material consideration in planning applications and is especially useful in this case because the NPPF provides no guidance on the approach to design matters for energy infrastructure. NPS EN1 states:

“4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it

relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.

*4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the **quality of the area**.*

4.7.3 Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.

4.7.4 Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle."

- 3.5 The following section provides information on design and access and follows the long-established CABE format, because, in our opinion, the formulaic CABE approach better suites infrastructure development.
- 3.6 It then goes on to provide further design and access information following the approach set out in Planning Practice Guidance³.

CABE approach		
Design	Use	The land will be used for the arrangement of solar arrays in rows. The land can be used for pastoral farming when the solar farm is complete.
	Amount	There will be around 4,500 individual solar modules in rows spaced around 3.2m apart – this is to balance conflicting issues of efficient use of land and panels shading each other.
	Layout	The solar arrays are laid out in an east/west alignment, tilted to the south to face the sun.
	Scale	The scale is 3MW over a site area of 12 hectares, and a development area of c.2.8ha. For the scale of the modules, please see the submitted elevation details.
	Landscaping	Landscaping will consist of hedgerow planting/reinforcement and grassland habitat enhancement following biodiversity net

³ Paragraph: 031 Reference ID: 14-031-20140306 Revision date: 06 03 2014

		gain principles.
	Appearance	The appearance of solar panels in the landscape is not novel and is becoming commonplace in fields and on rooftops. The panels present a dark, slightly reflective surface, atop of a matrix of metal racking across some two fifths of the site, the remainder being open and 'green'.
Access	Vehicular and Transport Links	Access to the site from the A303 will be via the new InstaVolt EV hub.

PPG approach	
Explain the design principles and concepts that have been applied to the proposed development	The siting and location of solar farms is dictated by a well-established range of technical, operational and planning requirements. The arrays are designed in order to use land efficiently, whilst following the topography of the land, in a manner that is not self-defeating. Land Availability: Site options are heavily restrained by land availability. A willing landowner is a major challenge facing renewable energy development. Environmental Designations: Consideration of proximity to areas subject to ecological designation like SSSI, RAMSAR, LNR, Special Areas of Conservation, and Special Protection Areas. Development in such areas is to be avoided. Planning Policy: Site selection is mindful of national and local planning and environmental policy. This ranges from requirements in the NPPF, Local Plan, and Neighbourhood Plans. Sustainable Development: Must be capable of multifunctional enhancements to support the economic, environmental, and social dimensions of sustainable development. Due to the land take required for ground-mount solar farms, they require an open countryside location.
Demonstrate the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account	Following the site selection methodology explained above, the application site was considered a suitable location to propose a solar farm. Key points of appraisal include: • Connection to the EV hub. • Availability of land – from an operational perspective the site is free of physical development constraints, it is available for development (the landowner is supportive) and it is capable of accommodating development immediately.

	• Topography and overshadowing – the land slopes generally from north to south with a fall of some 11m over a distance of some 116m. The field boundaries are well-vegetated and the proposed layout reflects this by keeping panels outside of tree-shaded areas. • Environmental designations – the site is in the AONB. • Solar gain – the site has very good levels of solar irradiation levels.
Explain the applicant's approach to access and how relevant Local Plan policies have been taken into account. Explain how any specific issues which might affect access to the proposed development have been addressed.	Access considerations are limited to the access needs during the construction period, and the immaterial movements associated with subsequent care and maintenance. Initially it was assumed that access would be via the field access to the southwest, and the existing access onto the A303. However, due to a small brick 'build out' on the Mitchell Motors building, visibility to the east on exit was curtailed:  The decision was taken to access through the EV hub, currently under construction. The first section will be surfaced, to reduce dragging debris into the hub roadways, other than that, Enviromena do not build on-site roads, and the access to the site will be grassed. The site has good road connections to the primary road network for construction and maintenance purposes.

4. Outcomes of Surveys

4.1 The planning application is supported by the following assessments, reports and surveys:

- Agricultural land report
- Arboricultural impact assessment
- Archaeological assessment
- Construction and operational traffic management plan
- Ecology survey and report

-
- Environmental statement
 - Flood risk assessment and surface water strategy
 - Glint and glare report
 - Heritage impact assessment
 - Landscape and visual impact assessment

4.2 The submitted agricultural land classification report concludes that

"The part of the large site proposed for the solar panels is Subgrade 3a "good" quality agricultural land.

*There is **no bar to the use of land of BMV quality**. There is a preference to using land of poorer quality, but there is no sequential test, nor is an applicant obliged to show either need for the development (significant weight in favour should be given, the NPPF advises) or that this is the lowest quality land available.*

There is, nevertheless, a preference to using land of the of the lowest quality available.

*The land has been classified as comprising 10.3 ha (83.7%) Subgrade 3a agricultural land and 2 ha (16.3%) Subgrade 3b agricultural land. The area of Subgrade 3b land lies on sloping land to the north and so is not suitable for locating solar panels. It would also be detached from the EV charging station for which the panels will generate energy. Therefore there is **no potential to micro-site the proposed development onto poorer quality land within the Site**.*

*Only a **very small area of land quality will be temporarily affected** for the creation of a base for the associated infrastructure. This area can be restored after decommissioning.*

*For the majority of the Site the land will continue to be used for agricultural purposes. **The resource is not harmed. Land quality is not lost.***

Neither is there any significant effect on land use.** There is no planning policy, no other policy, no initiative and no requirement, for land to be used for active agricultural use or for food production. **Large areas are funded for agri-environmental and tree planting. Many decisions, including Secretary of State decisions relating to large NSIP solar farms, have identified that food production will overall not be significantly harmed. The recent Ministerial Statements make that clear.

*Agricultural land quality should not be a constraint to development. The NPPF requires that it be **recognised, but does not constrain** development, which is significant development, and in any case, there is no evidence that poorer quality land is available within the locality.*

The Wiltshire Council Core Strategy requires assessment to justify the development on BMV land. This has been competed by quantifying the economic and other benefits of the BMV land within the Site, local farming considerations, and why the development cannot be placed on poorer quality land, a small amount of which is within the wider Site.

*Agricultural matters should **not prevent development** for a solar farm in this case."*

4.3 The submitted arboricultural impact assessment is clear that:

"Just one short section of C-grade hedgerow (H2) will need to be removed to construct the proposed development. No other removals or facilitative tree pruning will be required" and concludes that "The proposed solar farm will be surrounded by new native hedgerow planting which will include hedgerow trees as well as an area of woodland tree planting to mitigate visual impacts to the east of the site. Details of the new tree and hedge planting are included on the Landscape Framework Plan produced by LHC Design which accompanies this submission. Overall, the proposed planting will more than compensate for the loss of the short section of hedgerow that will need to be removed and it will result in a much greater canopy cover for the site".

4.4 The submitted archaeological assessment concludes that:

"The assessment provides a detailed understanding of the baseline historic environment and heritage assets of archaeological interest and considered the impacts of the Proposed Development on designated heritage assets as well as non-designated assets listed on the Wilshire HER, within a 1km study area of the Site.

Apart from some sinuous linear anomalies in the geophysical survey, which lack any definitive form to aid in their interpretation, and notwithstanding discrete features are hard to detect by geophysical survey, the potential for archaeological remains within the Site is Low. Any remains that date between the Later Prehistoric to medieval periods may have Low to Medium importance depending on their significance. The impact on any buried archaeological remains, if present, would be on their archaeological interest where development is proposed. A Minor Negative magnitude of impact would result in a Slight Negative significance of effect.

Archaeological remains that relate to the medieval or post-medieval period, such as former field boundaries, cultivation regimes and any extraction activity will have Low importance. The Proposed Development will last for 40 years during which time the land will not be ploughed. Ploughing can be detrimental to the survival of archaeological remains and the Proposed Development will ensure that the archaeological remains will not be impacted by cultivation or any other future development during its lifetime.

*Further detail on the design, and in particular the depth of any invasive groundworks will be supplied later. However, by their nature, the footprint of solar farms and the amount of ground-breaking that is required is generally limited. Impacts depend on the depth of the archaeological horizon, the depth of ground-breaking, the archaeological potential as well as the state of preservation and the significance of any remains. Due to the limited nature of the ground-breaking required and the relatively **Low potential for remains, the impact is likely to be less than substantial in NPPF terms.**"*

4.5 The submitted construction and operational traffic management plan concludes that:

*"In view of the findings within this COTMP, it is considered that the Development is acceptable in transport terms and meets the local and national policy objectives. The COTMP demonstrates that there are **no residual impacts in terms of highway safety or the operational capacity of the surrounding highway** and transport networks and therefore planning permission should not be withheld on transport grounds".*

4.6 The submitted ecology survey concludes that:

"It is proposed to develop a solar farm to facilitate an EV charging hub, with associated

landscaping and localised ground disturbance to provide access and infrastructure. This will remove a limited extent of hedgerow for an access gate, extents of non-cereal crop land, arable field margins and bare ground. No introduction of lighting is proposed for the development.

*The works could initially negatively impact common amphibians, foraging & commuting bats, badgers, birds, dormouse, hedgehog, invertebrates and other mammals, which may be present on site. However, given the **low ecological value of the baseline habitat**, the **retention of the majority of the hedgerows**, and its **replacement with higher-quality habitats**, any impacts are expected to be minor."*

4.7 The submitted biodiversity net gain report concludes that:

"The Biodiversity Metric Assessment (BMA) results in an 150.18% gain for area habitats and a 91.11% gain for hedgerow habitats, with mitigation, compensation and enhancement measures provided for protected species. Consequently, the development is considered to demonstrate a positive biodiversity impact at the site level."

4.8 The environmental statement concludes that:

"In the process of the Environmental Impact Assessment for the 3MW solar array and ancillary development a wide range of potential impacts have been considered, utilising the skills and expertise of individual independent specialists to assess the proposals.

The LVIA identifies major to moderate adverse landscape effect (for the duration of the solar array operation), slight to moderate adverse effect on the NCA and moderate adverse effect on the National Landscape. The identified landscape impacts are predicted for the operational lifetime of the solar array and are reversible thereafter.

The proposed BNG measures is considered to be moderate to major beneficial at a local scale for the lifetime of the development.

Similarly, the generation of renewable energy and offsetting of fossil fuel produced carbon is considered to be moderate beneficial, at a local scale for the lifetime of the development."

4.9 The submitted flood and drainage report concludes that:

"The development is located fully within flood zone 1.

There are no watercourses on or adjacent to the site.

The site is at low risk of surface water flooding.

The site is at low risk of groundwater flooding.

The site soil will be appropriately managed during and post construction to maintain permeability and reduce the risk of increased runoff. As a precaution, a cut-off swale can be installed on the downhill side of the panels"

4.10 The submitted heritage impact assessment concludes that:

*"The above assessed settings of relevant heritage assets are not sensitive to the proposed changes and **no harm** has been identified. Potential glimpses of some solar panels from a 900m distance will **not lead to any harm** to the moderate significance of Chicklade House or the low significance of non-designated farm buildings on the Western edge of the village."*

4.11 The submitted glint and glare study concludes that:

"No significant impacts are predicted upon road safety, residential amenity and aviation activity. Mitigation is not recommended".

4.12 The submitted landscape and visual impact assessment concludes that:

- In relation to the AONB – *"The changes are long term and experienced over an intermediate area resulting in an **overall moderate** adverse effect"*
- In relation to Salisbury plan and west Wiltshire downs national character area – *"the magnitude of effect on the NCA is assessed as low, with an overall significance of **slight to moderate** adverse"*
- In relation to visual effects – *"The greatest visual effects occur for users of public rights of way closest to the site [...] At a wider scale, effects on long-distance routes such as the Monarch's Way are **limited**, with the development visible only as a very **small and distant** element within expansive panoramic views, resulting in **slight to moderate** adverse effects. No visual effects are predicted for the Wessex Ridgeway or bridleways further south, where landform and woodland block any views of the site".*

5. Development Plan

5.1 Planning law is clear that planning applications should be determined against the policies of the development plan unless material considerations dictate otherwise.

5.2 In this case the development plan consists of:

- Wiltshire Core Strategy 2015⁴
- Saved Policies of the 2011 Salisbury District Local Plan

5.3 The Core Strategy only contains strategic policies. The NPPF is clear on the approach to using strategic policies for decision making:

*"20. Strategic policies should **set out an overall strategy** for the pattern, scale and design quality of places and make sufficient provision for:*

- a) homes (including affordable housing), employment, retail, leisure and other commercial development;*
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) community facilities (such as health, education and cultural infrastructure); and*
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

*21. Plans should make explicit which policies are strategic policies. These **should be limited to those necessary to address the strategic priorities of the area** (and any relevant cross-boundary issues), to provide a clear **starting point** for any non- strategic policies that are*

⁴ The Core Strategy was submitted to the SoS in 2012 and was therefore being written in the years prior to 2012. Its content is therefore older than the adoption date, some 15 years old.

needed. **Strategic policies should not extend to detailed matters** that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.

22. Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery."

- 5.4 The NPPF is clear on the approach to using non-strategic policies for decision making:

*"29. **Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development.** This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies".*

- 5.5 This is important because the Core Strategy's policies are not development management policies, the LPA having not adopted a Development Management DPD. Accordingly, the use of strategic policies as a basis for refusal would necessitate demonstrating that the proposal would prejudice the delivery of the Core Strategy's overall objectives. For anything other than strategic-scale development, it would be unreasonable to conclude that it would have such strategic implications.

- 5.6 Potentially relevant strategic policies are listed below, and then analysed for their relevance to decision making:

- Core Policy 1 Settlement Strategy
- Core Policy 2 Delivery Strategy
- Core Policy 3 Infrastructure Requirements
- Core Policy 20 Spatial Strategy for the Salisbury Community Area
- Core Policy 41 Sustainable Construction and Low Carbon Energy
- Core Policy 42 Standalone Renewable Energy Installations
- Core Policy 48 Supporting Rural Life
- Core Policy 50 Biodiversity
- Core Policy 51 Landscape
- Core Policy 52 Green Infrastructure
- Core Policy 57 Ensuring High Quality Design and Place Shaping
- Core Policy 58 Ensuring the Conservation of the Historic Environment
- Core Policy 67 Flood Risk

- 5.7 **Core Policy 1** is focused on the types of development that will go inside settlements and is not relevant to decision making in this case.

- 5.8 **Core Policy 2** focusses on housing numbers, employment land and retail floorspace and does not read as relevant to decision making in this case.

- 5.9 **Core Policy 3** concerns the infrastructure demands created by development; typically the

kinds of infrastructure required in s106 agreements and/or covered by CIL. This scheme will not generate any infrastructure demands on Wiltshire.

5.10 **Core Policy 20** drills down from Core Policy 1 as relevant to the Salisbury Community Area. Core Policy 1 is not relevant, and nor is Core Policy 20 as a result.

5.11 **Core Policy 41** is key to delivering the Core Strategy's approach to tackling climate change. Insofar as the policy is relevant, it requires existing buildings to retrofit measures to use renewable energy from a local source. Whilst the EV hub is approved to use a small amount of solar power already, this scheme will contribute further to the site's energy demand, providing EV drivers with renewable energy for charging their vehicles close to the source of demand.

5.12 **Core Policy 42** concerns standalone renewable energy proposals. Core Policy 42 does not introduce substantive decision-making criteria against which proposals are to be judged. Rather, it confirms the principle of standalone renewable energy development and identifies matters to be assessed through reference to other relevant Core Policies. As such, the acceptability of proposals necessarily turns on compliance with those other policies, rather than on Core Policy 42 itself. We respond to the policy's assessment requirements below, in as far as they are relevant, determinative or useful:

Core Policy 42	Our response
<i>Proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site specific constraints. In particular, proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account:</i>	Whilst this scheme is not standalone, the general support for renewable energy schemes is noted.
<i>i. The landscape, particularly in and around AONBs</i>	This planning application includes the Landscape and Visual Impact assessment which underpins the Environmental Statement, satisfactorily assessing the scheme in landscape terms. Cumulative assessment of nearby development, including the EV hub, is part and parcel of that assessment.
<i>ii. The Western Wiltshire Green Belt</i>	Not relevant.
<i>iii. The New Forest National Park</i>	Not relevant.
<i>iv. Biodiversity</i>	Site specific surveys have been undertaken, with mitigation recommended and Biodiversity Net Gain proposals in addition, demonstrating that biodiversity has been satisfactorily assessed.
<i>v. The historic environment including the Stonehenge and Avebury World Heritage</i>	The planning application is supported by two relevant assessments; a heritage impact assessment (above ground heritage) and an

<i>Site and its setting</i>	archaeological assessment (below ground heritage).
<i>vi. Use of the local transport network</i>	The planning application is supported by a Transport Statement setting out the transport implications of the scheme.
<i>vii. Residential amenity, including noise, odour, visual amenity and safety</i>	The planning application is supported by a Glint and Glare assessment which focusses on residential amenity amongst other industry-standard factors.
<i>viii. Best and most versatile agricultural land.</i>	The planning application is supported by an Agricultural Land Classification report so that the implications of the scheme on BMV land can be assessed.
<i>Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context.</i>	This repeats national policy and is noted.

5.13 **Core Policy 48** seeks to support rural life. It focusses on dwellings, access to services, re-use of rural buildings, community ownership of facilities and new shops, none of which are relevant in this case.

5.14 **Core Policy 50** concerns biodiversity. It requires development proposal to demonstrate how they protect biodiversity. The submitted ecology survey and report does this. The policy prefers the retention and management of features on site, but where that is not possible, it pursues mitigation as far as possible. The policy seeks no net loss of biodiversity. Beyond that the policy requires major development to deliver biodiversity gains. This proposal delivers significant amounts of BNG; 150% gains for habitats and 91% gains for hedgerows.

5.15 **Core Policy 51** concerns landscape. It requires development to protect, conserve and where possible enhance landscape character. It seeks to avoid harmful impacts to landscape character through assessment, sensitive design, mitigation and enhancement. It provides a suite of topics against which proposals can demonstrate compliance, to which we respond in turn below:

Core Policy 51 Landscape Character Consideration	Our Response
<i>i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.</i>	The solar arrays are laid out to avoid field boundaries. No disturbance to the local field pattern is required by this scheme.
<i>ii. The locally distinctive character of settlements and their landscape settings.</i>	The scheme does not impact the landscape setting of any settlement.
<i>iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.</i>	The scheme is associated with the consented EV hub, and therefore will not compromise the separate identity of

	settlements.
<i>iv. Visually sensitive skylines, soils, geological and topographical features.</i>	The landscape and visual impact assessment includes viewpoints photos. Solar development follows and relates to the topography of the land. Due to landform, the proposal does not impact on any skylines. The proposal will not lead to the loss of or harm to soils. In fact, resting land from intensive arable use for decades is a benefit to soil organic content and structure.
<i>v. Landscape features of cultural, historic and heritage value.</i>	The proposal will not adversely affect any landscape features of heritage value.
<i>vi. Important views and visual amenity.</i>	The proposal will not affect any known 'important views'. There is no neighbourhood plan to identify such. In terms of visual amenity, the landscape and visual impact assessment assesses the scheme from viewpoints in the local area, most of which relates to the zone of theoretical visibility. For the avoidance of doubt a number of views are taken from locations along the Wessex Ridgeway and Monarch's Way in the event these constitute 'important views'. The LVIA assesses the visual impacts of the scheme in the theoretical baseline of a bare ground ZTV, and then after development has commenced at various intervals when landscaping and mitigation has had effect.
<i>vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.</i>	Solar farms are essentially silent. Some barley audible noise (a low 'hum') may be audible within metres of the inverters but are imperceptible from outside of the fenced boundaries of our sites. Our sites are not lit, and only the small transformer station might have a small personnel light on its door for health and safety reasons; which is only triggered on the rare occasion of a maintenance visit. Once complete there will be no motion associated with the scheme. It will not affect the tranquillity of the area.
<i>viii. Landscape functions including places to live, work, relax and recreate.</i>	The only landscape function which this scheme could interfere with is recreation. The site is adjacent to a right of way and may be visible from other rights of way in the area. In all cases the site is likely to be

	seen in the context of the neighbouring EV hub, reducing the harm.
<i>ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.</i>	Whilst not clearly set out in the AONB Management Plan, the special qualities of the Cranborne Chase appear to be set out in its paragraph 2.1 as “<i>diversity, distinctiveness, sense of history and remoteness, dark night skies, tranquillity; and its overwhelmingly rural character</i>”. This proposal will not fundamentally undermine any of the AONBs special qualities by virtue of its relatively small size, its low height, topographical sensitivity and light footing on the land.

- 5.16 The LVIA concludes on landscape character “*the magnitude of effect on the NCA is assessed as low, with an overall significance of **slight to moderate** adverse*”.
- 5.17 Core Policy 51 goes on to state that proposals for development within the AONB shall demonstrate it has taken account of the objectives, policies and actions in the relevant management plan. These are discussed in the Material Considerations section below in greater detail, but in summary “*The changes are long term and experienced over an intermediate area resulting in an **overall moderate** adverse effect*”
- 5.18 **Core Policy 52** concerns green infrastructure and requires development to make provision for green infrastructure networks. This scheme will not interrupt the site’s green infrastructure networks because the development is set within the vegetated boundaries of the site. In fact the provision of new and enhanced boundary planting will support green infrastructure.
- 5.19 **Core Policy 57** concerns ensuring high quality design. When discussing ‘development’, local plans are predominantly concerned with housing and employment. This is often seen where policies talk of local vernacular and materials for example.
- 5.20 High quality design is a blend of form and function. The NPPF states that “*135. Planning policies and decisions should ensure that developments: a) will **function well** and **add to the overall quality of the area**, not just for the short term but over the lifetime of the development*”.
- 5.21 The approach to the design-assessment of energy infrastructure is set out in NPS EN1 Section 4.7 ‘criteria for good design for energy infrastructure’. It can be a material consideration in planning applications and is especially useful in this case because the NPPF provides no guidance on the approach to design matters for energy infrastructure. NPS EN1 states:
- “*4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.*
- 4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an*

appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.

4.7.3 Good design is also a means by which many policy objectives in the NPPs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.

4.7.4 Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle."

- 5.22 The policy requires a high standard of design in all new developments, and insofar as solar development is concerned, this scheme is high quality in relation to the materials, layout and landscaping.
- 5.23 Accepting that ground-mounted solar necessitates a countryside setting, and that this scheme serves the approved EV hub, increasing its sustainability credentials, the scheme relates positively to its setting; the approved EV hub, the A303, nearby commercial buildings and overhead electrical infrastructure. The scheme retains existing landscape features (boundary hedgerows and trees). The scheme responds positively to the local topography having selected a site that is in the lower reaches of available land to minimise landscape impacts.
- 5.24 The policy also talks of maximising sustainable construction techniques. Whilst InstaVolt are in the process of submitting details on materials, this policy aims speaks to Core Policy 41 and the enhanced sustainability credentials of the EV hub sourcing more of its green energy locally, at source.
- 5.25 **Core Policy 58** seeks to ensure conservation of the historic environment. This planning application is supported by above and below ground heritage studies. The heritage impact assessment confirms that any harm to the above-ground historic environment is less than substantial, at most. The archaeology survey confirms that any harm is also less than substantial.
- 5.26 **Core Policy 67** relates to flood risk and discusses the application of sequential testing in flood zones 2 and 3. The site is in flood zone 1. The policy goes on to require SuDS measures unless they are unsuitable. The submitted drainage report is clear that:
- *The development is located fully within flood zone 1*
 - *There are no watercourses on or adjacent to the site*
 - *The site is at low risk of surface water flooding*
 - *The site is at low risk of groundwater flooding*
 - *The site soil will be appropriately managed during and post construction to maintain permeability and reduce the risk of increased runoff. As a precaution, a cut-off swale can be installed on the downhill side of the panels*
- 5.27 Overall, the assessment above demonstrates that the proposal accords with the development plan when its policies are applied for decision-making purposes in accordance with the NPPF.

The Wiltshire Core Strategy is a strategic document, and none of its relevant policies are development management policies capable of justifying refusal unless the proposal would prejudice the delivery of the Strategy's overarching objectives. For a development of this scale and nature, associated directly with an existing consented EV hub, no such strategic prejudice arises. Where strategic policies are engaged—most notably those relating to climate change, renewable energy, biodiversity, landscape, design, the historic environment and flood risk—the proposal has been supported by appropriate technical assessments and demonstrates compliance with the policy intent, either by avoiding harm, mitigating impacts, or delivering clear environmental and sustainability benefits.

- 5.28 In particular, the proposal supports the Core Strategy's objectives on tackling climate change and supporting renewable energy generation, protects and enhances biodiversity, conserves landscape character including the special qualities of the AONB, achieves a high standard of functional and contextual design, safeguards the historic environment, and poses no flood risk concerns. Saved policies of the Salisbury District Local Plan raise no conflicts, and there is no adopted development management framework that would indicate otherwise. Taken as a whole, the proposal is consistent with the development plan when read as a whole and in the manner required by national policy. Accordingly, the statutory presumption in favour of determination in accordance with the development plan applies, with no policy conflict that would warrant refusal.

6. Material Considerations

- 6.1 There are a wide range of material considerations in this case:

- National Planning Policy Framework December 2024 v2
- Wiltshire Local Plan Review
- National Planning Policy Framework December 2025 consultation draft
- Clean Power 2030 Action Plan December 2024
- Solar Roadmap June 2025
- Overarching National Policy Statement for Energy EN1 January 2026
- National Policy Statement for Renewable Energy Infrastructure EN3 January 2026
- Planning Practice Guidance
- British Energy Security Strategy (April 2022)
- Powering up Britain: Main Summary, Net Zero Growth Plan and Energy Security Plan (March 2023)
- Net Zero Strategy: Build Back Greener (October 2021)
- Invest 2035: The UK's Modern Industrial Strategy (UK Government, June 2025)
- A Climate for Change: Adaptation and the National Trust (2023)
- Cranborne Chase AONB Management Plan 2019 to 2024
- Wiltshire Renewable Energy Study Landscape Sensitivity Assessment 2023
- Wiltshire Local Transport Plan 4

National Planning Policy Framework December 2024 v2

- 6.2 The National Planning Policy Framework (December 2024) is a primary material consideration and attracts substantial weight.
- 6.3 Paragraph 11 confirms that the planning system's purpose is to contribute to the achievement of sustainable development, which is defined through economic, social and environmental objectives. Paragraph 8 makes clear that these objectives are mutually supportive and should be pursued in an integrated manner.

Climate Change and Renewable Energy

- 6.4 Paragraph 161 confirms that the planning system should support the transition to a low-carbon future and help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. Paragraph 168 is of particular relevance. It requires local planning authorities, when determining applications for renewable and low-carbon energy development and associated infrastructure, to give significant weight to the benefits associated with renewable energy generation and its contribution to a net-zero future, and not to require applicants to demonstrate the overall need for renewable energy (paragraph 168(a)). It further recognises that small-scale and localised renewable energy projects make a valuable contribution to cutting greenhouse gas emissions (paragraph 168(b)).
- 6.5 The proposal directly engages these provisions by delivering renewable electricity generation to serve a consented EV charging hub, reducing reliance on grid electricity and fossil-fuel-derived energy sources.

Sustainable Transport and Transport Decarbonisation

- 6.6 Paragraphs 110 and 111 of the Framework support the development of a transport system that reduces greenhouse gas emissions and promotes sustainable transport modes. Paragraph 110(a) seeks to facilitate the shift to low-carbon transport, while paragraph 111 requires development to give priority to pedestrian, cycle and public transport movements and support emerging technologies.
- 6.7 The proposal makes a direct and tangible contribution to these objectives by enabling renewable energy generation to support electric vehicle charging infrastructure on the Strategic Road Network. This functional relationship between energy generation and transport decarbonisation is a highly material consideration and attracts significant positive weight.

Economic Development and a Sustainable Economy

- 6.8 Paragraph 85 requires planning decisions to support economic growth, productivity and competitiveness, including in emerging sectors. Paragraph 86 confirms that significant weight should be placed on the need to support economic growth and productivity.
- 6.9 The proposal supports the clean energy and electric mobility sectors, both identified nationally as priority growth industries. It represents private sector investment in infrastructure that underpins a modern, low-carbon economy and supports the transition of the transport network away from fossil fuels.

Good Design

- 6.10 Paragraphs 131 and 135 of the Framework emphasise that good design is a key aspect of sustainable development and that developments should be visually attractive, sympathetic to local character, and functionally efficient.

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- 6.11 The proposal has been designed to reflect its landscape context, minimise visual intrusion, and operate efficiently in functional association with the EV hub. Design in this context must be understood in terms of infrastructure efficiency, landscape integration and reversibility, all of which are achieved.

Paragraph 190 – Major Development in National Landscapes

- 6.12 Paragraph 190 of the National Planning Policy Framework (December 2024 v2) establishes that permission should be refused for major development within National Landscapes other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. The Framework identifies three matters to be assessed in determining whether such exceptional circumstances exist.
- 6.13 The proposal has been assessed against each of these matters, informed by the Landscape and Visual Impact Assessment (LVIA) prepared by LHC Design (January 2026).
- (a) The need for the development, including any national considerations, and the impact of permitting or refusing it upon the local economy
- 6.14 There is a clear and compelling national need for renewable and low-carbon energy development, particularly where it directly supports the decarbonisation of transport infrastructure. National policy requires significant weight to be given to the benefits of renewable energy generation and makes clear that applicants are not required to demonstrate the overall need for such development.
- 6.15 In this case, the proposal has a direct and functional relationship with the consented EV charging hub adjacent to the site, supplying renewable electricity at source via a private-wire arrangement. This relationship materially strengthens the public interest case, as the development enables low-carbon transport infrastructure on the Strategic Road Network and reduces reliance on grid electricity.
- 6.16 The LVIA identifies that the site sits within a landscape already strongly influenced by the A303 transport corridor, associated commercial development and infrastructure, with existing reductions in tranquility and landscape quality at the valley floor (LVIA paragraphs 4.9, 4.33–4.34). Locating the solar development in this context avoids more remote, tranquil and visually sensitive parts of the National Landscape and represents a proportionate response to the identified need
- 6.17 At a local level, the development supports rural economic diversification and reinforces investment in clean energy and transport infrastructure. Refusal would frustrate these benefits and undermine the effective delivery of nationally important decarbonisation objectives.
- (b) The cost of, and scope for, developing outside the designated area, or meeting the need in some other way*
- 6.18 The scope for meeting the identified need outside the designated landscape is materially constrained. The LVIA confirms that the site has been selected due to its proximity to the EV charging hub, its containment by landform and vegetation, and its location within a developed transport corridor (LVIA paragraphs 3.2, 4.7–4.9, 6.14)
- 6.19 Relocating the development outside the National Landscape would sever the functional relationship with the EV hub, require additional infrastructure, increase costs, and reduce the efficiency and carbon benefits of the scheme. Alternative locations would not deliver the same co-location of generation and demand and would likely introduce new landscape and

visual effects elsewhere.

- 6.20 The LVIA demonstrates that the chosen site has a **medium landscape sensitivity**, with opportunities for mitigation, and a **medium ability to accept change**, particularly when compared to more open and tranquil parts of the National Landscape (LVIA paragraphs 6.9–6.10)
- 6.21 In this context, there is no preferable or realistic alternative that would meet the need in a less harmful way.
- (c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated*
- 6.22 The LVIA provides a comprehensive assessment of landscape and visual effects at site, local and wider landscape scales.
- 6.23 At the **site and immediate surroundings**, the LVIA identifies a **major to moderate adverse landscape effect**, reflecting the fundamental change from arable land to solar development (LVIA paragraph 6.12). However, this effect is localised and moderated by substantial mitigation, including retained and reinforced hedgerows, new woodland planting and wildflower grassland, which also deliver landscape and ecological enhancement
- 6.24 At the scale of the **National Character Area**, the LVIA concludes that the magnitude of change is **low**, with an overall **slight to moderate adverse effect**, reflecting the limited geographical extent of visibility and the site's location close to existing infrastructure (LVIA paragraphs 6.15–6.17)
- 6.25 Within the **Cranborne Chase National Landscape**, the LVIA identifies a **moderate adverse effect**, arising from the area's high sensitivity, but confirms that the proposals are small in scale relative to the wider landscape, do not affect key archaeological features, and accord with landscape character objectives through retention and enhancement of field boundaries (LVIA paragraphs 6.18–6.19)
- 6.26 Visual effects are similarly nuanced. The LVIA confirms that visibility from the A303 and nearby minor roads is **negligible to minimal adverse**, while the greatest visual effects are experienced by users of bridleways closest to the site, where **major to moderate adverse effects** reduce over time as mitigation planting establishes (LVIA paragraphs 7.8–7.18)
- 6.27 Effects on long-distance routes such as the Monarch's Way are limited, distant and slight to moderate adverse, with no effects on the Wessex Ridgeway.
- 6.28 Overall, the LVIA demonstrates that landscape and visual effects are limited in extent, appropriately mitigated, and do not undermine the special qualities of the National Landscape.

Conclusion on Paragraph 190

- 6.29 When assessed against the tests in paragraph 190, the proposal demonstrates exceptional circumstances. The urgent national need for renewable energy and transport decarbonisation, the absence of realistic alternatives, and the LVIA's evidence that effects are localised, mitigated and acceptable in planning terms combine to establish a clear public interest case.

Wiltshire Local Plan Review

- 6.30 The Wiltshire Local Plan Review (Pre-Submission Draft, Regulation 19, September 2023) is an

emerging development plan document and therefore a material consideration, to which limited weight can be afforded reflecting its current status

- 6.31 Notwithstanding its emerging status, the Local Plan Review provides a clear and relevant statement of the Council's strategic direction, particularly in relation to climate change mitigation, renewable energy, sustainable transport, economic resilience and environmental enhancement.

Strategic Direction of the Local Plan Review

- 6.32 The Spatial Vision for Wiltshire seeks to achieve "significant strides towards carbon neutrality" by 2038, supported by renewable energy generation, sustainable transport, a resilient green economy, high quality design and meaningful biodiversity net gain
- 6.33 Climate change mitigation and adaptation are identified as cross-cutting priorities running through the Plan as a whole, rather than isolated policy considerations.
- 6.34 The Plan explicitly recognises that emissions from transport and energy use are central challenges, and that facilitating renewable energy generation and low-carbon infrastructure is essential to addressing these issues
- 6.35 It also emphasises the need to support sustainable economic growth, including green technology sectors, and to deliver infrastructure that enables the transition to electric and low-carbon transport.
- 6.36 These strategic objectives are directly relevant to the proposal, which provides renewable electricity generation to support an operational EV charging hub, thereby contributing simultaneously to energy decarbonisation, transport decarbonisation and the sustainable economy.

Climate Change, Renewable Energy and Transport

- 6.37 The Local Plan Review contains a comprehensive climate change strategy, acknowledging a legal and policy obligation to reduce carbon emissions and facilitate renewable energy generation
- 6.38 It explicitly supports proposals that contribute to renewable and low-carbon energy infrastructure and the decarbonisation of transport, recognising that such measures are essential to meeting both local and national targets.
- 6.39 In this context, the proposal aligns with the Plan's stated objectives by:
- generating renewable electricity;
 - supporting EV infrastructure on the Strategic Road Network;
 - reducing emissions associated with transport;
 - and contributing to a resilient, low-carbon energy system.

Environmental Enhancement, Design and Biodiversity

- 6.40 The Plan's environmental objectives go beyond impact avoidance and place strong emphasis on environmental enhancement, including biodiversity net gain, green and blue infrastructure and high-quality design
- 6.41 The proposal's landscape strategy, ecological mitigation and biodiversity enhancements are consistent with this approach and reflect the Plan's recognition that development can play a role in nature recovery when appropriately designed.

Weight in Light of the Inspectors' Letter

- 6.42 The Inspectors' post-Stage 2 hearings letter of 22 December 2025 identifies a number of soundness issues with the Local Plan Review, particularly in relation to housing numbers, distribution, employment land strategy and the plan period
- 6.43 The Inspectors make clear that their views are preliminary and without prejudice to the final report, but they also require substantial further work before the Plan can proceed to adoption.
- 6.44 These findings confirm that the Local Plan Review currently attracts limited weight, particularly where detailed policies or site-specific elements are concerned. However, the Inspectors' letter does not call into question the Plan's overarching emphasis on climate change mitigation, renewable energy, sustainable transport or environmental enhancement. Indeed, those objectives are consistent with national policy and remain part of the Plan's strategic framework.
- 6.45 Accordingly, while the Local Plan Review cannot be treated as determinative, its strategic direction is a material consideration that lends support to development proposals which advance renewable energy generation, transport decarbonisation and sustainable economic growth.

Overall Relevance to the Proposal

- 6.46 Taken as a whole, the Wiltshire Local Plan Review:
- identifies climate change and transport emissions as key challenges;
 - supports renewable energy and low-carbon infrastructure;
 - promotes sustainable economic development and green technology;
 - and encourages high quality design and biodiversity enhancement.
- 6.47 The proposal is consistent with these strategic objectives. When read alongside the Inspectors' letter, the appropriate approach is to afford limited weight to the emerging Plan's detailed policies, but to recognise that its overarching direction reinforces, rather than undermines, the principle and benefits of the development.

National Planning Policy Framework December 2025 consultation draft

- 6.48 The draft National Planning Policy Framework (December 2025 consultation) is an emerging material consideration to which limited weight can be afforded but is a clear and compelling direction of travel from Government, not least the **substantial weight** to be given to renewable energy generation and the presumption in favour introduced in draft policy S5 which clearly states that:
- "certain forms of development should be approved outside settlements, as set out in the following list. These **should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects**, when assessed against the national decision-making policies in this Framework"*
- 6.49 Those certain forms of development include **energy infrastructure**.
- 6.50 The draft Framework reinforces existing national policy support for renewable and low-carbon energy development, sustainable transport and economic growth within a net-zero context. It strengthens the emphasis on climate change mitigation, transport decarbonisation

and the delivery of clean energy infrastructure.

- 6.51 There is nothing within the draft Framework that would undermine the principle of the proposed development. Instead, it reinforces the direction of travel established in the adopted Framework and provides additional support for proposals that deliver renewable energy, enable electric vehicle infrastructure and contribute to a sustainable economy.

Policy N4.2 – Major Development in Protected Landscapes

- 6.52 Draft policy N4.2 reiterates the established approach to major development in protected landscapes, requiring proposals to be supported only in exceptional circumstances and where they are in the public interest. While the policy is emerging and attracts limited weight, it provides a clearer articulation of the same assessment framework and is framed more positively than the 2024 NPPF and its predecessors.
- 6.53 The proposal meets the need test through its direct role in delivering renewable energy to support EV infrastructure, aligning with national considerations relating to clean energy, energy security and transport decarbonisation. The site selection and alternatives assessment demonstrates that there is no realistic scope to meet this need outside the designated landscape without materially reducing the effectiveness of the development.
- 6.54 In environmental terms, the LVIA confirms that while some adverse landscape and visual effects arise, these are confined, proportionate, and mitigated through design and landscape enhancement. The effects on the Cranborne Chase National Landscape are assessed as **moderate adverse**, reflecting sensitivity rather than unacceptable harm, and the development is explicitly located within a corridor already influenced by major infrastructure, avoiding more sensitive and tranquil areas of the designation
- 6.55 Accordingly, when informed by the detailed findings of the LVIA, the proposal satisfies the exceptional circumstances and public interest tests set out in draft policy N4.2, reinforcing the conclusion reached under paragraph 190 of the adopted Framework.

Clean Power 2030 Action Plan December 2024

- 6.56 The Clean Power 2030 Action Plan (December 2024) is a material consideration that underscores the urgency of deploying renewable energy at scale and pace. The Action Plan emphasises the importance of schemes that can be delivered efficiently, connect directly to demand and support electrification of transport. The proposal aligns directly with these objectives and attracts positive weight.

Solar Roadmap June 2025

- 6.57 The Solar Roadmap (June 2025) is a material consideration that provides strategic direction for the expansion of solar energy deployment. The Roadmap emphasises the need to remove unnecessary barriers to solar development, to support a range of deployment scales, and to recognise the contribution of distributed and locally connected schemes. It highlights the importance of solar energy in supporting both grid decarbonisation and the electrification of transport. The proposal aligns directly with the objectives of the Solar Roadmap. It represents a locally connected solar scheme that supports energy demand associated with transport infrastructure, delivering efficient and targeted decarbonisation benefits.

Overarching National Policy Statement for Energy EN1 January 2026

- 6.58 The Overarching National Policy Statement for Energy (EN-1) is a significant material consideration. Paragraphs 3.1.1 and 3.1.2 confirm the urgent and continuing need for renewable energy infrastructure and require that this need be given substantial weight in decision-making. EN-1 recognises that localised environmental effects may arise but makes clear that they must be weighed against national energy and climate objectives. Paragraph 4.5.3 emphasises that good design for energy infrastructure should be assessed in light of functional requirements and applied “as far as possible”. The proposal accords with these principles.

National Policy Statement for Renewable Energy Infrastructure EN3 January 2026

- 6.59 EN-3 provides technology-specific policy support for solar PV and is a material consideration of significant and compelling weight. The document confirms the importance of solar energy to the UK’s future energy mix and recognises that ground-mounted solar development will often be located in rural areas. It confirms that visual effects are to be assessed and mitigated rather than treated as an overriding constraint where harm is limited and localised.
- 6.60 Paragraph 2.3.9 recognises the importance of proximity to connection and demand, supporting the rationale for co-locating renewable energy generation with energy-intensive infrastructure such as EV charging hubs.

Planning Practice Guidance

- 6.61 Planning Practice Guidance is a material consideration that provides further clarity on national policy. The PPG confirms that renewable energy development should be assessed on a site-specific basis, supported by proportionate technical evidence. It identifies landscape and visual effects as the principal consideration for solar development and confirms that such effects should be mitigated through careful siting, layout and landscaping.
- 6.62 The proposal is supported by a Landscape and Visual Impact Assessment which provides the appropriate evidence base for this assessment.

British Energy Security Strategy (April 2022)

- 6.63 The British Energy Security Strategy (April 2022) is a material consideration. The Strategy identifies renewable energy, including solar PV, as central to improving the UK’s energy security, reducing exposure to volatile international energy markets and supporting economic resilience. It recognises solar energy as one of the quickest and most cost-effective technologies to deploy at scale. The proposal contributes to the objectives of the Strategy by delivering domestic renewable electricity generation and reducing reliance on imported fossil fuels. Its role in supporting EV infrastructure further enhances its relevance to the Strategy’s ambition to electrify energy demand.

Powering up Britain: Main Summary, Net Zero Growth Plan and Energy Security Plan (March 2023)

- 6.64 The British Energy Security Strategy and the *Powering Up Britain* suite of documents are

material considerations that reinforce the strategic importance of domestic renewable energy. These documents identify solar energy as one of the fastest and cheapest forms of electricity generation and emphasise its role in supporting energy security, economic resilience and transport electrification. The proposal contributes positively to these objectives.

Net Zero Strategy: Build Back Greener (October 2021)

- 6.65 The UK Net Zero Strategy and legally binding climate change commitments are material considerations of significant and compelling weight. They confirm that rapid deployment of renewable energy and electrification of transport are essential pathways to achieving net zero. The proposal delivers benefits across both pathways.

Invest 2035: The UK's Modern Industrial Strategy (UK Government, June 2025)

- 6.66 The UK Net Zero Strategy and legally binding climate change commitments are material considerations of significant and compelling weight. They confirm that rapid deployment of renewable energy and electrification of transport are essential pathways to achieving net zero. The proposal delivers benefits across both pathways.

Land Use and Food Security Policy

- 6.67 The Government's Land Use Consultation (January 2025) and DEFRA Food Security reporting are material considerations. They recognise that food production can be maintained alongside the land use change required to meet net zero and environmental targets, and that renewable energy development and food security are not mutually exclusive objectives. This context is material to the assessment of the proposal.

A Climate for Change: Adaptation and the National Trust (2023)

- 6.68 *A Climate for Change: Adaptation and the National Trust (2023)* is a non-statutory but material consideration that reflects the growing consensus among land managers, conservation bodies and policymakers regarding the urgency of responding to climate change.
- 6.69 The document recognises climate change as one of the greatest long-term threats to landscapes, heritage assets and biodiversity. It makes clear that mitigation, alongside adaptation, is essential if valued landscapes are to be conserved for future generations. The report acknowledges that renewable energy development has a legitimate role to play in addressing the causes of climate change, provided impacts are carefully managed.
- 6.70 This perspective is material in demonstrating that responding to climate change is not in conflict with long-term landscape protection, but an essential component of it. The proposal contributes to climate change mitigation through renewable energy generation and supports the decarbonisation of transport, thereby aligning with the strategic intent of the report.

Cranborne Chase AONB Management Plan 2019 to 2024

- 6.71 The Cranborne Chase Area of Outstanding Natural Beauty Management Plan (2019–2024) is a material consideration. The Management Plan sets out the statutory purpose of conserving and enhancing the natural beauty of the AONB, but it also recognises climate change as a significant and growing threat to the landscape, its ecosystems and its cultural heritage. The Plan acknowledges the need to reduce greenhouse gas emissions and to support appropriate responses to climate change, including renewable energy, where these can be accommodated without undermining the AONB’s special qualities.
- 6.72 The Management Plan is not a development management document and does not impose a blanket restriction on renewable energy development. Instead, it supports a balanced approach, informed by site-specific assessment and careful design.
- 6.73 The proposal has been designed to respond to this context. As demonstrated by the accompanying Landscape and Visual Impact Assessment and ecological evidence, the development would not undermine the special qualities of the AONB and delivers benefits that are consistent with the Plan’s recognition of the need to address climate change.

Wiltshire Local Transport Plan 4

- 6.74 Wiltshire Local Transport Plan 4 (LTP4) is a material consideration. LTP4 sets out the Council’s strategy for delivering a more sustainable transport system, with a strong emphasis on reducing carbon emissions, improving air quality and supporting the transition to electric vehicles. It recognises the role of EV infrastructure in decarbonising transport and supporting economic activity, particularly along key transport corridors.
- 6.75 The proposal directly supports the objectives of LTP4 by enabling renewable energy generation to supply an operational EV charging hub serving the Strategic Road Network. This relationship strengthens the sustainability credentials of the wider transport infrastructure and supports Wiltshire’s transport decarbonisation objectives. The proposal therefore attracts positive weight in the context of the Local Transport Plan.

Wiltshire Renewable Energy Study Landscape Sensitivity Assessment 2023

- 6.76 The Council’s Landscape Sensitivity Study is a material consideration, but its role and weight in decision-making must be correctly understood.
- 6.77 The document includes a range of size bandings for solar installations:

2.6 The assessment judges the suitability of different scales of solar PV developments, based on bandings that reflect those that are most likely to be put forward by developers. The sizes used for the assessment are set out below:

- Very small solar PV installation: Up to 1 hectares
- Small solar PV installation: 1 to 5 hectares
- Medium solar PV installation: 5 to 20 hectares
- Large solar PV installation: 20 to 50 hectares
- Very large solar PV installation: 50 to 120 hectares

6.78 As a commercial solar developer we cannot agree with the comment highlighted in yellow. Our operations team have said that they have not habitually installed commercial sub-1MW schemes (the very small category above) for 15 years. This is not a surprise, the underlying approach and assumptions to these landscape sensitivity studies can be tracked back many years and is falling behind reality every year.

6.79 For the avoidance of doubt, we set out below how these size bandings approximate to MW outputs:

Category	Hectares (ha)	Megawatt (MW)
Very Small Solar PV	Up to 1 ha	Up to 0.99 MW
Small Solar PV	1 to 5 ha	1 to 4 MW
Medium Solar PV	5 to 20 ha	5 to 15 MW
Large Solar PV	20 to 50 ha	16 to 30 MW
Very Large Solar PV	50 to 120 ha	31 to 75 MW
—	120+ ha	76 to 99.9 MW

6.80 The document states:

2.7 Proposed solar PV developments larger than 120 hectares have not been considered in this assessment. Landscape sensitivity to these very large schemes would be categorised as “high” sensitivity regardless of location, requiring developers to pay particular attention to this issue in their specific applications.

6.81 That may have been acceptable back in 2023 when the document was published, the ‘very large’ category somewhat reflecting the maximum size of solar farm that could be dealt with under the s.78 TCPA system at that time. However, the s.78 TCPA system can now entertain solar farms up to 99.9MW, equivalent to 120ha+.

6.82 The document therefore starts with an unrealistic, uncommercial and out of date category, and ends with a category that is now unreflective, by an order of magnitude, of the size of applications that may soon be coming forwards.

6.83 This approach introduces negative bias and skews the Council’s approach to assessing ground mounted solar in landscape terms. It is unclear what the imperative is behind the document’s approach, it may simply be out of date and out of touch, but if the intention or outcome is/was to deter/resist the installation of schemes at the larger end of the categories, this undermines national policy.

6.84 Landscape sensitivity studies are, by their nature, strategic and high-level evidence documents. They are typically prepared to inform plan-making by identifying broad patterns

of sensitivity across large areas, rather than to determine the acceptability of individual development proposals. As such, they are not substitutes for site-specific assessment and cannot, in themselves, justify refusal of development.

- 6.85 This distinction is explicitly recognised in national planning policy and guidance, which requires planning applications to be assessed on their individual merits, supported by detailed and proportionate technical evidence. In this case, that evidence is provided through the Landscape and Visual Impact Assessment forming part of the Environmental Statement.

Methodological Limitations

- 6.86 Landscape sensitivity studies inevitably rely on generalised assumptions about development typologies and scales. As recent experience across multiple authorities demonstrates, these assumptions often struggle to keep pace with changes in technology, policy and delivery models for renewable energy development.
- 6.87 In particular, the categorisation of solar development by size within many sensitivity studies is increasingly outdated and misaligned with contemporary practice. Thresholds that may once have been appropriate no longer reflect the scale, efficiency, or operational realities of modern solar schemes, nor the Government's clear direction of travel towards significantly larger deployments under the TCPA regime.
- 6.88 Where development scales are defined in a way that compresses or exaggerates differences between schemes, there is a risk that conclusions on sensitivity become skewed, with a built-in bias against development that exceeds arbitrarily low thresholds. Such an approach does not reflect national policy, which requires local planning authorities to adopt a positive strategy for renewable energy and to maximise opportunities for delivery while addressing impacts appropriately.

Relationship to Site-Specific Assessment

- 6.89 The Landscape Sensitivity Study does not assess this site, its topography, its containment, its relationship to existing infrastructure, or the specific design, mitigation and landscaping proposals that form part of the application. It therefore cannot capture the nuanced factors that are central to understanding landscape and visual effects in this case.
- 6.90 By contrast, the submitted LVIA:
- assesses the proposal against the actual landscape character of the site and its surroundings,
 - considers visibility from identified receptors and representative viewpoints,
 - evaluates effects over time, including the establishment of mitigation planting,
 - and examines cumulative effects in the context of the consented EV hub and other existing infrastructure.

- 6.91 The LVIA is the primary and most reliable evidence for determining landscape and visual effects. Where its conclusions differ from the broad indications of a strategic sensitivity study, significantly greater weight should be afforded to the LVIA.

Development in Designated Landscapes

- 6.92 It is acknowledged that the site lies within the Cranborne Chase Area of Outstanding Natural Beauty and that great weight must be given to conserving and enhancing landscape and scenic beauty. However, neither national policy nor case law establishes a prohibition on

renewable energy development within designated landscapes.

- 6.93 The correct approach is one of careful assessment, balancing the statutory purpose of the AONB with the urgent and nationally significant need to deliver renewable energy infrastructure. The Landscape Sensitivity Study does not displace this balancing exercise, nor does it override the requirement to consider site-specific evidence and the particular circumstances of the proposal.
- 6.94 In this case, the LVIA demonstrates that the proposal's effects on landscape character and visual amenity are limited, localised and appropriately mitigated, and that the scheme does not undermine the special qualities of the AONB.

Weight in the Planning Balance

- 6.95 For the reasons set out above, the Council's Landscape Sensitivity Study should be afforded limited weight in the determination of this application. It provides background context but does not constitute a policy test, a development management tool, or a definitive assessment of acceptability.
- 6.96 The planning balance must instead be informed primarily by:
- the detailed findings of the LVIA and Environmental Statement,
 - the functional relationship between the solar array and the consented EV hub,
 - and the strong national policy support for renewable energy development in pursuit of net zero, energy security and sustainable transport.
- 6.97 When considered in this way, the Landscape Sensitivity Study does not identify any matter that would outweigh the significant benefits of the proposal or justify refusal.

Material Considerations Conclusion

- 6.98 Each of the material considerations above reinforces the same central themes:
- the urgency of responding to climate change;
 - the need to decarbonise both energy and transport;
 - the importance of supporting clean growth and a sustainable economy; and
 - the legitimacy of well-designed renewable energy development in sensitive landscapes where impacts are appropriately assessed and mitigated.
- 6.99 Taken together, they add further positive weight in favour of the proposal and do not identify any conflict that would outweigh its significant public benefits.

7. Planning Balance

- 7.1 In considering the weight that should be afforded to each consideration in the overall planning balance, we apply a scale of minor, moderate and significant in terms of benefits and disbenefits and a scale of minor, moderate and significant/substantial/great (which we interchange synonymously and as the NPPF prescribes).
- 7.2 In other words, significant/substantial/great are equivalent at the top of my scale, and the NPPF does not say otherwise. Indeed, with the incoming changes to the NPPF, we maintain

that there weighting terms can and always should have been used interchangeably.

Planning considerations weighing in favour of the scheme

The Need for Renewable Energy Generation

- 7.3 The scheme would supply 3MW to the EV hub, relieving the national grid by the same amount.
- 7.4 As explained above, there is an urgent and compelling need for this type of development and very strong policy support for solar development to help increase the supply of renewable energy.
- 7.5 The NPPF says that local plans should provide a positive strategy for energy that maximises the potential for suitable development and that plans should consider identifying suitable areas for renewable energy schemes. But that is a not a constraint to solar schemes that are tied to their end user.

Renewable energy provision					
Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

- 7.6 In reviewing appeal decisions and SoS decisions since summer 2024, we note that there is very clearly a consistent approach from the Secretary of State and appointed Inspectors in determining solar farm appeals over the last 2 years that either ‘substantial’ or ‘significant’ weight should be given to this benefit. This approach accords with the range of information stressing the urgent and significant need for additional renewable energy generation which we have set out above.
- 7.7 As we have identified above, The Clean Power 2030 Action plan is a key statement of policy from the Government. This includes an objective of creation of essential new energy industries as a key aspect of the overall economic growth plan, targeting specifically 45-47 GW of solar power by 2030.
- 7.8 The scheme would make a fast and locally valuable contribution to this by contributing to the energy demands of the EV hub, and relieving the local network of some of that demand, and this should be given significant (current NPPF) / substantial (incoming NPPF and trend within Inspector decisions) weight in the planning balance.
- 7.9 All parties are in agreement of the urgent need for renewable energy, and the significant or substantial weight that should be given to this scheme’s contribution to that increasingly urgent need.
- 7.10 Taking all the above into account, we are of the opinion that, due to the imperative to deliver renewable energy schemes which can assist in decarbonising the UK’s transport system, that the benefit of a 3MW solar farm to a leading EV charging hub is a significant benefit that should be afforded significant weight in favour of the grant of planning permission in this case.

Climate Emergency

7.11 Whilst the NPPF has been clear for many years now that applicant's need not demonstrate the overall need to renewable energy, we find it remains necessary to do with stakeholders and decision makers.

7.12 The following globally-notable people have said the following about the climate emergency:

- The *"biggest threat modern humans have ever faced"* (United Nations Press Release SC/14445, 23rd February 2021).
- *"Doubling the number of those [species] at risk of extinction"* (Nature, Research Highlights, 2nd June 2023) and *"Accelerating the Earth's sixth mass extinction"* (the Smithsonian, 30th April 2015).
- *"In the longer term dominating the top 10 risks global populations will face"* (World Economic Forum, Global Risks Report 2024).
- The *"biggest threat to global economy"* (United Nations, 14th January 2016). *"An existential threat"* (US President Joe Biden to the UN, July 2023).

Climate emergency				
Benefits	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
		Significant/ substantial/ great		
		Weight		

7.13 We also quote the following organisations closer to home on this topic:

- *"We are in a climate and biodiversity crisis. The science is absolutely clear that the impacts of climate change and biodiversity loss are happening now"* (The Landscape Institute 2020).
- *"We are in a climate and biodiversity crisis. The evidence of the multiple negative effects of climate change and biodiversity loss is clear, and humanity must take urgent, collective action to prevent global temperature rises and further ecosystem collapse"* (The Landscape Institute 2021).
- *"If urgent and large-scale action isn't taken to address climate change, we predict that more than 70 per cent of the places in our care will be at medium or high risk of climate-related hazards by 2060"* (Historic England 2022).
- *"The National Trust cares for more than 28,500 buildings across England, Wales and Northern Ireland, housing museum collections totalling over one million items. Over the long term climate change is likely to be the biggest threat they face"* (National Trust 2023).
- *"The threat of climate change is real, and time is running dangerously short. A resilient and sustainable future is achievable, but only if we act now"* (RTPI & TCPA 2023).
- *"If urgent and large-scale action isn't taken to address climate change, we predict that more than 70 per cent of the places in our care will be at medium or high risk of climate-related hazards by 2060"* (National Trust 2024).

7.14 A national climate emergency was declared by the UK Parliament April 2019.

- 7.15 At a local level, Wiltshire joined over 300 Local Authorities in England and voted to declare a climate emergency later in February 2019.
- 7.16 The scheme will contribute towards assessing these declarations of climate emergencies.
- 7.17 The Clean Power 2030 Action Plan is the latest statement of government underlining the objective of urgently delivering clean energy to limit our contribution to the damaging effects of climate change. The call to act with urgency adds to the weight which we consider would be accorded to the climate emergency.
- 7.18 By providing a positive, deliverable action on these statements of intent and incomparable quotations, we consider that the declaration of climate emergencies at both national and local level is a material consideration which should afford significant weight in the planning balance; and a contribution to transport decarbonisation in Wiltshire that is a significant benefit.

Energy Security

- 7.19 The scheme will supply the EV hub with power, relieving the National Grid, in accordance with the Government policy on energy security, set out in greatest detail in Powering Up Britain: Energy Security Plan 2023.

- 7.20 We consider that energy security should be regarded as a material consideration in its own right, one which is separate to the generation of renewable energy per se. This is because of its contribution to national security (reducing reliance on imported energy from volatile international sources). Renewable energy generation by virtue of its contribution to reducing carbon emissions

Energy security				
Benefits	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
		Significant/ substantial/ great		
		Weight		

and the drive to decarbonise the electricity system is a separate and distinct type of benefit i.e. there could be an energy security crisis without a climate crisis.

- 7.21 In this regard, we draw attention to the latest published version NPS EN-3 which, when setting the policy for Solar Photovoltaic Generation at Section 2.10, refers at paragraph 2.1.9 to solar playing a key part of the government's strategy for low-cost decarbonisation of the energy sector in the context of the net zero emission pathway to 2050; but then in a separate following paragraph 2.10.10 goes on to state that:

"Solar also has an important role in delivering the government's goals for greater energy independence ...".

- 7.22 In the Cutlers Green Lane appeal, in allowing an appeal for a solar farm the Inspector afforded substantial weight to the contribution the development would make to a low carbon economy and the provision of low cost and secure energy. Similarly, in the cases of Kemberton and Great Wheatley Farm the renewable energy benefit of the proposal in terms of its contribution towards energy security and resilience was afforded "*substantial weight*". The Southlands decision affords even greater weight to energy security, whereby the

Inspector states:

"There is an urgent need for renewable energy to mitigate the climate emergency, achieve net zero targets and enable energy security and lower energy bills. Together with the other benefits set out above, these matters weigh very substantially in favour of the development."

- 7.23 Given the clear importance of these government policy statements, we are firmly of the opinion that delivering energy security is both 'urgent' and of 'critical importance' to the country, and as such should be regarded as a significant benefit of this development which should be afforded significant weight in favour of the grant of planning permission in the planning balance.

Good Design

- 7.24 National design policy for all development is provided by the NPPF.

- 7.25 National design policy specifically for renewable and low carbon energy development is contributed to by NPS EN1 and EN3.

- 7.26 Both are material considerations.

- 7.27 The overall design and layout of the scheme has been designed from the outset to minimise harm within the site and wider area, whilst providing significant multiple benefits.

- 7.28 This positive approach to design chimes with that outlined in NPS EN-1, which, such is its importance in considering design, we think bears repeating here (my emphasis):

Good design and efficient use of land					
Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

"4.7 Criteria for good design for Energy Infrastructure

*4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But **high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object** – be it a building or other type of infrastructure – including fitness for purpose and sustainability, **is equally important.***

*4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic **as far as possible.** It is acknowledged, however that **the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.***

- 7.29 We have explained above, that a similar dynamic exists at the local level, with 'generic' design policy applicable to all forms of development provided in policies ENV1 and ENV10, and design policy specifically for renewable energy development in policy COM11.

- 7.30 In the local design policy tug of war we often find that the 'generic' design policies of local

plans are ill-suited to the particularities of renewable energy and that we find the policy written for the purpose to be far more useful in decision making.

- 7.31 The scheme will comprise good functional design, utilizing the latest technology including in this case bifacial panels (which can absorb light on both the ‘top’ surface and, to a lesser extent the underside), and the multiple land uses (pastoral farming and BNG) are an efficient use of land that has the added benefit of returning it to its current use in a better state than it is now.
- 7.32 We note that at the Honiley appeal the secretary of state and the Inspector considered that the use of efficient technology enabling efficient use of land would be accorded moderate weight in favour of the proposal.
- 7.33 The NPPF is clear that significant weight should be given to development which reflects local design policies. We remain content that the scheme complies with the design expectations of the local plan policy insofar as they can reasonably be applied, in the context of the national policy statements.
- 7.34 On the basis that, the scheme represents good design, this is a material consideration of at least moderate benefit to which we attach significant weight in favour of granting planning permission in this case.

Biodiversity and Net Gain

- 7.35 There is an ecological emergency and the UK is the most nature depleted countries in the world⁵. Responding to an emergency should be given significant weight in support, and we are not alone in thinking this. With regard to the weight recently attached at other solar PV appeals to net gains in excess of the 10% minimum, we note the following:
- Halse Road, Greatworth a net gain of 71% in habitat units and 33% in hedgerow units was attributed ‘significant weight’.
 - Bishops Itchington the level of BNG (which was unspecified) attracted ‘significant weight’.
 - Halloughton a net gain of 73% was given ‘significant weight’.

Biodiversity net gain					
Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

- 7.36 Going beyond the development statistics, the Journal of Nature has said that climate change is “*Doubling the number of [species] at risk of extinction*” and the Smithsonian has stated that climate change is “*Accelerating the Earth’s sixth mass extinction*”.
- 7.37 The Landscape Institute is clear that “*We all, individually and professionally, have a role to play in addressing this crisis*”.
- 7.38 The RTPI and TCPA are clear that “*We have three shared messages for planners and the wider*

⁵ [State of Nature 2023 - report on the UK’s current biodiversity](#)

community: 1 Ensure that tackling the climate crisis is at the heart of the vision for the future of our communities. 2 Recognise how vital planning is to securing that vision – both directly, through facilitating the extension of renewable energy generation, and strategically, through practical nature-based solutions and design actions that can promote sustainable travel, urban cooling, or natural flood defence. 3 Finally, recognise how many of the actions necessary to tackle the climate crisis are also key in creating healthy, ecologically rich, prosperous and beautiful places for us and for future generations”.

- 7.39 The State of Nature Report is very clear that “The UK distributions of 4,979 invertebrate species have on average decreased by 13% since 1970” and “Nature needs space to live and flourish, but around the globe we humans have decreased and diminished those spaces. This is especially the case in the UK. There are substantial negative consequences of living in a nature-depleted country. These include impacts on human health, and direct costs associated with adaptation to lost and damaged ecosystem services. For example, pollinating insects are worth millions of pounds to UK agriculture, and their population declines threaten food production” and “the UK is now one of the most nature-depleted countries on Earth”.
- 7.40 In the context of a biodiversity crisis, sometimes referred to as ‘the sixth mass extinction’, we give the benefits of exceeding BNG a significant level of benefit to which significant weight should be applied and we do not find doing so is overplaying the topic at all.

Green Infrastructure Benefits

- 7.41 We note the landscape mitigation and enhancement works proposed including infilled hedgerow planting, new hedgerow planting, orchard planting and enhancement of field margins.
- 7.42 Those measures would serve to create a more coherent landscape framework across the site which would deliver a number of minor (at the landscape scale) long-term benefits to which we give moderate weight.

Air Quality

- 7.43 Renewable energy reduces greenhouse gas emissions, which drive global warming, but are also harmful to human health more directly.
- 7.44 This is a clear minor benefit (measurable benefit) to which we apply moderate weight (because its human health).

Green infrastructure				
Benefits	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
		Significant/ substantial/ great		
		Weight		

Air quality				
Benefits	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
		Significant/ substantial/ great		
		Weight		

Farm Diversification

7.45 The scheme is a rural development that will benefit the landowner by diversifying income, and solar farms are now a common feature of the countryside across the UK.

7.46 We note that the NPPF confirms that planning decisions should enable the development and diversification of agricultural and other land based rural businesses.

7.47 It is widely acknowledged that farming is becoming less and less viable and when farmers are beginning to rely upon innovative farm diversification schemes to support and compliment traditional farming practices.

Farm diversification				
Benefits	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
		Significant/ substantial/ great		
		Weight		

7.48 The National Farmers Union see renewable energy as an important step towards making British agriculture carbon neutral within two decades, an important consideration as farming is responsible for around one tenth of UK greenhouse gas emissions.

7.49 We consider that the rural economic benefits delivered by the proposal in terms of farm diversification are of moderate extent (minimal benefit as part of the national picture but significant local benefit to the landowner and local rural economy) should in itself be granted moderate weight in favour of the grant of planning permission.

Economic Development

7.50 NPPF paragraph 85 states that: *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity".*

7.51 NPPF paragraph 87 is clear that: *"Planning policies and decisions should recognise and address the specific locational requirements of different sectors".*

7.52 The recent Bewley Homes judgement has clarified that this does not necessarily translate to a generic significant weighting to all economic development but requires justification.

Economic development				
Benefits	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
		Significant/ substantial/ great		
		Weight		

7.53 Economic development associated with renewable energy and sustainable transport goes far beyond the site-specific construction activities and includes the wider contribution that net zero industries make to the wider UK economy, including in the professional, design and engineering fields, as well as the indirect benefits of stabilised and secure domestic energy

production, and its onward benefit to energy costs.

- 7.54 We also contend that the vital nature of these considerations affords significant weight to be given in support of the economic development associated with renewable energy as a matter of principle when viewed through the prism of the government's aspirations for a **'green industrial revolution'**.
- 7.55 Footnote 43 to paragraph 85 of the NPPF directs the reader to *'Invest 2035: The UK's Modern Industrial Strategy'* which identifies **priority sectors for growth** which includes **'clean energy industries'**.
- 7.56 The Modern Industrial Strategy links to the UK's Clean Growth Strategy 2017. Both the Industrial and Clean Growth strategies link to the British Energy Security Strategy 2022, and beyond that to Powering Up Britain Net Zero Growth Plan.
- 7.57 Clean Power 2030 Action Plan 2024 (pages 20, 43 and 44) identifies significant beneficial impact for businesses from clean power, including price stability, market certainty encouraging investment and job opportunity. The Action Plan places the clean energy industries as a priority growth sector as part of the Government's Industrial Strategy. Clean energy is noted as creating employment and delivering price stability with is crucial for businesses.
- 7.58 Not only does the renewables industry generate significant revenue for the UK economy, but it is also an engine of green skills and education, and a key part of the government's wider strategy for economic recovery and onward green growth.
- 7.59 It follows that the weight to be given by decision makers to economic development generated by the renewables industry in support of sustainable transport and transport decarbonisation is significant, regardless of the size of the proposal, because even small-scale projects provide a valuable contribution to significantly cutting greenhouse gas emissions, boosting the green economy and upskilling the UK low carbon and renewable energy workforce.
- 7.60 In this case a moderate level of benefit accrues to the green economy which requires constant investment, innovation and support, to which significant weight should be applied.

BMV Land

- 7.61 The proposed use of the land for solar is for a temporary period associated with the operation of the EV hub, and can be associated with continued agricultural production through grazing, this will allow an improvement in soil through resting the land from intensive arable production and the regular application of fertilisers and pesticides, and will have no material impact on food production.
- 7.62 The proposal will not result in permanent or even temporary loss of BMV land for agriculture and the balance of harms and benefits discussed above falls to a minor level

BMV soil				
Benefits	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
		Weight		

of benefit to which we attribute a minor degree of weight in favour.

Planning consideration weighing against the scheme

BMV Policy

7.63 The NPPF paragraph 187 states “*Planning policies and decisions should contribute to and enhance the natural and local environment by: [amongst other things] b/ recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land*”.

7.64 The Wiltshire Core Strategy is clear that old saved local plan policy C19 is superseded by national policy and Core Policy 42 for stand alone renewable energy only requires BMV land to be “*taken into account*”.

BMV policy				
Harms	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
				Significant/ substantial/ great
		Weight		

7.65 The ALC grade of the solar site has been assessed as likely Grade 3a.

7.66 Whilst national policy and guidance emphasises the conservation of BMV land as a finite resource for the future and encourages the use of areas of poorer quality land in preference to those of higher quality, this BMV land will not be lost, it will be conserved for future generations because it will be returned to full agricultural use in the future in at least the same condition as it is now.

7.67 Therefore, on a very precautionary basis, one might say there is a minor level of harm to BMV policy imperatives, to which we only give minor weight because the harm, if there is any, is to policy, not the actual BMV soil reserve itself.

Effect on Landscape

7.68 The landscape is under threat from climate change. This is acknowledged by no less than the Landscape Institute, the RTPI and the TCPA. Whether this be by biodiversity and habitat loss, or unpredictable and potentially adverse changes to ‘English’ landscape character.

7.69 The submitted LVIA is clear that the impacts on landscape character are slight to moderate and that in relation to the AONB the changes are long term and experienced over an intermediate area resulting in an overall moderate adverse effect.

Landscape				
Harms	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
				Significant/ substantial/ great
		Weight		

- 7.70 We acknowledge the weight given to landscape conservation in the NPPF, and that this is often translated by decision makers into 'weight to harm'.
- 7.71 We note that harm arising from the proposal would diminish as the proposed landscape mitigation planting matures.
- 7.72 On this basis we assert a precautionary moderate level of harm to which we give great weight.

Effect on Visual Amenity

- 7.73 The submitted LVIA is clear that impacts to visual amenity range from major-moderate in views close to the site, to limited elsewhere.
- 7.74 We consider that these matters could be afforded great weight because the landscape is designated and the expectations of walkers might be higher than elsewhere. We also note that the development will often be regarded in the context of the A303, the EV hub and the electricity transmission wires that cross the site.
- 7.75 On these grounds the harm is reduced to moderate, and on a precautionary basis the from great to moderate.

Visual					
Harms	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

Heritage

- 7.76 The submitted heritage impact assessment, geophysical survey and archaeology desk based assessment are clear that if there is any impact to heritage, it is less than substantial and at the lower end of that range.
- 7.77 The NPPF gives substantial weight to conserving the historic environment which is often translated by decision makers into 'weight to harm'.
- 7.78 On a very precautionary basis we afford a limited level of harm to heritage, to which we apply substantial weight.

Heritage					
Harms	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

Planning consideration that are neutral in the balance

Highways and access

7.79 Access to the site is via the approved EV hub. The submitted Construction and Operation Transport Management Plan is clear that *“the Development is acceptable in transport terms and meets the local and national policy objectives. The COTMP demonstrates that there are no residual impacts in terms of highway safety or the operational capacity of the surrounding highway and transport networks and therefore planning permission should not be withheld on transport grounds”*.

7.80 We are therefore content that there is no harm to highways, traffic and transport. Indeed, using the existing access is a minor benefit. The overall highways implication is judged to be neutral.

Amenity

7.81 The submitted Glint and Glare report is clear that *“No significant impacts are predicted upon road safety, residential amenity and aviation activity. Mitigation is not recommended”*.

7.82 On that basis we are content that there are no amenity impacts and the implications to amenity are neutral.

Flood and drainage

7.83 The submitted drainage report is clear that:

- *The development is located fully within flood zone 1*
- *There are no watercourses on or adjacent to the site*
- *The site is at low risk of surface water flooding*
- *The site is at low risk of groundwater flooding*
- *The site soil will be appropriately managed during and post construction to maintain permeability and reduce the risk of increased runoff. As a precaution, a cut-off swale can be installed on the downhill side of the panels*

Highways and access					
Benefit/Harm	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
Weight					

Amenity					
Benefit/Harm	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
Weight					

Flood					
Benefit/Harm	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
Weight					

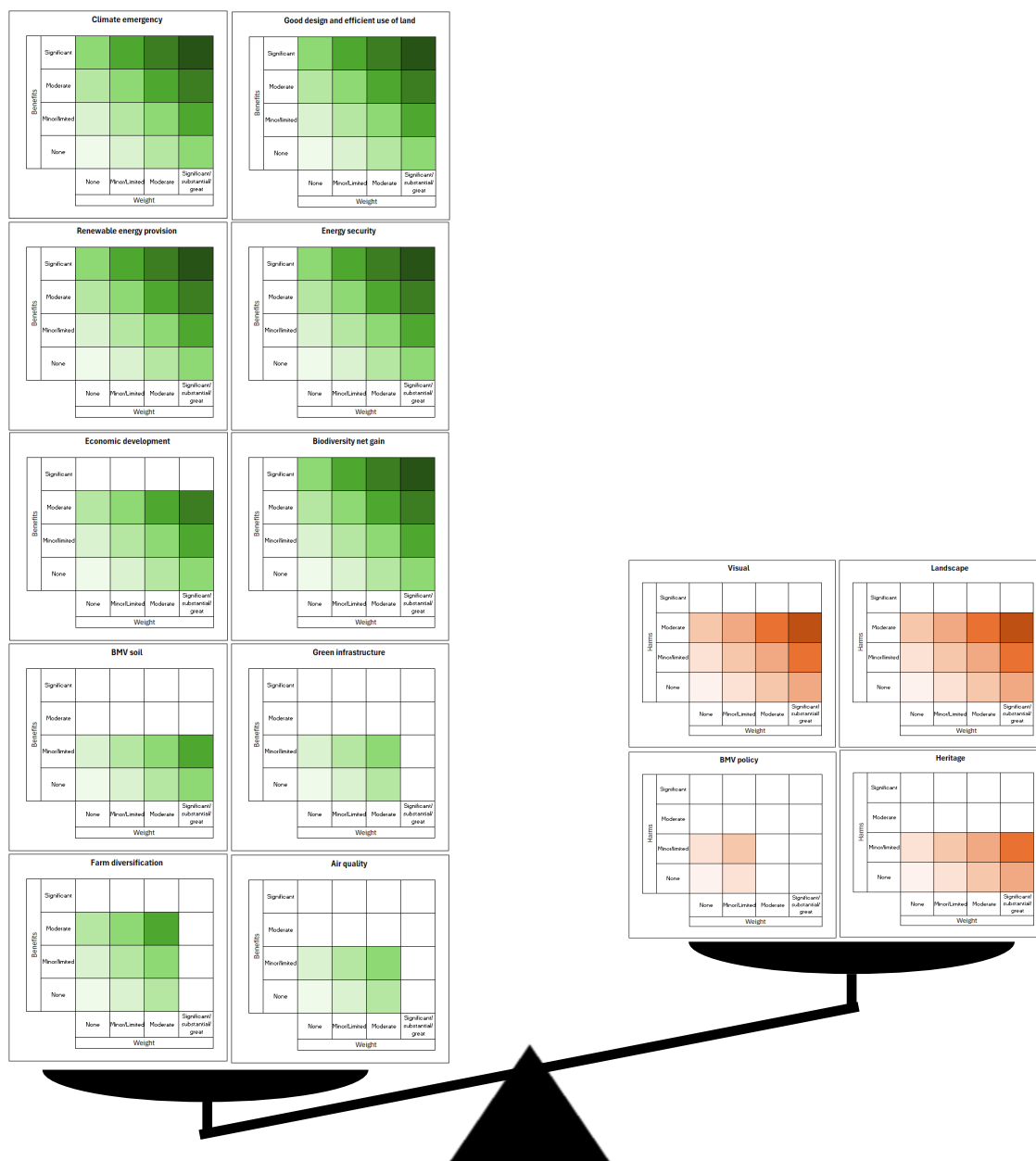
7.84 On this basis we are content that, on a very precautionary basis, there are very limited impact to flood and drainage, minor benefits if the site is actively managed for drainage (compared to its current unmanaged status) and overall the implications to flood and drainage are neutral.

Overall balance

7.85 The graphic below shows the overall balance of harms and benefits for this proposed development.

7.86 We are content that the overall balance weighs in favour of the grant of planning permission.

7.87 In addition, we contend that the conclusion of the Environmental Impact Assessment compels the grant of planning permission because it concludes that, overall, the best environmental outcome is the grant of planning permission because any adverse environmental impacts are outweighed by beneficial environmental impacts.



8. Conclusion

- 8.1 This Planning, Design and Access Statement has been prepared to support the submission of a planning application for a 3MW ground mounted solar array on land north of the A303, west of Chicklade, which will operate as a 'private-wire' scheme to supply renewable electricity directly to the adjacent consented InstaVolt EV charging hub.
- 8.2 The proposal represents a sustainable form of development which directly supports national and local objectives for tackling climate change, decarbonising transport, improving energy security and delivering clean growth. In accordance with national policy, significant weight should be given to the benefits of renewable energy generation and its contribution to a net zero future, and applicants should not be required to demonstrate the overall need for renewable energy development.
- 8.3 The application has been informed by an extensive suite of technical assessments, including an Environmental Statement due to the site's location within the Cranborne Chase Area of Outstanding Natural Beauty. Those assessments demonstrate that the development would not result in unacceptable impacts in relation to ecology, biodiversity, flood risk and drainage, heritage, highways and transport, or residential amenity. Where effects arise, they are capable of being appropriately mitigated through careful siting, design, landscape proposals and proportionate planning controls.
- 8.4 It is acknowledged that the development will give rise to landscape and visual effects, including a moderate adverse effect on the National Landscape and more pronounced effects in close-range views from nearby receptors. However, these effects are localised, time-limited to the operational life of the development, and reversible at decommissioning. They are also moderated through existing containment by landform and vegetation, and by the proposed landscape mitigation and habitat enhancements.
- 8.5 In contrast, the benefits of the scheme are significant. The proposal will deliver renewable electricity generation at source to support EV charging infrastructure on the Strategic Road Network, thereby reducing reliance on grid electricity and supporting the transition to low-carbon transport. It will also deliver substantial biodiversity net gain and longer-term environmental enhancements through habitat creation and improved land management.
- 8.6 When the proposal is assessed against the development plan and all other material considerations, the overall planning balance clearly weighs in favour of the grant of planning permission. The scheme is consistent with the statutory presumption in favour of sustainable development and represents an appropriate and policy-compliant response to the urgent need for renewable energy and transport decarbonisation.
- 8.7 Planning permission should therefore be granted.