

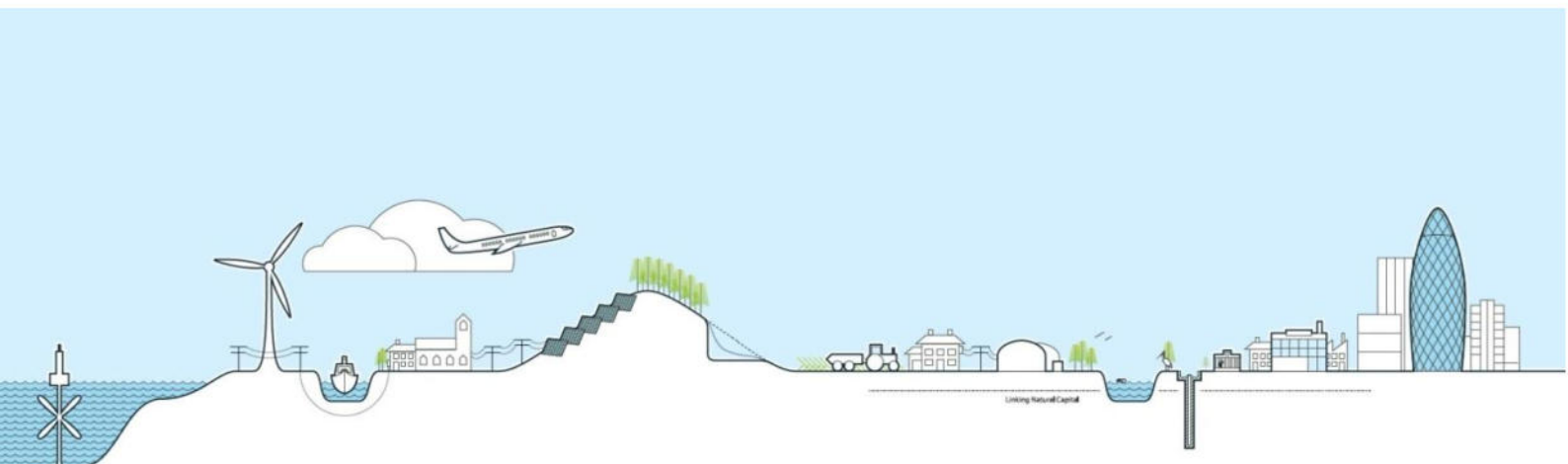
PLANNING STATEMENT

Accompanying a planning application for the proposed construction and operation of a ground mounted solar PV array together with all associated works, ancillary infrastructure and equipment, landscaping, biodiversity improvements and access

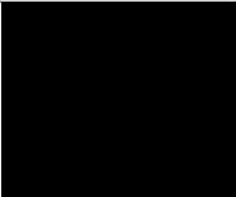
Land at Stourhead, Near Mere, Wiltshire, BA12 6QD

May 2026

Prepared By



Project Quality Control Sheet

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1 Introduction

This Planning Statement has been prepared by Aardvark EM Limited on behalf of National Trust for Places of Historic Interest or Natural Beauty (“The Applicant”) to accompany a full planning application to Wiltshire Council for the proposed construction and operation of a ground mounted solar PV array together with all associated works, ancillary infrastructure and equipment, landscaping, biodiversity improvements and access (“the Proposed Development”) on Land at Stourhead, Near Mere, Wiltshire, BA12 6QD (“the Site”).

The Proposed Development will generate renewable electricity to directly supply the National Trust’s buildings, visitor facilities and estate operations at Stourhead, significantly reducing reliance on fossil fuels, allowing future decarbonisation and supporting the Trust’s net zero ambitions by 2030. By replacing imported grid electricity with clean, locally generated power, the scheme will deliver measurable carbon savings, improve long-term energy security, and enhance the resilience of the estate’s operations. Any surplus electricity produced will be exported to the National Grid, contributing to the wider decarbonisation of the local distribution network.

There is an urgent requirement for renewable energy generation which the Proposed Development would help fulfil. National and Local Planning Policy is supportive of developments of this nature and there are no planning policies which would suggest that any planning application should be immediately refused, and care has been taken to establish a robust justification statement for the proposed development.

In accordance with the validation requirements set out by Wiltshire Council, this report sets out the planning policy context relating to the benefits and acceptability of the principle of the Proposed Development. They are assessed against the design principles and concepts that have been applied and how environmental issues relating to the proposed scheme have been addressed.

The presumption in favour of sustainable development flows through national policy to the local development plan. This proposal for a ground mounted array at Stourhead engages that presumption directly. The Proposed Development generates renewable energy, reduces the Trust’s dependence on fossil fuels, and delivers long-term environmental benefit, this is consistent with the objectives of both the NPPF and the development plan.

Whilst the Planning Statement can be read as a standalone document, it should be read in the context of the entire submission documentation in order to fully understand the Proposed Development, its potential effects and planning merits.

1.1 Application documents

The covering letter and planning application form for the Proposed Development (Document Ref: R001) are accompanied by the following documentation:

Document	Author	Reference
Covering letter	Aardvark EM Ltd	2536-R001
Design and Access Statement	Aardvark EM Ltd	2536-R002
Planning Statement	Aardvark EM Ltd	2536-R003
Submission Pack	Aardvark EM Ltd	2536-R004

EIA Screening Opinion	Wiltshire Council	PL/2025/09055
Pre-Application Response	Wiltshire Council	ENQ/2025/01883
Landscape and Visual Impact Assessment	Swan Paul	SPP/3417/doc.1
Agricultural Land Classification	Reading Agricultural Consultants	10868
Construction Traffic Management Plan	AWP	2032
Ecological Impact Assessment	Tyler Grange	18103_R02a_JS
Biodiversity Net Gain Statement	Tyler Grange	18103_R03a_JS
Flood Risk Assessment and Preliminary Drainage Strategy	RMA Associates	RMA-C2899
Glint & Glare Assessment	Neo Environmental	Glint & Glare Assessment
Noise Impact Assessment	Inacoustic	25-302
Heritage Impact Assessment	Headland Archaeology	P25-274

Table 1: Documents Comprising the Planning Application

The planning application drawings submitted in the Planning Application Drawing Pack are set out in Table 2 below:

Drawing title	Drawing Number/Reference
Location Plan	SP01 – Revision 06
Proposed Site Layout Plan	PL01 – Revision 06
Existing Site Layout Plan	PL00 – Revision 06
Distribution Board	SD01 – Revision 02
String Inverter	SD02 – Revision 02
PV Detail	SD03 – Revision 02
CCTV Camera	SD04 – Revision 02
Perimeter Fenceline	SD05 – Revision 02
Access Track	SD06 – Revision 02

Table 2: Planning Application Drawings

1.2 The Applicant

The Applicant, National Trust for Places of Historic Interest or Natural Beauty, is Europe's largest conservation charity, founded in 1895 to protect historic places, gardens, coastlines, and green spaces across England, Wales, and Northern Ireland.

The Applicant is committed to reducing its dependence on fossil fuels and contributing to climate change mitigation in line with its commitment to achieve net-zero carbon by 2030. Critically, the National Trust has committed to achieving this target through deep and rapid decarbonisation across its own operations and value chain. The proposed development reflects this philosophy in practice: rather than outsourcing its carbon reduction obligations, the Trust is demonstrating that decarbonisation can and should be delivered directly within its own estate. The deployment of renewable energy in this manner provides tangible leadership, showing that heritage and conservation landholdings are not a barrier to the energy transition but can play an active role within it. Long-term revenue savings generated by such installations are reinvested directly into conservation work, further aligning the proposed development with the Trust's broader charitable purpose.

1.3 Pre-Application Consultation

The Applicant has been committed to pre-application consultation and engagement with Wiltshire Council, the local community and key stakeholders throughout the application process. It recognises that good quality, pro-active pre-application discussions should lead to better informed planning applications and improved outcomes for all involved.

1.3.1 Pre-Application Planning Enquiry

Pre-application advice was published by Wiltshire Council on the 13 January 2026 ref ENQ/2025/01883.

The pre-application responses received include comments from the Conservation Officer, Landscape Officer, Highways Officer, County Ecologist, and LLFA.

The Council concluded that *“the proposals are acceptable in principle subject to Landscape and Visual Impact Assessment, Heritage Statement and Heritage Impact Assessment, consideration of the Public Rights of Way during construction and use, Construction Traffic Management Plan, BNG, Ecology report to cover protected species and habitats, Flood Risk Assessment and Drainage Strategy.”*

The design, environmental assessments, proposed mitigation, and documents submitted with this application directly address the pre-application responses received.

1.3.2 EIA Screening Opinion

A Request for a Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for the proposal was published by Wiltshire Council on the 12 December 2025.

It was *“the opinion of the Council that the development is not classified as EIA development”*.

1.3.3 Stakeholder Engagement – Pre-application

An initial stakeholder engagement event was held onsite at feasibility stage to introduce the emerging proposals. The event was attended by approximately 21 invited stakeholders, including representatives from the National Trust, Cranborne Chase National Landscape and Wiltshire Council.

It provided an opportunity to present early concepts and identify key constraints and opportunities associated with the Site.

A representative from Historic England was unable to attend the initial event; however, a separate 'Walk and Talk' session was subsequently held on 01st October 2025.

Stourton Parish Council was contacted at an early stage and invited to discuss the Proposed Development ahead of submission. The Parish Council indicated that they prefer to engage with planning proposals once a formal application has been submitted, which the project team has respected. The Parish Council has nonetheless been kept informed throughout the pre-application consultation process and will have the full opportunity to engage upon submission.

1.3.4 Local Community Engagement

A public consultation event was held over three days (12-14 January 2026). The event was publicised via social media and direct emails to stakeholders including the Cranbourne Chase National Landscape, Wiltshire Council, local residents and the Parish Council.

Eight consultation boards were prepared, presenting information on the Site; Proposed Development Layout; Key technical details; and Frequently Asked Questions. Members of the project team were present throughout the days to respond to queries and discuss the proposals. Approximately 50 individuals attended the event. Feedback was primarily received through direct discussion.

A focused engagement exercise was undertaken with residents of Bells Lane, in recognition of their proximity to the Site and potential interest in traffic-related matters. Residents were invited to attend an onsite meeting with the Project Manager, with consultation materials shared in advance. The session provided an opportunity to discuss the proposals in detail and respond to site-specific concerns.

1.4 Structure of the Planning Statement

The subsequent sections of this Planning Statement are organised into:

Scheme Overview and Proposed Development

This section summarises the existing uses and setting of the Site, together with a summary of the Proposed Development. It also identifies the designations applying to the site and surrounding area together with the relevant planning history. See also the Design and Access Statement for full details describing the Proposed Development.

The Need for Development

This section outlines the legislative context underpinning the need for, and importance of, the Proposed Development.

Policy Context

This section sets out the relevant national and local development plan policy, together with the applicable Supplementary Planning Guidance.

The Planning Appraisal

Here the planning considerations considered important to the determination of the Proposed Development are set out and explained in the context of the applicable planning policy outlined in Section 3.

Conclusions

This provides a concluding statement in terms of the Proposed Development and its planning merits.

2 Scheme Overview

2.1 The Existing Site

The Site, located at grid reference ST 776 336, lies within the administrative area of Wiltshire Council and is wholly situated within the parish of Stourton with Gasper.

Extending to 1.47 hectares, the Site forms part of the Stourhead National Trust Estate and is positioned to the south of the Stourhead Grade I Registered Park and Garden, with the boundary shown in yellow on the map below. The Site lies outside and to the south of the boundary of the Registered Park and Garden. The intervening ground between the Site and the registered landscape to the north is occupied by the estate farmyard complex and a belt of mature woodland. This woodland rises steeply on the northern slopes, falling away northward into the bowl of the ornamental lakes, a classic designed landscape feature characteristic of the Stourhead estate. The woodland therefore forms a strong and well-defined physical and visual barrier between the formal historic parkland and the more utilitarian agricultural character of the Site below.

The 1.47ha Site comprises approximately 1.3ha of poor modified grassland and 0.17 ha of Artificial unvegetated, unsealed surface (existing access track). It is enclosed by species-rich native hedgerows along the northern and eastern boundaries, with post and wire fencing defining the southern and western extents. Whilst agricultural in character, the Site forms part of a managed estate landscape which includes areas of existing development and visitor infrastructure.



Figure 1: Aerial Imagery 20 June 2024

A site-specific Agricultural Land Classification has identified the land as Grade 2, categorised as Best and Most Versatile (BMV) agricultural land. However, whilst the Site is identified as agricultural land, it is not currently subject to active agricultural cultivation and forms part of Trust's wider visitor estate. Furthermore, the Proposed Development is limited in scale and fully reversible, ensuring no permanent loss of agricultural land. In this context, the classification does not reflect the land's current

functional role or its contribution to agricultural production. Additionally, the Site will support agricultural use through sheep grazing as part of its long-term management.

The associated cable route is illustrated on the Proposed Site Layout Plan submitted in support of the application. This extends in a north easterly direction to connect to a ground mounted substation to be constructed by the Distribution Network Operator (SSE), located within the existing car park area adjacent to the visitor centre and restaurant. This substation will replace the existing pole-mounted transformer, reducing the visual effects of the grid infrastructure around the café area.

2.2 The Surrounding Area

The Site lies to the northwest of the town of Mere and the A303. The nearest residential properties are located along Bells Lane. The village of Zeals is located approximately 1.5 km to the south of the Site, with the villages of Bourton and Wolverton situated further to the south.

Land to the south of the Site is characterised by gently undulating topography and is predominantly in agricultural use, comprising a mix of arable farmland, dispersed farmsteads, and small clusters of residential properties. A former airfield to the south has been decommissioned and is currently subject to extensive woodland planting. Although this planting is at an early stage of establishment, it will, once matured, provide some visual screening of the Proposed Development from the surrounding area.

Within the wider landscape the land to the east of the site is gently undulating and falls away before rising to a similar level of the site roughly 3km from the site. The land to the west of the site rises and falls before rising significantly roughly 2km from the site. However, as a result of the land slightly rising immediately after its boundary and existing mature vegetation, the site will be screened from this elevated position.

2.2.1 Statutory landscape designations

The Site is located within the statutory designated Cranborne Chase & West Wiltshire Downs National Landscape (formerly Area of Outstanding Natural Beauty) with development guided by the still active Management Plan 2019-2024.

2.2.2 Planning Policy Designations

The Site is not impacted by any policy designations.

2.2.3 Ecology

There are no national or international designations within the site boundary. However, a detailed Ecological Impact Assessment accompanies the application.

2.2.3.1 Site of Special Scientific Interest

The Site is not registered as SSSI and has no ecological designations attached to it. Heath Farm Hill Site of Special Scientific Interest (SSSI) is located approximately 1.47 km to the west of the Site at its nearest point. Whilst the Site falls within the SSSI Impact Risk Zone, the Proposed Development does not trigger any of the consultation criteria set out by Natural England, and therefore formal consultation is not required. Whitesheet Hill SSSI lies approximately 2.25 km to the north-east and the Site does not fall within its associated Impact Risk Zone.

2.2.4 Heritage Assets

There are no designated heritage assets, conservation areas, registered parks and gardens or registered battlefields located within the Application area.

A desk-based Heritage Assessment has identified 138 designated heritage assets within 3 km of the proposed development area. These include 19 Scheduled Monuments, 115 listed buildings, 3 conservation areas, and the Stourhead Registered Park and Garden (which lies within 15m of the Site at its closest point). A further 145 individual records of non-designated heritage assets lie within the 1 km study area. A Heritage Impact Assessment has been submitted with the application.

2.2.5 Public Right of Way (PROW)

As shown within the submitted 'Existing Site Layout Plan' there are two Public Rights of Way (PROW's) located within the application boundary. Footpath STGA7 traverses the field to the north of the Site for approximately 225 metres, extending from the north-western corner to a central point along the western boundary. During the initial establishment phase of the proposed native hedgerow, there may be some limited visibility of the proposed solar array. The alignment of this route has been fully integrated into the scheme design, with a new hedgerow proposed between the PROW and the solar array to provide effective visual screening as it matures.

At the point of vehicular access into the field, the proposed access track will cross a short section of Footpath STGA7; this interaction will be appropriately managed to ensure the route remains open, safe and unobstructed as far as practicable during the construction period, with signage and localised surfacing measures implemented as required.

The proposed cable route runs from the solar array to the café substation, and in doing so must cross public footpath STGA7 at two locations where the footpath runs through the site. At each crossing point a short section of trench will be required to lay the cable beneath the path surface. These crossings represent the only points at which the footpath will be directly affected by construction activity; the remainder of the cable route does not interact with the public right of way.

At each crossing the trench will be excavated and reinstated in two halves, ensuring that at least half the path width remains passable at all times and that users of the footpath retain priority throughout. Works at each location are anticipated to take no more than a single morning. A banksman will be in attendance for the full duration of works at each crossing to manage the safe passage of footpath users and to pause construction activity where necessary to allow people to pass safely.

Should site conditions or the construction programme indicate that this approach is not practicable, the need for a temporary diversion will be reviewed with the Public Rights of Way Officer. If considered necessary, the relevant application will be submitted at least two months prior to the works taking place, with an appropriate and mutually agreed alternative route provided for the full duration of any temporary diversion.

Part of the proposed access route coincides with Footpath STGA16. It is confirmed that no permanent closure or diversion of STGA16 is proposed at any stage of the development. All potential effects associated with shared use of this route will be managed and mitigated through the Construction Traffic Management Plan (CTMP).

2.2.6 Flood Risk

The Environment Agency's Flood Map for Planning identifies the Site as lying entirely within Flood Zone 1 (low risk of flooding). Notwithstanding this, as a result of the site area, a Flood Risk Assessment and Surface Water Drainage Strategy have been prepared and submitted in support of the application.

2.3 Site Planning History

The following planning history is within the Proposed Site itself:

- 15/00648/FUL – Visitor car parks and access construction of circulatory road, relocation of caravan park, paving and steps, earthworks and tree and hedge planting. – Approved 15 June 2015

Several planning applications have been approved for works related to the visitor centre at the Stourhead National Trust Site to the northeast; however, these approvals are not relevant to the current proposal.

3 Proposed Development

The Application seeks permission following Proposed Development:

‘Proposed construction and operation of a ground mounted solar PV array together with all associated works, ancillary infrastructure and equipment, landscaping, biodiversity improvements and access.’

The Proposed Development covering 1.47 hectares, will generate renewable electricity for a temporary period of 40 years, to directly supply the National Trust’s buildings, visitor facilities and estate operations at Stourhead, significantly reducing reliance on fossil fuels and supporting the Trust’s net zero ambitions by 2030. By replacing imported grid electricity with clean, locally generated power, the scheme will deliver measurable carbon savings, improve long-term energy security, and enhance the resilience of the estate’s operations. Any surplus electricity produced will be exported to the local distribution network, contributing to the wider decarbonisation of the national energy supply.

At the end of the Proposed Development’s operational lifespan (40 years), the solar panels and other infrastructure would be removed and the Site restored to its existing use. The minimal ground intrusion involved in the construction of the facility means it is a straightforward process, and that the entire development is reversible, meaning it is temporary and not permanent development.

The temporary presence of the Development does not change the classification of the land from ‘greenfield’ to ‘brownfield’ (or ‘previously developed land’). This would be secured through a planning condition requiring the Site to be restored to its existing use following the cessation of energy generation activities. However, all boundary planting and biodiversity enhancement measures would be retained as lasting environmental benefits.

3.1 Site Design

The design of the proposed scheme is described in detail within the Design and Access Statement (2456-R002) that accompanies the application.

The Solar Site would include the following equipment (approximate):

- Solar photovoltaic (PV) panels, ground mounted onto a fixed frame orientated in a southerly direction;
- String Inverters;
- Perimeter deer type fencing and gates to enclose the panel area;
- Discrete security and monitoring CCTV/infra-red cameras mounted on fence posts along the perimeter of the fence. No external lighting will be included;
- Underground cabling to connect the panels to the proposed point of connection at the café and new substation;
- Landscaping planting; and biodiversity enhancements.

It is envisaged that the area under the panels will be used for low intensive sheep grazing during the site’s operational lifetime.

3.2 Access

A detailed Construction Traffic Management Plan, which details the proposed construction phase route has been submitted alongside this application.

Construction would take place over approximately c.8 weeks.

Access to the Site will be via the existing operational access to the estate from Bells Lane. All construction traffic will route along Bells Lane to the north to access High Street, before travelling south along the B3092. This will provide access to the A303 (T) for eastbound and westbound directions. Once off the public highway network, access will be achieved using existing field gateways and approximately 500 metres of established estate track.

It is estimated that during the main construction period (when construction traffic will be at its highest intensity) the Site will be accessed by approximately 8 HGV delivery vehicles per day, along with a small number of staff vehicle movements. Further detail is provided in the Construction Traffic Management Plan (CTMP), submitted with the application.

Construction workers start and finish times will be coordinated to avoid travel during the AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00). Construction workers will be encouraged to car share when accessing the Site. The level of traffic forecast during the temporary construction phase is therefore low and it is concluded that it will not have a material impact on the safety or operation of the local highway network.

Once operational, the array would generate very few traffic movements. Maintenance vehicles (likely to be a small van) will visit the Site approximately once a month. Maintenance vehicles will also access the Site using the existing access, utilised for the construction period.

3.3 Landscape and Biodiversity

Landscape and biodiversity mitigation proposals are incorporated into the scheme design and are detailed in the Landscape Visual Impact Assessment (LVIA).

The landscape and biodiversity mitigation proposals include measures that aim to avoid, reduce, or remedy potential impacts on the landscape and ecology. The design includes measures that will reduce the visual prominence of the solar arrays in local views by incorporating new hedgerows and enhancing the condition of key field boundaries on the perimeter of the Site, where necessary.

The proposals in the LVIA will secure the scheme's net biodiversity benefit. This is tested and set out in the Biodiversity Net Gain Assessment.

The proposed native hedgerow planting and landscape management would produce landscape features of the specified height and provide effective screening towards the Proposed Development within 7 years (medium-term). The proposed elements would also enhance the local landscape character.

The LVIA sets out how the Proposed Development would:

- Secure Biodiversity Net Gain greater than 10%;
- Protect and enhance the existing characteristics and features of value of the Site including the field structure, mature trees, hedgerows and ditches;
- Create a strong structural planting framework and protect, restore and maintain the existing vegetation network, which would also provide enhanced screening of close and middle distance views of the Proposed Development;
- Create greater opportunities for protected species' and species of conservation concern;
- Facilitate opportunities for visitor engagement and education with the natural environment and renewable energy;

- Secure the long-term future management of the Site for the duration of the Proposed development.

The Proposed Development is designed to have a 'light touch' in terms of its physical impact on the landscape, with, typically just 4% of the land within the red line boundary directly affected by the supporting structures for the modules and position of the associated infrastructure. The site layout utilises existing field access points, avoids hedge removal, and follows existing field boundaries to guide the design. The design approach has sought, at every stage, to minimise the effects of the Proposed Development on the character and appearance of the valued landscape. The Proposed Development will protect and strengthen existing natural features of the landscape. All trees and hedgerows on/around the Site would be retained and appropriate additional planting provided to fill gaps and deliver a net biodiversity gain to complement and enhance the flora and fauna characteristics of this area.

4 The Need for Development

This section summarises the principal and most up-to-date legislative framework underpinning the need for, and significance of, the Proposed Development.

National Government has long maintained a clear and continuing policy commitment to expanding renewable energy generation, including solar photovoltaic (PV) development, as part of the transition to a low-carbon economy.

The primary statutory basis for national decarbonisation is the Climate Change Act 2008, which built on earlier domestic and international climate commitments by establishing legally binding carbon reduction targets. This framework was strengthened by the Climate Change Act 2008 (2050 Target Amendment) Order 2019, which introduced a legally binding target for the UK to achieve net zero greenhouse gas emissions by 2050 relative to 1990 levels and remains the principal legislative driver of the transition to a low-carbon economy. This remains the overarching legislative driver of the transition to a low-carbon economy and provides the fundamental justification for renewable energy deployment across the country.

Government policy in support of renewable energy has developed progressively within this legislative framework. The UK Solar PV Strategy (2014), the Clean Growth Strategy (2017) and the 25 Year Environment Plan (2018) each contributed to establishing the policy direction for accelerated renewable energy deployment and environmental enhancement. These have since been reinforced and updated by the British Energy Security Strategy (2022) and Powering Up Britain (2023), which together set out the Government's ambition to significantly accelerate solar deployment as a core component of energy security and decarbonisation.

At the planning policy level, the National Planning Policy Framework provides strong in-principle support for renewable and low carbon energy. Paragraph 165 of the current NPPF makes clear that planning authorities should approve applications for renewable energy development where the impacts are, or can be made, acceptable. The Government's overarching position is that the need for renewable energy is established at the national level and is not a matter for re-determination at the local level.

The Proposed Development responds directly to these legislative and policy imperatives, contributing to the UK's statutory net zero commitment and the National Trust's own corporate target to achieve net zero carbon across its operations by 2030.

4.1 *National Climate Emergency*

UK renewable energy policy is focused on a number of key climate change objectives:

- reducing CO₂ emissions;
- promoting competitive energy markets;
- ensuring affordability for consumers;
- and securing decentralised energy supplies.

These objectives are consistent with the UK's broader international climate commitments, including its obligations under the Paris Agreement and the Climate Change Act 2008.

There is a significant body of international and national energy policy support for renewable and low carbon development. This support is rooted in the Government's policy of growing the economy in a decarbonising way and achieving its legally binding target of net-zero greenhouse gas emissions by

2050. The Government has set out a clear direction of travel, including the transition from a traditionally fossil fuel dependent economy to increasing amounts of secure, resilient renewable and low carbon energy. The commercial maturity of solar technology is recognised in national policy.

4.1.1 Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment report

The IPCC Sixth Assessment Report confirms, across multiple lines of scientific evidence, that climate change is occurring and is driven by anthropogenic influence.

Within an international context, the report concludes that human influence has unequivocally warmed the atmosphere, oceans and land, resulting in widespread and unprecedented changes across the global climate system. It identifies that climate change is already contributing to an increase in the frequency and severity of extreme weather events, including heatwaves, intense rainfall events, droughts and rising sea levels globally.

The report further states that global temperatures will continue to increase unless substantial and sustained reductions in CO₂ and other greenhouse gas emissions are achieved over coming decades. It concludes that limiting anthropogenic global warming will require achieving at least net zero CO₂ emissions, alongside rapid and sustained reductions in wider greenhouse gas emissions, with many climate-related impacts likely to become irreversible over the long term.

In a national context, the findings of the IPCC support the objectives underpinning UK renewable energy and net zero policy, including the accelerated deployment of low-carbon energy infrastructure required to support the transition to a decarbonised electricity system.

4.1.2 The Climate Change Act 2008 (2050 Target Amendment) Order 2019

The Climate Change Act 2008 introduced a legally binding target for the UK to reduce greenhouse gas emissions by at least 80% relative to 1990 levels by 2050.

The 2050 target amendment order 2019 strengthened this commitment by increasing the 2050 target from at least an 80% reduction to net zero greenhouse gas emissions relative to 1990 levels.

The intention is to achieve this target primarily through domestic action within the UK, rather than through the use of international carbon units (or 'credits'). Achieving net zero will demand significant and immediate investment in emerging technologies, alongside a strong focus on sustainable energy solutions and cleaner methods of power generation, including solar energy.

4.1.3 Overarching National Policy Statement for Energy (EN-1) (2025) and National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)

Overarching National Policy Statement for Energy (EN-1) is part of a suite of NPSs issued by the Secretary of State for Energy Security and Net Zero. In England the relevant NPS's may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended).

EN-1 establishes a critical and urgent national need for energy related development so individual applicants are not required to demonstrate need for the proposed infrastructure.

Alongside this, EN-1 also acknowledges that the development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative effects on biodiversity, landscape/visual amenity, and cultural heritage. However, the policy statement advises that in general, it should be possible to mitigate satisfactorily the most significant potential negative effects.

Paragraph 2.2.1 states that energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to manufacture goods; to produce and transport food; and to travel to work and for leisure. Our businesses and jobs rely on the use of energy. Energy is essential for the critical services we rely on – from hospitals to traffic lights and mobile devices. It is difficult to overestimate the extent to which our quality of life is dependent on adequate energy supplies. It is an essential foundation of our economy and society.

Making Britain a Clean Energy Superpower is one of the five missions set out by the UK government. The Clean Power 2030 Action Plan sets out the government's first major steps towards delivering our Clean Power 2030 Mission in partnership with the Scottish and Welsh governments, industry and the public. Meeting the Clean Power 2030 Mission objectives necessitates a significant investment in new energy infrastructure, both large nationally significant developments and smaller-scale developments determined at a local level (para 2.3.4).

EN-3 reaffirms that there is an urgent national need for new electricity generating capacity to meet the Government's energy security and net zero objectives. Section 2.10 of EN-3 identifies solar photovoltaic (PV) generation as a key component of the transition to a low carbon energy system, recognising solar as a cost-effective, flexible and rapidly deployable technology capable of making a substantial contribution towards decarbonisation and energy resilience.

The NPS confirms that site selection for solar development is influenced by a range of factors including irradiance, topography, environmental constraints and proximity to available grid capacity, which is recognised as a significant technical and commercial consideration. EN-3 also acknowledges that solar development may include associated infrastructure such as substations, cabling and energy storage.

Whilst applicants are encouraged, where possible, to utilise previously developed, brownfield and lower quality agricultural land, EN-3 confirms that the use of agricultural land, including Best and Most Versatile land, is not prohibited and should instead be assessed on a site-specific basis having regard to mitigation and the overall planning balance.

The NPS further recognises the temporary and reversible nature of solar development, with operational lifespans typically extending up to 40 years, after which sites can be decommissioned and restored where appropriate.

Overall, EN-3 establishes a strong policy basis and clear national need for the delivery of solar energy infrastructure.

4.2 UK Climate Emergency (2019)

In May 2019, the UK Parliament declared a climate emergency, calling on the Government to accelerate action on emissions reduction. This commitment was subsequently given statutory effect through the Climate Change Act 2008 (2050 Target Amendment) Order 2019, which amended the Climate Change Act 2008 to establish a legally binding target for the UK to achieve net zero greenhouse gas emissions by 2050.

4.2.1 Net Zero – The UK's contribution to stopping global warming advice report (May 2019)

The UK's declared National Climate Emergency was informed by the publication of this report, prepared by the Climate Change Committee which is an independent advisor to Government on these matters. It recommended the new emissions target for the UK of net-zero greenhouse gases by 2050.

The accompanying Net Zero Technical Report (May 2019) suggested the potential for 29-96 GW of onshore wind, 145-615 GW of solar power and 95-245 GW of offshore wind in the UK.

A number of findings were made in this report are relevant to the Proposed Development:

- Scenarios for 2030 and 2050 see variable renewables providing 50-75% of overall electrical energy production;
- Significant new renewable generation capacity is needed to accommodate rapid uptake of electric vehicles and hybrid heat pumps. Over the period to 2035, up to 35 GW onshore wind, 45 GW offshore wind and 54 GW of solar PV could be needed;
- The UK's onshore wind, offshore wind and solar PV resource are likely to be more than adequate to deliver an expanded and decarbonised electricity system to 2050

4.2.2 Energy Security Strategy (2022)

The Energy Security Strategy was published by the UK Government in April 2022 through the Department for Business, Energy and Industrial Strategy (BEIS). The document sets the direction for energy security policy. It provides a clear assessment of the UK's position, the risks the country faces, and the actions that are being taken.

The Strategy recognises that reducing reliance on fossil fuels depends on the rapid deployment of renewable energy technologies, including solar and wind power. It builds upon the Government's 'Ten Point Plan for a Green Industrial Revolution', which attracted significant private investment into renewable energy and low-carbon infrastructure.

The Strategy also seeks to ensure a more flexible, efficient system for both generators and users by encouraging all forms of flexibility with sufficient large-scale, electricity storage to balance the overall system by developing appropriate policy to enable investment.

4.2.3 NESO Clean Power 2030

The National Energy System Operator (NESO) published its Clean Power 2030 in November 2024, setting out the pathway required for Great Britain to achieve a predominantly clean electricity system by 2030. The report identifies a substantial increase in renewable energy generation as essential to meeting future electricity demand, reducing reliance on fossil fuel generation, and supporting the decarbonisation of the electricity sector.

As part of this transition, the report identifies the need for a significant expansion in solar photovoltaic (PV) capacity across the UK, increasing from approximately 15GW of installed capacity to 47GW by 2030. NESO identifies solar generation as a key component of the future electricity mix due to its contribution towards energy security, low-carbon electricity generation, and meeting growing electricity demand. The report also highlights the importance of complementary technologies, including battery energy storage, network reinforcement, and system flexibility, in supporting increased renewable deployment and maintaining network reliability.

4.2.4 Clean Power 2030 Action Plan: A new era of clean electricity (2024; updated 2025)

The UK Government's Clean Power 2030 Action Plan: A New Era of Clean Electricity, published in December 2024 by the Department for Energy Security and Net Zero (DESNZ), and subsequently updated in April 2025, sets out the Government's strategy for delivering a clean power system by 2030. The Action Plan establishes a framework for collaboration between government, industry,

investors, network operators, developers, trade unions, and other stakeholders to accelerate the deployment of low-carbon electricity infrastructure across the UK.

Successful delivery will require rapid deployment of new clean energy capacity across the whole of the UK. This includes 45-47 GW of solar power and 23-27 GW of battery capacity. The Action Plan outlines that accelerating clean infrastructure projects through the planning system is critical to achieving our goal and unleashing investment to support the Prime Minister's Growth Mission.

4.2.5 Progress in reducing emissions – 2025 report to Parliament

The Climate Change Committee published its 2025 Progress in Reducing Emissions Report to Parliament, assessing progress towards the UK's statutory climate targets and Net Zero commitments. The report concludes that whilst the UK has continued to reduce greenhouse gas emissions, delivery across a number of sectors remains too slow, and significantly greater deployment of low-carbon infrastructure is required over the next decade to remain on track.

The Committee highlights that decarbonisation of the electricity sector has been the UK's principal success to date, with electricity supply emissions now substantially lower than in previous decades due to the rapid growth of renewable energy generation and the phase out of coal-fired power. However, the report notes that continued and accelerated deployment of renewable energy infrastructure will be essential to support wider electrification across transport, buildings and industry.

The report identifies the expansion of low-carbon electricity generation as a critical national priority and emphasises the need for planning and infrastructure decisions to actively support the delivery of renewable energy projects. The Committee recommends that planning and development decisions should be aligned with Net Zero objectives and climate resilience requirements, whilst also enabling the timely delivery of clean energy infrastructure required to decarbonise the UK economy.

The Committee further highlights the importance of establishing a resilient and fully decarbonised electricity system through long-term investment in renewable generation, network infrastructure and energy system resilience. The proposed development would therefore align with the strategic direction of national climate policy by contributing towards the continued expansion of renewable electricity generation capacity identified by the Committee as necessary to achieve the UK's carbon reduction targets and Net Zero ambitions.

4.2.6 UK Solar Roadmap (June 2025)

The UK Solar Roadmap, published in June 2025 by the Department for Energy Security and Net Zero, presents the final outcomes of the Solar Taskforce and sets out a strategic framework to support the delivery of the Clean Power 2030 Action Plan.

The roadmap details a series of practical measures for both government and industry to overcome the challenges to delivering this ambition within the next five years while enhancing the UK's energy security. It further lays the foundation for sustained growth beyond 2030 and includes commitments to create high-quality employment opportunities as solar capacity increases.

The document states that achieving the upper target of 47GW of installed solar capacity by 2030 would require only 0.4% of the UK's land area and will generate enough electricity to power the equivalent of nine million homes while supporting up to 35,000 jobs within Great Britain.

To support delivery, a new joint government and industry body has been established named the 'Solar Council'. This regulatory body will oversee the implementation of the roadmap's 72 recommended

actions, track progress, and address regulatory and operational challenges to ensure the UK meets its solar deployment ambitions by 2030 and beyond.

4.3 Local Climate Emergency

In February 2019, Wiltshire Council formally acknowledged the climate emergency and committed to working towards making Wiltshire carbon neutral by 2030. In July 2019, the Council further committed to achieving carbon neutrality across its own operations by 2030.

To support these objectives, the Council adopted its Climate Strategy 2022–2027 in February 2022, establishing a framework for reducing emissions and increasing resilience to the effects of climate change across the county. The Strategy identifies energy generation, storage and distribution as key themes in facilitating the transition towards a low-carbon future and is intended to guide the preparation of future Council policies, plans and decision-making processes.

The Council subsequently published its Climate Delivery Plan 2025, which sets out the priority actions and measures required to implement the objectives of the Climate Strategy during the current delivery period.

Whilst these documents do not form part of the statutory development plan, they are material considerations in the determination of planning applications and provide clear local policy support for renewable energy development proposals within Wiltshire.

5 Planning Policy Context

The policy to be considered in the examination of the Proposed Development is set out in the overarching National Policy Statements for Energy EN-1 and EN-3, the National Planning Policy Framework (2024) and the Local Development Plan.

Consideration is also given in this section to Supplementary Planning Guidance as provided by the online Planning Policy Guidance and its advice on renewable and low carbon energy.

5.1 National Planning Policy

5.1.1 National Planning Policy Framework (December 2024)

The National Planning Policy Framework (December 2024) (NPPF) sets out the Government's planning policies for England and how these should be applied. At its core is the need for the planning system to contribute to the achievement of sustainable development – meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Paragraph 8 of the NPPF explains that achieving sustainable development means the planning system has three overarching and interdependent objectives:

- ***“an economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;***
- ***a social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being ; and***
- ***an environmental objective - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”***

The environmental objective in particular is applicable to renewable energy developments.

Paragraph 11 of the NPPF stipulates when determining planning applications, a presumption in favour of sustainable development should be applied and specifically:

“c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable*

locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”

Paragraph 12 underlines that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. The policies within the local development plan are considered below.

Section 6 of the NPPF refers to the economy and paragraph 85 in particular states that “Planning policies and decisions should help create the condition in which businesses can invest, expand and adapt ... The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.” Footnote 43 guides the reader to The Governments’ Industrial Strategy which identifies priority sectors for growth and support including ‘clean energy industries’.

Paragraph 88 considers support for a prosperous rural economy, and in particular support for planning policies and decisions that enable in inter alia:

“a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings

b) the development and diversification of agricultural and other land-based rural businesses”

This is continued in paragraph 89 in stating that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads.

Paragraph 105 states that planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Paragraph 116 directs that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

Paragraph 125 (a) states that planning policies and decisions should *“encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside.”*

Paragraph 131 states that good design is a key aspect of sustainable development. Paragraph 135 advises that planning policies and decisions should ensure developments function well and add to the overall quality of the area. They should be visually attractive as a result of good layout and appropriate and effective landscaping; be sympathetic to local character and history including landscape setting; and accommodate green space and be safe and accessible with a high standard of amenity and promoting health and well-being. Design quality should be considered throughout the evolution and assessment of development proposals (paragraph 137) and applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

Paragraph 161 sets out that 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.

Paragraph 163 states that the need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts.

Paragraph 166 states that local planning authorities should expect new development to:

- b) take account of landform, layout, building orientation, massing and landscaping.

Paragraph 168 sets out that when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should 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. Paragraph 168 also recognises that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.

Paragraph 170 sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Paragraph 181 directs that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere and that applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment it can be demonstrated that;

- a) *within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) *the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) *it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) *any residual risk can be safely managed; and*
- e) *safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

Paragraph 187 states that planning policies and decisions should contribute to and enhance the natural and local environment including by protecting and enhancing valued landscapes, recognising the intrinsic character and beauty of the countryside, by protecting and enhancing soils, minimising impacts on biodiversity and preventing new development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution.

Paragraph 188 of the NPPF goes on to describe that Plans should distinguish between the hierarchy of designated sites and allocate land with the least environmental value and footnote 65 states where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of higher quality.

Paragraph 190 of the NPPF states that when considering applications within National Landscapes permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of its need, feasibility to site the development outside of the designated area and any detrimental effect on the environment, the landscape and recreational opportunities.

Paragraph 192 sets out the principles that local planning authorities should apply with regard to habitats and biodiversity when determining planning applications including refusing applications where significant harm to biodiversity cannot be mitigated/compensated for; protecting SSSIs; refusing developments that result in the loss or deterioration of irreplaceable habitats unless there are wholly exceptional; and encouraging opportunities to incorporate biodiversity improvements especially where this can secure measurable net gains for biodiversity.

Paragraph 195 refers back to sustainable development in relation to appropriate assessment and states: ‘the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site’.

Paragraph 196 refers to planning decisions taking account of ground conditions and risks arising from land instability and contamination at sites. In relation to risks associated with land remediation account is to be taken of ‘potential impacts on the natural environment’ that arise from land remediation.

Paragraph 198 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

Paragraph 207 states that in determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should be consulted, and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 212 states that “*great weight*” should be given to the conservation of the significance of designated heritage assets and “*the more important the asset, the greater the weight should be*”. Paragraphs 200-203 set out the policy tests for different levels of harm to the significance of heritage assets of differing levels of importance.

The Glossary of the NPPF defines renewable and low carbon energy, including energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment including from the sun. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

5.1.2 Online Planning Practice Guidance

Planning Practice Guidance (PPG) was originally published in March 2012 with subsequent updates undertaken and published. The key aim of the Planning Practice Guidance is to provide easily accessible and understandable guidance on the implementation of the policies within the NPPF. It contains specific support in the form of online documents which are intended to change over time. The documents contain guidance on planning policies for renewables energy developments, Environmental Impact Assessment (EIA) and on how planning applications should be determined with regards to their impact on the natural and historic environment. Consideration of the fundamental aspects of this guidance in relation to the application are detailed below.

Renewable and Low Carbon Energy

The government remains committed to increasing the amount of energy from renewable and low carbon technologies to ensure that the UK has a secure energy supply, to slow down climate change and to stimulate new jobs and businesses so there is no change in direction of travel from the UK government.

The guidance provides further advice on renewable and low carbon energy projects to facilitate the delivery of a low carbon future, which is identified as a Core Planning Principle of the NPPF. There are several sections in the new PPG that are relevant to this application, however the guidance largely reiterates advice previously contained in “*Planning practice guidance for renewable and low carbon energy*” (July 2013), which has now been superseded by the PPG.

The PPG guidance on ‘Renewable and low carbon energy’ was first published on 18 June 2015 and last updated on 14 August 2023.

The guidance document offers the following statements and guidance (Paragraph: 013 Reference ID: 5-013-20150327);

“What are the particular planning considerations that relate to large scale ground-mounted solar photovoltaic farms?”

The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in very undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.

Particular factors a local planning authority will need to consider include:

- *encouraging the effective use of previously developed land, and if a proposal does involve greenfield land, that it allows for continued agricultural use and/or encourages biodiversity improvements around arrays;*
- *where a proposal involves greenfield land, whether*
 - I. *the proposed use of any agricultural land has been shown to be necessary and poor quality land has been used in preference to higher quality land; and*
 - II. *the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays;*
- *that solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use;*
- *the effect on landscape of glint and glare and on neighbouring uses and aircraft safety;*
- *the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;*
- *the need for, and impact of, security measures such as lights and fencing;*
- *great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large-scale solar farms on such assets. Depending on their scale, design and prominence,*

a large-scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset;

- *the potential to mitigate landscape and visual impacts through, for example, screening with native hedges; and*
- *the energy generating potential, which can vary for a number of reasons including, latitude and aspect.*

The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing the impact of wind turbines. However, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero.

Climate Change

The guidance on climate change compliments the NPPF and seeks to ensure that the planning system helps to implement the objectives of the Climate Change Act 2008 by radically reducing greenhouse gas emissions and adapting to the forecast impacts of climate change.

The guidance makes it clear that Councils need to take account of global climate change and should be using policy context that will help to address the challenges and issues that their area faces.

Natural Environment

The PPG guidance on 'Natural Environment' was updated in June 2025 to address how planning can take account of the quality of agricultural land and that an agricultural land classification assessing the quality of farmland can enable informed choices to be made about its future use within the planning system. Planning decisions should take account of the economic and other benefits of the best and most versatile agricultural land.

5.2 Local Planning Policy

The Site falls within the administrative area of Wiltshire Council, which acts as the Local Planning Authority for the determination of this application.

The Wiltshire Core Strategy Development Plan Document was formally adopted on 20 January 2015. The plan provides the overarching planning policy framework for Wiltshire for the period up to 2026. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

The Government requires Local Plans to be reviewed at least every five years. As such, Wiltshire Council undertook a review of its Core Strategy, referred to as the 'Local Plan Review'. However, following examination of the emerging plan, the appointed Inspectors set out two options: either to withdraw the Local Plan from examination or to proceed to a final report recommending non-adoption. At a meeting of full council on 19 May 2026 Councillors voted to withdraw the Wiltshire Local Plan Review from examination.

The withdrawal of the Wiltshire Local Plan Review does not alter the status of the adopted documents that currently comprise the Development Plan for Wiltshire. Although the Wiltshire Core Strategy was adopted in 2015 with a plan period extending to 2026, its policies are not automatically rendered out of date for decision making purposes and continue to provide an important framework for guiding development. Together with other adopted development plan policies, they remain the primary basis for the assessment and determination of planning applications.

5.2.1 Wiltshire Core Strategy (2015 - 2026)

The Wiltshire Core Strategy (adopted in 2015) establishes the spatial vision, strategic objectives, and overarching policies guiding development across Wiltshire to 2026.

The adopted core strategy covers the whole of the administrative area of Wiltshire Council, with the exception of the areas within the New Forest National Park, and it incorporates the South Wiltshire Core Strategy, thus replacing standalone versions of that document.

The Core Strategy identified six key strategic challenges:

- Economic Development;
- Climate Change;
- Providing New Homes;
- Planning for Resilient Communities;
- Environmental Quality; and
- Infrastructure.

A series of strategic objectives have been developed to deliver the vision for Wiltshire. The strategic objectives have been designed to marry up with the identified six key challenges:

- Strategic objective 1: Delivering a thriving economy
- Strategic objective 2: Addressing climate change
- Strategic objective 3: Providing everyone with access to a decent, affordable home
- Strategic objective 4: Helping to build resilient communities
- Strategic objective 5: Protecting and enhancing the natural, historic and built environment
- Strategic objective 6: Ensuring that adequate infrastructure is in place to support our communities

Though the Core Strategy should be considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

- Core Policy 1: Settlement Strategy;
- Core Policy 2: Delivery Strategy;
- Core Policy 3: Infrastructure Requirements;
- Core Policy 17: Mere 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 and Geodiversity;
- 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 60: Sustainable Transport;
- Core Policy 61: Transport & Development;
- Core Policy 62: Development Impacts on the Transport Network;
- Core Policy 64: Demand Management
- Core Policy 67: Flood Risk

5.2.2 Neighbourhood Development Plan

The Proposed Development is not situated within any 'made' neighbourhood plan area.

5.2.3 Wiltshire Climate Strategy (2022-2027)

The Wiltshire Climate Strategy (adopted in February 2022) establishes a framework to reduce greenhouse gas emissions, increase renewable energy generation and enhance climate resilience across the following seven key sectors: Transport; Built Environment; Waste; Green Economy; Energy Generation, Storage and Distribution; Natural Environment, Food and Farming; and Carbon Neutral Council. While the document does not provide a statutory framework it provides guidelines to influence key council strategies and plans such as the Local Transport Plan. As such, proposals that facilitate the generation and storage of clean energy are strongly aligned with the strategy's overarching objectives and its ambition to support a sustainable, low-carbon future for Wiltshire.

The Climate Strategy is currently supported by delivery plans and were first put in place in 2022 to set out the steps towards implementation of the strategy. The Carbon Neutral Council Plan 2022-24 and the Climate Strategy Delivery Plan 2022-24 were reviewed during 2024, both in terms of progress towards carbon reduction and climate adaptation outcomes and performance against the actions that the council committed to. An emerging Climate Delivery Plan (2025) will set out the focus for the council's action on climate change for 2025. Whilst this plan sets out priorities for one year, it also includes medium and longer-term implementation steps.

5.2.4 Cranborne Chase National Landscape Partnership Plan (2025 – 2030)

The National Landscape Management Plan is a statutory document that sets out the Partnership's policies for the management of the Cranborne Chase National Landscape. Whilst it does not establish land use planning policy, it provides an evidence base to inform policy preparation and decision-making, and its status as a formally prepared and reviewed document means it is a material consideration in planning matters. This position is reinforced within national guidance, with the National Planning Practice Guidance confirming that "AONB/National Landscape Management Plans may contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications." Accordingly, the Management Plan should be afforded weight in the determination of planning applications. The Applicant acknowledges this status and has engaged with the Cranborne Chase National Landscape Partnership Plan 2025–2030 as a material consideration throughout the preparation of the proposal. The Applicant does not seek to minimise or dismiss its relevance, and recognises that the weight to be attributed to the document is ultimately a matter for the decision-maker, having regard to all material considerations alongside the Development Plan, principally the Wiltshire Core Strategy (2015) and the National Planning Policy Framework (NPPF), which carries enhanced significance in the context of the withdrawal of Wiltshire's emerging Local Plan.

The 2025–2030 Management Plan states that “*large scale, commercial wind turbines or field-scale solar farms, are not appropriate in Cranborne Chase National Landscape*”. The document is complemented by Position Statement Number 9 on Field Scale Photovoltaic Panels, which clarifies what is meant by the term ‘Field Scale’ with the following descriptions:

- “*‘Field scale’ means hectares are committed to PVs rather than just a couple of dozen panels mounted on the ground. Furthermore, field scale PVs usually mean the output is in the ‘power station’ range of megawatts rather than kilowatts.*”
- “*It seems to the AONB that the primary use of a field that is covered with PVs is no longer agriculture but power generation.*”

Therefore, the proposal of a small section of the field to meet the agreed maximum AC export capacity of 400kW, would not constitute ‘field-scale’ solar in line with the definitions provided above.

The 2025–2030 Management Plan is also supported by Position Statement Number 5 on Renewable Energy, which recognises that renewable energy development can be acceptable where it is well-integrated with the landscape, non-intrusive in visual terms, and of an appropriate scale and siting (Policy PT14). This provides a clear framework to support ground-mounted solar arrays that are sensitively designed, demonstrating compatibility with local landscape character and supporting renewable energy objectives without causing undue visual or environmental harm.

Roof-mounted alternatives have been seriously considered but are precluded at the required scale by the roof space available, listed building status of the principal estate building and the constraints of the Registered Park and Garden setting; the ground-mounted option on the selected site is the only viable means of delivering meaningful on-site renewable energy without harming designated heritage assets. The site itself lies entirely outside the Registered Park and Garden, is physically separated from the designed landscape by rising wooded land, and is substantially screened by established hedgerows, the industrial character the policy seeks to avoid is not a feature of this proposal.

The Landscape and Visual Appraisal (Swan Paul Partnership Ltd, November 2025) provides the evidential basis for the balance of considerations. Across nine viewpoints within a 5km study area, the wider National Landscape is not materially harmed: the most sensitive elevated receptors at White Sheet Castle and Cross Dykes both record negligible to no operational impact, with the site screened by existing perimeter hedgerows and progressively enclosed by surrounding young woodland. The most significant visual effects are confined to users of public footpath STGA7 passing through the site, where construction-phase impacts reduce to slight/moderate adverse within four to five years as the proposed north screen hedge establishes; no viewpoint retains a substantial adverse impact at the operational stage. The site is assessed as having an average landscape value and low/medium susceptibility to change, displaying few of the National Landscape’s special characteristics. Against this evidence, the public interest case is compelling: the National Trust’s charitable purpose is the permanent preservation of places of historic interest and natural beauty for the benefit of the nation, and the energy savings from this installation will be reinvested directly into the conservation of Stourhead’s Grade I heritage assets, its Registered Park and Garden, and the habitats within the National Landscape itself. It would be paradoxical for the Partnership Plan to prohibit precisely the type of small-scale, estate-serving, well-screened renewable energy installation that its own climate change chapter calls for, delivered by a conservation charity whose purpose is the stewardship of the landscape the designation exists to protect. The applicant submits that the harm is localised, time-limited, and confined to a site of limited landscape value, while the public benefit is direct and quantifiable, and that this balance weighs clearly in favour of granting permission.

6 The Planning Appraisal

6.1 The Planning Balance

In determining an application for planning permission, a decision maker is required by Section 70(2) of the Town and Country Planning 1990 Act to have regard to the provisions of the Development Plan so far as they are material to the application. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that a determination “*must be in accordance with the plan unless material considerations indicate otherwise*”.

The Courts have determined that it is enough that a proposal accords with the Development Plan when considered as a whole. It is therefore not necessary to accord with each, and every policy contained within the Development Plan. Indeed, it is not at all unusual for Development Plan policies to pull in different directions.

The local development plan for the purposes of determining the Application, in so far as they are consistent with the NPPF (December 2024), are:

- Wiltshire Core Strategy (2015)

Other documents considered are:

- Cranborne Chase National Landscape Partnership Plan (2025 -2030)

The NPPF is a key material consideration. It holds a presumption in favour of sustainable development which states that for decision making this means “*approving development proposals that accord with an up to date development plan without delay*” (paragraph 11c) and in paragraph 12 reminds decision makers that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making.

This section contains a detailed analysis of the Proposed Development against the identified relevant national and local planning policies and other material planning considerations. In our view, the key issues for the determination of this Application are:

- Landscape and visual impacts;
- Biodiversity considerations;
- Climate Change;
- Drainage and Flood Risk;
- Heritage;
- Amenity; and
- Construction traffic impacts and site access

6.1.1 The Principle of Development

The Glossary of the NPPF defines renewable and low carbon energy, including energy for heating and cooling as well as generating electricity. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

The NPPF (paragraph 11) contains a presumption in favour of sustainable development – meeting the needs of the present without compromising the ability of future generations to meet their own needs (paragraph 7 of the NPPF).

NPPF Paragraph 161 sets out that the planning system should support the transition to net zero by 2050. It states that it should shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, and support renewable and low carbon energy and associated infrastructure.

NPPF Paragraph 166 states that local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply and to take account of landform, layout, building orientation, massing and landscaping.

With paragraph 168 concluding that when determining planning applications for renewable and low carbon development, local planning authorities should *“not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future”*

Wiltshire Core Strategy (2015) identifies how standalone renewable energy installations, of all types, will be encouraged and supported. Policy 42 establishes a clear criteria-based framework to encourage greater investment by the renewable energy industry within Wiltshire. The policy confirms that applicants are not required to justify the overall need for renewable energy development, either in a national or local context. However, proposals must demonstrate how impacts on key landscape, environmental and land use considerations factors have been satisfactorily assessed, including any cumulative effects.

While now withdrawn, the emerging Wiltshire Local Plan continued the approach detailed within the Core Strategy, supporting the development of renewable and low-carbon energy technologies across Wiltshire to help achieve national energy security and local climate objectives. Consistent with existing policy, proposals must demonstrate that all site-specific constraints, including cumulative impacts with other developments, have been satisfactorily resolved.

National policy is strongly supportive of renewable energy as a means of meeting our increasing energy demands, tackling climate change and transitioning to a prosperous and low carbon sustainable economy. Larger scale solar developments such as the Proposed Development are recognised as being not just necessary but central to meeting an urgent need and will assist to relegate the role of fossil fuels to being one of a back-up.

Nowhere in national or local policy is there a requirement to demonstrate the need for renewable energy development. The urgency of the need for substantially greater quantities of renewable energy (including large scale solar) is self-evident considering the recent dramatic step change in Government energy policy driven by its declared Climate Emergency to achieve a 100% reduction in greenhouse gas emissions by 2050 (Net Zero). This is a legally binding target.

The announced commitment by Government in October 2020 to raise its target for offshore wind capacity by 2030 from 30GW to 40GW demonstrates the urgency and scale of the necessary step change in switching from fossil fuels to renewables if Net Zero is to be achieved by 2050. On its own, even if it were to be delivered, this would not be sufficient to meet the need for additional renewable energy and reduce carbon emissions to the levels required by law.

In February 2019, Wiltshire Council acknowledged the climate emergency and committed to seek to make the county of Wiltshire carbon neutral by 2030. To this end, in July 2019 Wiltshire Council pledged as an organisation to become carbon neutral by 2030.

Making prudent use of natural resources is one of the Government’s four aims for sustainable development and is reflected in the objectives set out in joint local plan strategic objectives. It is therefore considered by the Council important for the Local Plan to contain policies, which help to secure a more efficient use of natural resources.

The Local Development Plan stresses that the promotion of renewable energy technology, subject to adequate mitigation of any adverse impacts, is supported by the Council. Relevant planning policy and guidance recognise that embracing climate change may require historic notions of urban design to be challenged.

The Proposed Development will generate renewable electricity to directly supply the National Trust's buildings, visitor facilities and estate operations at Stourhead, with any surplus exported for distribution to the local distribution network, contributing to the objective of sustainable development in accordance with NPPF paragraph 11, adopted Local Plan Framework and increasing renewable energy generation in accordance with NPPF paragraph 166. This is being provided at a time of a national and locally declared Climate Emergency.

In line with paragraph 190 of the NPPF, the public interest in this proposal is direct and quantifiable. The National Trust is a registered charity whose statutory purpose is the permanent preservation of places of historic interest and natural beauty for the benefit of the nation; it is not a commercial developer and the energy savings generated by this installation will be reinvested entirely into the conservation and maintenance of the charity's operations, i.e., the repair of listed structures, the management of the Grade I Registered Park and Garden, the maintenance of public access, and the stewardship of habitats within the National Landscape itself. At a site carrying an exceptional concentration of Grade I designations, every pound saved on energy costs is a pound directed to the conservation of the very assets the National Landscape designation and the planning system exist to protect, while every unit of renewable electricity generated contributes directly to the UK's legally binding net zero commitments. That public benefit, both financial and in terms of carbon, cannot be delivered through roof-mounted solar given the limited space, listed building constraints on the principal estate buildings. This modest ground-mounted installation on a well-screened, low-sensitivity site adjacent to existing visitor infrastructure is the only viable means of achieving it. The applicant submits that this is a public interest of significant weight that must be placed in the balance alongside the policy conflict.

The assessments accompanying the Application demonstrate that the Proposed Development would not give rise to significant adverse effects. In summary:

Landscape impacts have been assessed by Swan Paul Partnership Ltd (November 2025). The site is assessed as having average landscape value and low/medium susceptibility to this type of change. Construction phase impacts from the closest viewpoints on footpath STGA7 onsite are assessed as moderate/adverse, reducing to slight/moderate adverse in the operational phase as the proposed northern screen hedge matures. From all other viewpoints, including elevated positions within the National Landscape, impacts are assessed as slight to moderate at worst, reducing to slight or negligible over time as surrounding hedge planting establishes.

A significant biodiversity net gain would be delivered, 63.92% in habitat units and 37.49% in hedgerow units.

The site lies outside the boundary of Stourhead Gardens Grade I Registered Park and Garden. The southern edge of the park is heavily wooded, and the intervening visitor infrastructure further separates the site from the heritage designations. Designated heritage assets are therefore not predicted to experience any substantial detrimental change to their current condition as a result of the development.

A Glint and Glare Assessment prepared by Neo Environmental Ltd (November 2025) assessed 27 residential receptors, 30 road receptors and 23 aerodromes within the study area. No impact on residential receptors is predicted. Of the road receptors assessed, one receptor on the B3092 retains

a low impact after mitigation is considered, all others reduce to none. No impact on aviation assets is predicted, including Compton Abbas which was subject to detailed assessment. The overall conclusion is no significant effects.

In applying the relevant national and local planning policy, it is clear that the Proposed Development is of a suitable scale and design to be accommodated within the landscape and is consistent with the development plan taken as a whole. The assessments submitted with this application have identified no material harm across landscape and visual, heritage, ecological or other considerations, and there is no sound planning reason to refuse this application.

6.1.2 Climate Change

NPPF Paragraph 161 sets out that the planning system should support the transition to net Zero by 2050.

The inclusion of the Climate Change as a Key Challenge and Strategic Objective within the Adopted Core Strategy demonstrates the commitment of Wiltshire Council to address the Climate Emergency.

The Core Strategy aims to contribute to tackling climate change through a number of different areas of policy, including those specifically designed to address climate change (Strategic Objective 2). This specific chapter provides detailed policies aimed towards delivering sustainable construction, low-carbon energy, and standalone renewable energy schemes. These align with wider objectives in the Wiltshire Community Plan and national targets for significant carbon reduction and increased renewable energy generation.

Section 14 of the NPPF sets out, amongst other requirements, that Councils should not expect applicants to justify the need for renewable energy development (para.168a). Policy 42 of the Core Strategy confirms that applications for renewable energy development within Wiltshire are not required to justify the overall need for the proposal. This is because the renewable energy developments are recognised as providing a valuable contribution to cutting greenhouse gas emissions.

In accordance with the Flood Risk Assessments: Climate Change Allowances Guidance (2020), an annual increase in sea level should be added to current flood levels to account for climate change for the lifetime of the development. The higher central and upper end climate change allowances have been used to assess the possible future impact of climate change.

In this case, the proposed development will have an assumed operational lifetime of 40 years. Therefore, it is necessary to consider the flood levels of the site in the year 2066 with an appropriate allowance for climate change.

The Environment Agency's Flood Map for Planning confirms that the Site lies wholly within Flood Zone 1, defined as land at the lowest probability of flooding. Given the Site's elevation relative to nearby areas within Flood Zones 2 and 3, and its separation from these higher-risk areas, it is anticipated that the Site will remain within Flood Zone 1 for the duration of its operational life.

Furthermore, the research report "Hydrologic Response of Solar Farms" Cook and McCuen (2013) demonstrated that solar panels do not have a significant effect on runoff volumes, peaks or time to peak if grass cover is well maintained underneath panels and between rows. On this basis, the Proposed Development is not expected to adversely affect on-site hydrology or increase flood risk elsewhere.

6.1.3 Landscape

The NPPF sets out that good design is a key aspect of sustainable development. Paragraph 135 advises that planning policies and decisions should ensure developments function well and add to the overall quality of the area. They should be visually attractive as a result of good layout and appropriate and effective landscaping; be sympathetic to local character and history including landscape setting; and accommodate green space and be safe and accessible with a high standard of amenity promoting health and well-being. Design quality should be considered throughout the evolution and assessment of development proposals.

In NPPF section 15, 'Conserving and enhancing the natural environment', paragraph 187 sets out that '*Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;...'*

NPPF Paragraph 188 states that Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

'Core Policy 42: Standalone renewable energy installations' states that proposals for such development will be supported, provided they do not give rise to unacceptable landscape impacts, with particular regard to designated areas such as National Landscapes (formerly AONBs) and have due consideration to potential cumulative effects.

'Core Policy 51: Landscape' aims to ensure that proposed development will protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character. The policy attempts to achieve this by identifying the following aspects of the landscape character that should be conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies;
- The locally distinctive character of settlements and their landscape settings;
- The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe;
- Visually sensitive skylines, soils, geological and topographical features;
- Landscape features of cultural, historic and heritage value;
- Important views and visual amenity;
- Tranquillity and the need to protect against intrusion from light pollution, noise, and motion;
- Landscape functions including places to live, work, relax and recreate;
- Special qualities of Areas of Outstanding Natural Beauty (AONBs, (now National Landscapes)) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.

The Proposed Development has been carefully designed with a clear understanding of its location within the Cranborne Chase and West Wiltshire Downs National Landscape and its proximity to the Grade I Registered Park and Garden at Stourhead. The National Trust is acutely aware of the responsibility it bears as steward of some of England's most valued landscapes, and it is central to the Trust's approach that any renewable energy deployment on its estate is of a scale and design that is appropriate to its setting. The Proposed Development has been conceived with this principle at its core and as a genuine expression of the Trust's commitment to demonstrating that decarbonisation and landscape stewardship are complementary, not competing, objectives. The Landscape and Visual Appraisal identifies the site as a transitional area associated with existing visitor infrastructure, rather than a more sensitive or distinctive component of the designated landscape, providing a considered and appropriate location for an installation that will deliver material and tangible reductions in the Trust's carbon emissions at Stourhead.

The Site is well contained by existing hedgerows, woodland and vegetation, meaning it is not prominent or widely visible in the surrounding landscape. Visibility is largely restricted to localised views, particularly from Public Footpath STGA7, and there are many areas where visibility is less than the Zone of Theoretical Visibility suggests.

The scheme incorporates mitigation measures including the retention and enhancement of hedgerows, new native planting, and grassland habitat improvements around the solar array, helping integrate the development into the surrounding landscape. The appraisal concludes that the site has a low/medium susceptibility to this form of development due to its contained nature, proximity to existing visitor infrastructure, and limited presence of key National Landscape characteristics. In addition, the wooded southern edge of Stourhead Gardens prevents direct views from within the Grade I Registered Park and Garden. Overall, the Proposed Development would remain well contained within the existing landscape framework and would not result in substantial harm to the character or scenic quality of the National Landscape.

The Proposed Development is therefore considered to accord with the landscape and visual policies of the Cranborne Chase National Landscape Partnership Plan (2025–2030) and the relevant policies of the Wiltshire Core Strategy, which together require that development within and affecting the National Landscape conserves and enhances its special qualities and is appropriate in scale, siting and design to its context. The proposal satisfies these requirements and is supported on landscape and visual grounds.

6.1.4 Heritage

NPPF Paragraph 207 states that in determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should be consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 208 sets out that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal

on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

NPPF Paragraph 212 states that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Impacts upon the setting of heritage assets in the area surrounding the site may occur during the construction and operation of the development as a result of visual or other sensory changes (such as noise, light and movement) within their settings, such that our ability to appreciate the significance of the asset as adversely (or beneficially) affected.

'Core Policy 58: Ensuring the conservation of the historic environment' reiterates that proposed development should protect, conserve and where possible enhance the historic environment. It places strong emphasis on safeguarding designated heritage assets, such as listed buildings, conservation areas, archaeological remains, historic parks and gardens, and battlefields, along with their settings, in a manner proportionate to their significance.

The policy also recognises the importance of non-designated heritage assets in contributing to local character and identity, encouraging their conservation and sensitive enhancement where appropriate. Proposals that deliver wider social, cultural, economic, and environmental benefits through the historic environment are supported, provided this aligns with high-quality design principles.

Additionally, the policy promotes the improvement of heritage assets at risk, encouraging development that secures their preservation, with input from relevant statutory and local consultees.

'Core Policy 42: Standalone renewable energy installations' confirms that such proposals will be supported where they appropriately consider the historic environment and ensure that no unacceptable harm is caused to heritage assets or their settings.

A desk-based assessment, walkover survey and site visits have been undertaken to establish the heritage baseline and assess potential effects.

A desk-based Heritage Assessment has identified 138 designated heritage assets within 3 km of the proposed development area. These include 19 Scheduled Monuments, 115 listed buildings, 3 conservation areas, and the Stourhead Registered Park and Garden (which lies within 15m of the Site at its closest point). A further 145 individual records of non-designated heritage assets lie within the 1 km study area.

Notwithstanding the proximity and importance of these assets, the Heritage Assessment concludes that the Proposed Development would not give rise to any adverse effects on the significance of any heritage asset, including through impacts on setting. This conclusion reflects the contained nature of the site, the screening provided by existing vegetation and the wooded southern edge of Stourhead Gardens, and the careful siting of the arrays to avoid intervisibility with key heritage assets.

The Proposed Development therefore accords with NPPF, Core Policy 58 and Core Policy 42, and is supported on heritage grounds.

6.1.5 Residential Amenity

NPPF Paragraph 198 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

'Core Policy 42: Standalone renewable energy installations' states that proposals either individually or cumulatively, should consider their impact on residential amenity, including noise, odour, visual

amenity and safety to ensure that the proposal will not result in adverse impacts on the amenity of occupiers and neighbours.

There are no residential properties that would experience views of the development once constructed. However, the proposed construction access route has the potential to affect nearby dwellings. As such, the application will be supported by a Construction Traffic Management Plan (CTMP), that provides a detailed review and mitigation measures to ensure the proposal will not have an adverse impact on the amenity of occupiers and neighbours.

Overall, therefore the Proposed Development is acceptable in amenity terms and meets the requirements of the NPPF and Local Plan Policy. Planning permission should therefore not be withheld for this reason.

6.1.5.1 Noise

A Noise Impact Assessment has been produced by Inacoustic Ltd to accompany the Application. The assessment considers the potential noise generation from the plant associated with the Proposed Development with respect to existing sound levels in the area.

The Noise Impact Assessment included the proposed construction of a ground-mounted substation to replace the existing pole-mounted transformer. Although this element will now be delivered separately by the Distribution Network Operator (SSE), rather than as part of the proposed development, it was considered appropriate to retain its assessment in order to present the full extent of any potential impacts.

The assessment methodology contained in British Standard 4142:2014+A1:2019 Method for rating and assessing industrial and commercial sound has been used in conjunction with supplementary acoustic guidance.

The assessment identifies that the Proposed Development will give rise to sound impacts that would be within the range of NOAEL (No Observed Adverse Effect Level) of the PPG.

For ease of reference, the definition is reproduced below:

“Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the acoustic character of the area but not such that there is a change in the quality of life.”

Accordingly, the amenity of the nearest sensitive receptors, namely the caravan parking area associated with the wider Stourhead Estate to the north of the site, would not be adversely affected by noise arising from the Proposed Development.

Noise and disturbance during construction would be mitigated by the mitigation measures outlined in the submitted Construction Traffic Management Plan (CTMP). The Proposed Development is therefore considered acceptable on highways and access grounds and accords with the relevant policies of the development plan in this regard and planning permission should therefore not be withheld for this reason.

6.1.5.2 Glint and Glare

Solar panels comprise photovoltaic cells encased in glass with an anti-reflective coating. Unlike polished or mirrored surfaces, modern solar panel glass is specifically engineered to minimise reflection and maximise light absorption. The result is an object that is perceived to have very little glare.

Nonetheless, and for the purposes of completeness, a Glint and Glare Assessment has been prepared by Neo Environmental and submitted with the application. The assessment considers the possible effects of reflected light upon surrounding receptors, including road users, residential dwellings, and users of the Public Rights of Way network in the vicinity of the Site.

The assessment concludes that:

- No impact on residential or PRow receptors is predicted.
- Solar reflections are possible at four of the 20 road receptors assessed within the 1km study area. Initial impacts were Low at four receptors and None at the remaining 16 receptors. Upon reviewing the actual visibility of the receptors, glint and glare impacts remain Low at one receptor and reduce to None at all remaining receptors. Once mitigation measures were considered, impacts reduce to None at all receptors.
- No impact on aviation assets is predicted.

Following the proposed mitigation, the effects of glint and glare and their impact on local receptors is predicted to only be Low and None, and therefore No Significant Effects.

The Proposed Development is therefore considered acceptable on these grounds and accords with the relevant policies of the development plan in this regard and planning permission should therefore not be withheld for this reason.

6.1.6 Flood Risk

NPPF Paragraph 170 sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Paragraph 181 directs that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere and that applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment it can be demonstrated that;

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes.

Core Policy 67: Flood Risk while focussing on Residential development does stipulate that all new development must include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

The requirements for Flood Risk Assessment (FRA) are provided in the NPPF (as outlined above) and its associated Planning Practice Guidance, together with the Local Development Plan and Environment Agency's Guidance Notes. This policy and associated guidance have been followed in the preparation of the FRA.

The EA's flood map for planning indicates that the site is located entirely within Flood Zone 1. Based on the distance between the site and the land located within Flood Zones 2 and 3 and that the site is elevated higher than these extents, the site will remain in Flood Zone 1 for its operational lifetime (assumed to be 40 years).

Site access and egress is via an existing private road located in the central part of the site connecting on to Bells Lane. The proposed access/egress route is located entirely within fluvial Flood Zone 1 (low risk), however there is an area classed as 'low' risk of surface water flooding with a flood warning of very low hazard. On this basis, it is concluded that future users of the development would be safe during the design flood event for the operational lifetime of the development.

It is not considered necessary to provide SuDS for the proposed solar panel arrays. The research report "Hydrologic Response of Solar Farms" Cook and McCuen (2013) (see FRA) demonstrated that solar panels do not have a significant effect on runoff volumes, peaks or time to peak if grass cover is well maintained underneath panels and between rows. Therefore, it is proposed to implement a planting framework and maintain the grass cover to prevent areas of bare ground and erosion occurring.

The development should therefore be considered acceptable in planning policy terms. Planning permission should therefore not be withheld for this reason.

6.1.7 Biodiversity

NPPF Paragraph 187 states that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and preventing new development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air or noise pollution.

NPPF Paragraph 192 sets out the principles that local planning authorities should apply with regard to habitats and biodiversity when determining application including identifying and pursuing opportunities for securing measurable net gains for biodiversity.

NPPF Paragraph 193 sets out the principles that local planning authorities should apply with regard to habitats and biodiversity when determining planning applications including refusing applications where significant harm to biodiversity cannot be mitigated/compensated for; protecting SSSIs; refusing developments that result in the loss or deterioration of irreplaceable habitats unless there are wholly exceptional; and encouraging opportunities to incorporate biodiversity improvements especially where this can secure measurable gains for biodiversity.

'Core Policy 50: Biodiversity and Geodiversity' requires development to protect and, where possible, enhance biodiversity and geodiversity. Proposals must retain and safeguard ecological and geological features, ensuring their long-term management, connectivity, and functionality. Where harm is unavoidable, impacts must be minimised and appropriately mitigated, with compensation secured to achieve no net loss of biodiversity and maintain ecological networks.

The policy also requires developments to avoid disturbance to sensitive species and habitats, and to ensure no adverse effects on designated sites, particularly European (Natura 2000) sites, where impacts must be fully avoided or mitigated.

In addition to protection, all development should seek opportunities for biodiversity enhancement, with major schemes expected to deliver measurable gains through habitat creation, restoration, and strengthened ecological networks. Impacts on local sites should be avoided wherever possible, with harm only permitted in exceptional circumstances where it is justified, mitigated, and compensated, alongside contributions to their long-term management.

During the construction phase, there are predictable effects which are generally unavoidable; many are short term and can be minimised as part of the construction management, but some have the potential for more lasting effect. The potential for adverse effects, are largely short-term impacts associated with noise and vibration, airborne and waterborne, pollutants, short term habitat loss or disturbance. The potential for adverse impacts will be minimised as far as possible through the application of good practice techniques and adherence to well-designed method statements; these will be managed effectively through a Construction Environmental Management Plan (CEMP).

However, the development will primarily affect habitats of negligible ecological importance, namely modified grassland and developed land, and no permanent loss of any habitat is required to facilitate the proposal. Habitat creation and enhancement at the Site, comprising new species - rich hedgerow planting and grassland enhancement, will provide increased ecological importance of such habitats and additional opportunities for biodiversity within the site. As a result, no impacts to any protected species are anticipated and no impacts to any designated sites are anticipated.

BNG became mandatory in February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Applicants must therefore deliver a BNG of 10% as part of their development proposals to deliver a measurably impact. The gains must be calculated using the statutory (official) biodiversity metric. The BNG metrics are used to calculate the total biodiversity units for each habitat category present, and the required gain must be achieved for each.

The Applicant has designed the scheme and landscape mitigation proposals such that biodiversity would be significantly improved. When assessed using the latest DEFRA BNG metric and undertaken by a suitably qualified experienced ecologist, this predicts a 63.92% habitat biodiversity net gain, 37.49% hedgerow biodiversity net gain could be achieved because of the proposal.

In line with planning guidance, a Biodiversity Net Gain Strategy is submitted with the application detailing how the post-development biodiversity values of the site will be secured, managed, enhanced and monitored to maximise opportunities for local nature recovery. This plan, to be secured by the mandatory BNG condition, will commit the Applicant to delivering above the mandatory 10% as part of the proposals for a minimum period of 30 years from the completion of the habitat creation. This is above the local plan policy and mandatory requirements under legislation whilst allowing for headroom for any habitat failure/replacement or any further future requirements associated with BNG regulations during the 30-year monitoring period.

The Proposed Development therefore accords with the biodiversity and ecological policies of the NPPF, the Environment Act 2021 and the relevant policies of the Wiltshire Core Strategy, and is supported on ecological grounds.

6.1.8 Highways, Traffic and Access

NPPF Paragraph 116 directs that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Similarly, Local Plan Policy 27: Transport and accessibility states that all development should provide safe and suitable access for all people and not cause a significantly adverse impact on the local or strategic road network that cannot be mitigated or managed.

Core Policy 62 provides a framework for assessing development impacts on the transport network. The policy details that developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.

A Construction Traffic Management Plan (CTMP) has been prepared by AWP and accompanies the Application. This explains in detail the proposed Site access points, vehicle movements and the construction vehicle route from the strategic highway network to the Site.

During the construction phase the solar panels and racking will be delivered on articulated vehicles. Deliveries to the Site will be reported to the Site Manager and will be made by the smallest possible vehicle for that particular item of plant or material. Purchasing will be programmed to reduce the number of loads, so efficiencies and impacts can be reduced further.

Construction vehicles will utilise the existing operational access to the estate from Bells Lane. The full access arrangement is shown in the appendices of the CTMP.

Once operational, Solar Farm developments generate very few traffic movements. Maintenance vehicles (likely to be a small van or car) will visit Stourhead once a month. This is likely to be from existing staff at the property and access will be on foot to take meter reads and undertake a visual inspection.

All PRoWs that run through or nearby to the proposed development site have been incorporated into the design of the proposed development and their use will not be impeded during the construction or maintenance of the development.

Overall, the Proposed Development is acceptable in traffic and access terms and meets the requirements of national and Local Plan Policy. Planning permission should therefore not be withheld for this reason.

7 Conclusion

For the reasons outlined in this Planning Statement, it is considered that the Proposed Development is in accordance with the relevant planning policies and guidance at both national and local levels.

The Proposed Development represents a clear form of sustainable development, generating clean renewable energy and helping reduce carbon emissions which are required to meet the Climate Act 2050 net zero target.

The Proposed Development will generate renewable electricity for a temporary period of 40 years, to directly supply the National Trust's buildings, visitor facilities and estate operations at Stourhead, significantly reducing reliance on fossil fuels and supporting the Trust's net zero ambitions by 2030. By replacing imported grid electricity with clean, locally generated power, the scheme will deliver measurable carbon savings, improve long-term energy security, and enhance the resilience of the estate's operations. Any surplus electricity produced will be exported to the local distribution network, contributing to the wider decarbonisation of the national energy supply.

The Proposed Development will also provide significant biodiversity enhancements. The BNG assessment found that biodiversity in association with the proposed solar farm will be significantly approved, with 63.92% habitat biodiversity net gain, 37.49% hedgerow biodiversity net gain.

There will be limited changes to the landscape at the site level; however, these will be well contained within the existing field pattern and effectively screened by existing landscape features. The Proposed Development will also be experienced in the context of the adjacent tourism infrastructure associated with Stourhead. The wider landscape, including the Cranborne Chase and West Wiltshire Downs National Landscape, would remain largely unaffected, and no substantial landscape effects are anticipated during the operational lifetime of the development.

Overall, there is an urgent requirement for the Proposed Development; it is entirely suitable to the Site and its surroundings; it accords with national and local planning policy and all relevant material planning considerations; and will deliver significant environmental benefits.

In summary, based on the Proposed Development and assessments undertaken, the Site is deemed suitable for a development of this nature in terms of planning policy and guidance and planning permission should be granted. It is considered that in line with paragraphs 11 and 48 of the NPPF (2019) and Section 38(6) of the Planning and Compulsory Purchase Act 2004, when undertaking the planning balance, the Proposed Development would accord with the local development plan and that there are no material considerations which indicate otherwise.