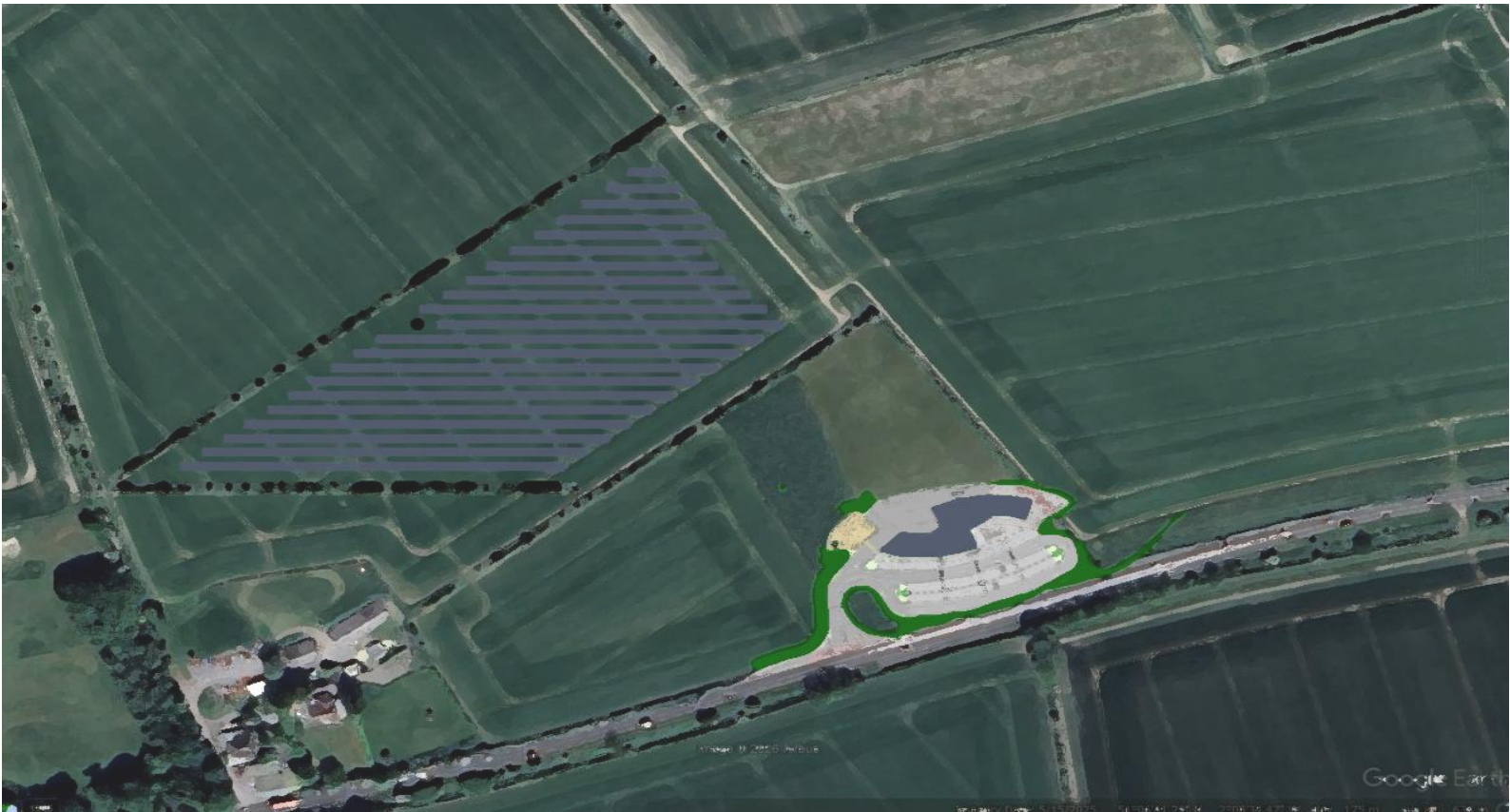


Planning, Design and Access Statement

for a

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



June 2026



Enviromena Project Management UK Limited, 15 Diddenham Court, Lambwood Hill, Grazeley,

Reading, Berkshire, United Kingdom, RG7 1JQ. Company Number: 11225654

www.enviromena.com

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

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

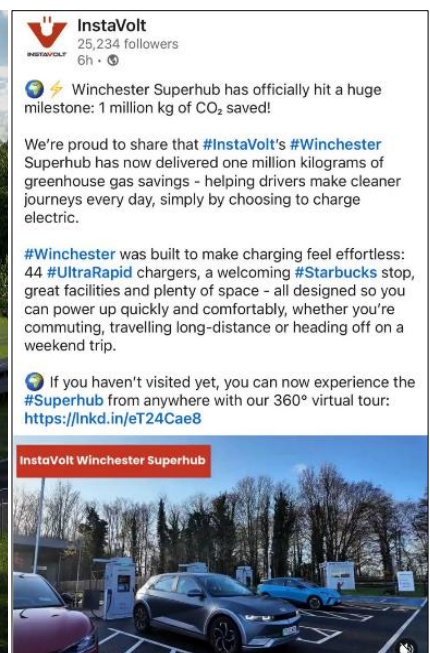
Statement Revision and Issue Date	Report Author	Position	Signed off By	Position
Rev 1 June 2026	Steven Bainbridge BSc MSc MRTPI	Head of Planning	Mark Harding	European Development Director

1. Re-Introduction

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



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



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

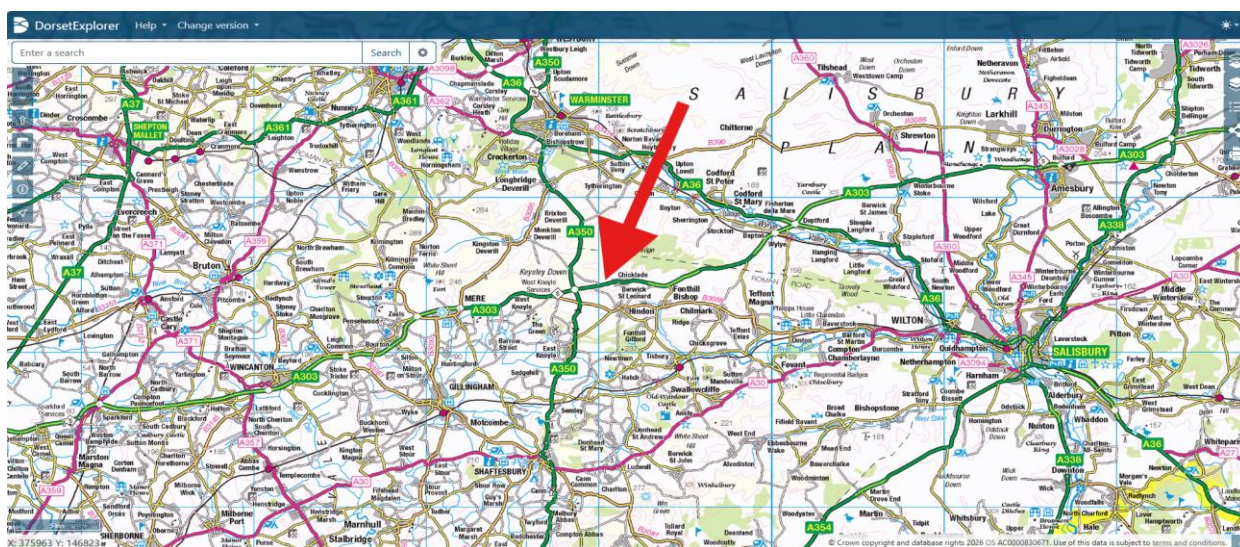
¹ Areas of Outstanding Natural Beauty are still legally called AONBs, plus the term is more commonly understood, while "National Landscapes" is a non-statutory rebranding still to enter common parlance.

1.11 The planning application was submitted in January 2026 and subject to consultation in February and March 2026. This first revision of the Planning Statement responds to comments and requests from technical statutory consultees. Many of the supporting reports and surveys have been amended to provide answers to questions and additional information where requested, and where reasonable and proportionate to do so; to aid decision making.

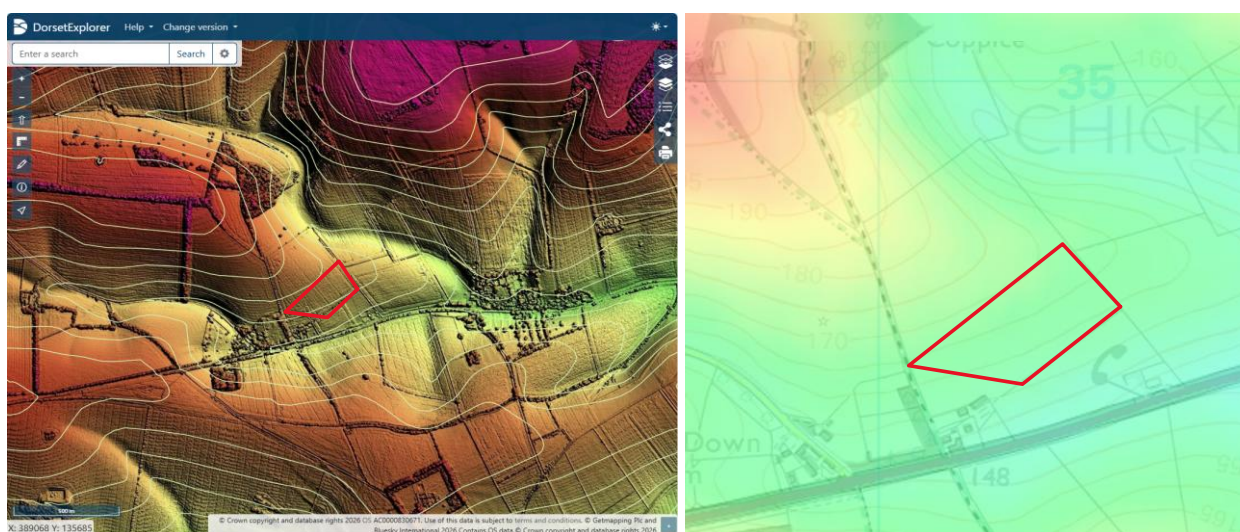
1.12 Comments were received from members of the public and are responded to in Appendix 1. Nothing has come out of public consultation that requires any revision to the proposed scheme.

2. Site Location and Description

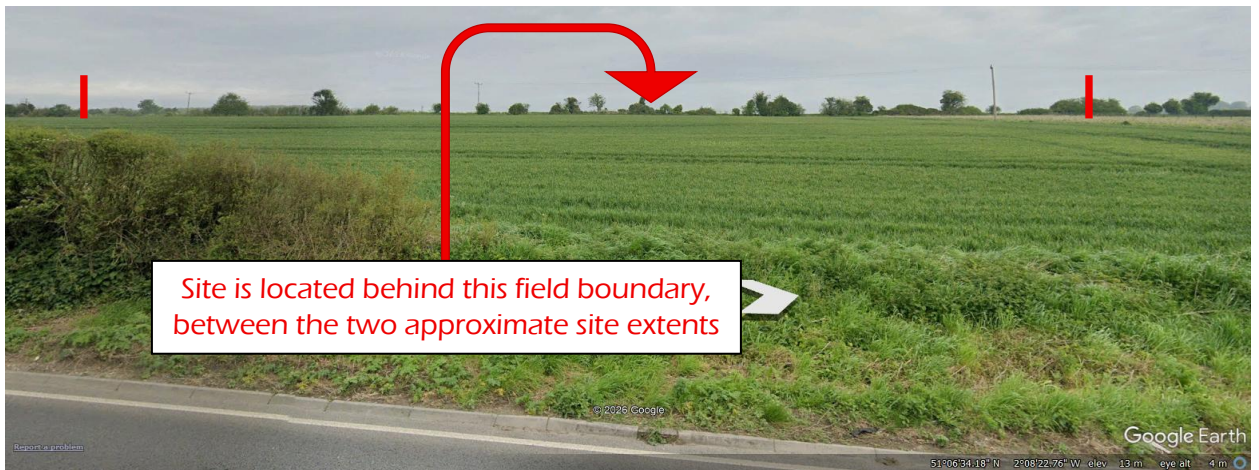
2.1 The site is located north of the A303 in Wiltshire:



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



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



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

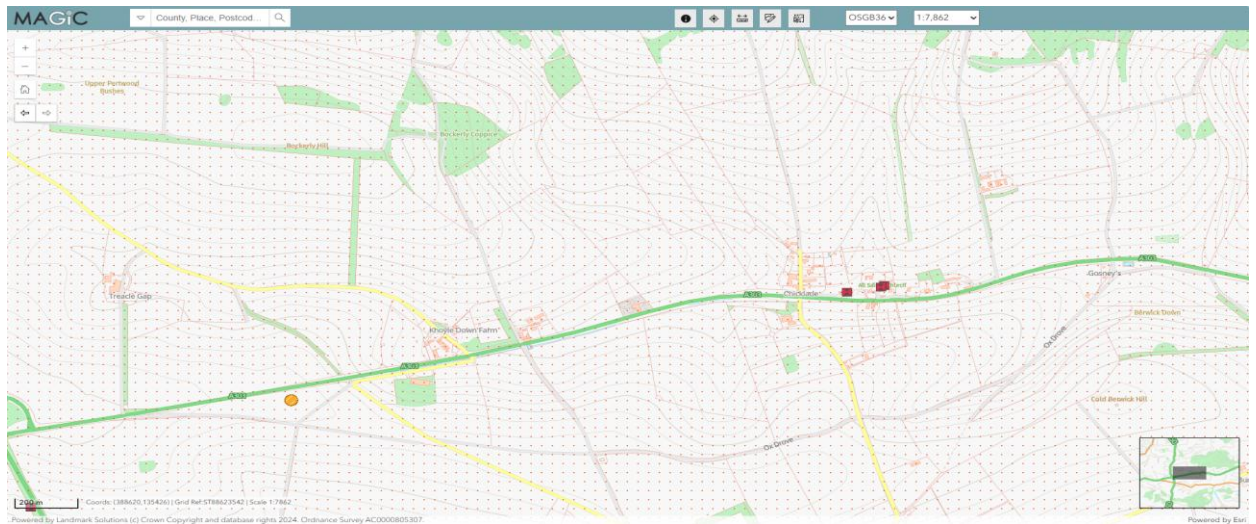


- 2.5 The existing Chicklade service station has planning permission to be redeveloped, and the new EV service station more comprehensively reduces view to the solar site when approaching from the east than the former site:

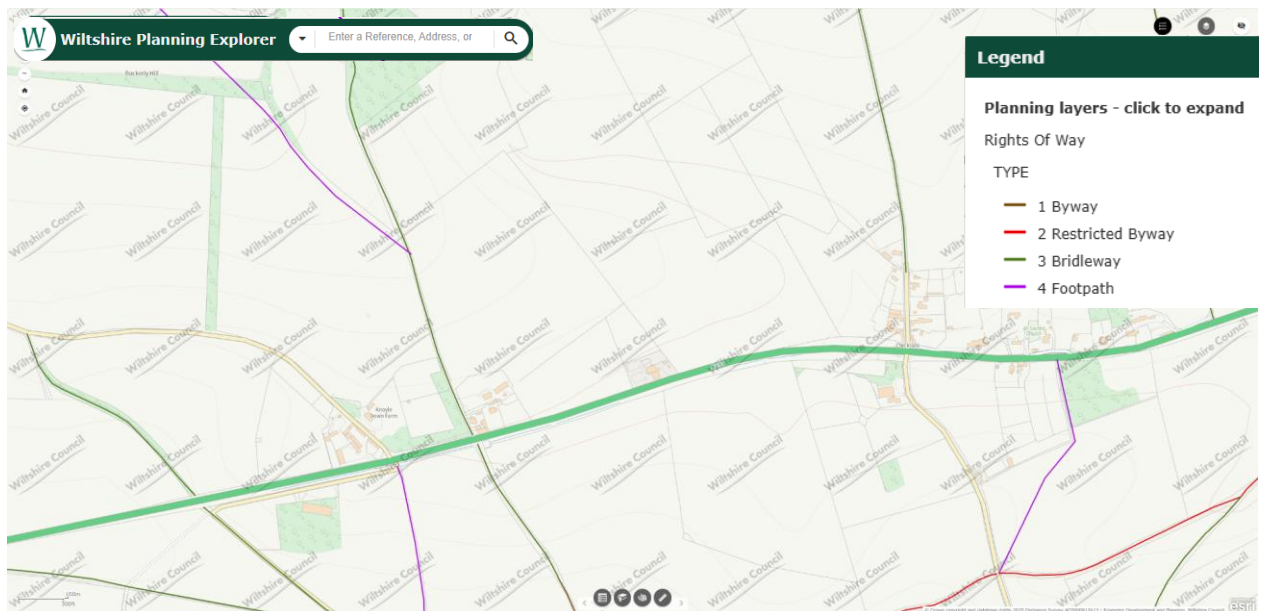


- 2.6 The site is in the Cranborne Chase Area of Outstanding Natural Beauty² (AONB/National Landscape). There is a scheduled monument 770m to the west and GII listed buildings 737m to the east:

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



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



2.8 The site is nominally identified as being Grade 3 agricultural land, notwithstanding the findings discussed in our agricultural land classification report.

2.9 The proposal would not be the only solar farm in the AONB in Wiltshire, others include:



2.10 Further afield, the recent Lower Wyke appeal decision (Appendix 2) confirms that solar farms much larger than this one remain permissible in AONBs.

3. Design and Access

- 3.1 The proposed layout has gone through a number of iterations to refine the design, from an initial site selection exercise, to site-specific design.
- 3.2 Through consultation with the local planning authority and the rights of way officer, a new permissive footpath has been proposed that has driven a change to the planning application red line boundary as shown below:



- 3.3 Good design is a blend of form and function.
- 3.4 The NPPF states that “ 135. *Planning policies and decisions should ensure that developments: a) will **function well** and **add to the overall quality of the area**, not just for the short term but over the lifetime of the development*”.
- 3.5 The approach to the design-assessment of energy infrastructure is set out in NPS EN1 Section 4.7 ‘criteria for good design for energy infrastructure’. It can be a material consideration in planning applications and is especially useful in this case because the NPPF provides no guidance on the approach to design matters for energy infrastructure. NPS EN1 states:
- “4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.*
- 4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the **quality of the area**.*
- 4.7.3 Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.*
- 4.7.4 Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle.”*
- 3.6 The following section provides information on design and access and follows the long-established CABE format, because, in our opinion, the formulaic CABE approach better suites infrastructure development.
- 3.7 It then goes on to provide further design and access information following the approach set out in Planning Practice Guidance³.

CABE approach		
Design	Use	The land will be used for the arrangement of solar arrays in rows. The land can be used for pastoral farming when the solar farm is complete.
	Amount	There will be around 4,500 individual solar modules in rows spaced around 3.2m apart – this is to balance conflicting issues of efficient use of land and panels shading each other.

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

	Layout	The solar arrays are laid out in an east/west alignment, tilted to the south to face the sun.
	Scale	The scale is 3MW over a site area of 12 hectares, and a development area of c.2.8ha. For the scale of the modules, please see the submitted elevation details.
	Landscaping	Landscaping will consist of hedgerow planting/reinforcement and grassland habitat enhancement following biodiversity net gain principles.
	Appearance	The appearance of solar panels in the landscape is not novel and is becoming commonplace in fields and on rooftops. The panels present a dark, slightly reflective surface, atop of a matrix of metal racking across some two fifths of the site, the remainder being open and 'green'.
Access	Vehicular and Transport Links	Access to the site from the A303 will be via Seymour Farm, north of Chicklade Crossroads. Whilst pedestrian access to the site is not required, a benefit of development is a new permissive walking route that will connect the bridleway Chic4 to the east to bridleway Chic 5 to the west.

PPG approach	
Explain the design principles and concepts that have been applied to the proposed development	The siting and location of solar farms is dictated by a well-established range of technical, operational and planning requirements. The arrays are designed in order to use land efficiently, whilst following the topography of the land, in a manner that is not self-defeating. Land Availability: Site options are heavily restrained by land availability. A willing landowner is a major challenge facing renewable energy development. Environmental Designations: Consideration of proximity to areas subject to ecological designation like SSSI, RAMSAR, LNR, Special Areas of Conservation, and Special Protection Areas. Development in such areas is to be avoided. Planning Policy: Site selection is mindful of national and local planning and environmental policy. This ranges from requirements in the NPPF, Local Plan, and Neighbourhood Plans. Sustainable Development: Must be capable of multifunctional enhancements to support the economic, environmental, and social

	dimensions of sustainable development. Due to the land take required for ground-mount solar farms, they require an open countryside location.
Demonstrate the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account	Following the site selection methodology explained above, the application site was considered a suitable location to propose a solar farm. Key points of appraisal include: • Connection to the EV hub. • Availability of land – from an operational perspective the site is free of physical development constraints, it is available for development (the landowner is supportive) and it is capable of accommodating development immediately. • Topography and overshadowing – the land slopes generally from north to south with a fall of some 11m over a distance of some 116m. The field boundaries are well-vegetated and the proposed layout reflects this by keeping panels outside of tree-shaded areas. • Environmental designations – the site is in the AONB. • Solar gain – the site has very good levels of solar irradiation levels.
Explain the applicant's approach to access and how relevant Local Plan policies have been taken into account. Explain how any specific issues which might affect access to the proposed development have been addressed.	Access considerations are limited to the access needs during the construction period, and the immaterial movements associated with subsequent care and maintenance. Initially it was assumed that access would be via the field access to the southwest, and the existing access onto the A303. However, due to a small brick 'build out' on the Mitchell Motors building, visibility to the east on exit was curtailed:  The decision was taken to access through the EV hub, currently under construction, however land levels are such that the access through the EV hub site would be very steep and, for an access that is rarely used post-construction, the engineering exercise required was considered excessive. Therefore, post-submission of the planning application, the

	vehicular access has been moved to the east of the site via Seymour Farm. The site has good road connections to the primary road network for construction and maintenance purposes.
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4. Response to Statutory Consultees

4.1 The table below summarises the responses from statutory consultees and signposts where answers to questions/comments can be found.

Consultee / date	Overall position	Key comments / concerns / requests	Where addressed in Planning Statement / amended documents
Ecology (Wiltshire Council - Abi Gazzard) 19 Mar 2026	Objection - further information required / HRA information required	- Information required to complete HRA / Appropriate Assessment for Chilmark Quarries SAC, principally lighting details. - Clarification requested on location, type, number and specification of any external lighting, including transformer station lighting. - Breeding bird mitigation/enhancement to be secured through LEMP. - CEMP required for protected species during construction. - BNG acceptable in principle, with HMMP and monitoring arrangements required.	- PDAS Addendum: sections 1.11 and 4.6-4.7 explain that the supporting reports were amended following consultation and summarise the revised ecology/BNG position. - PEA & BMA rev01B: confirms no introduction of lighting is proposed other than a single security PIR light over the single transformer station, assesses Chilmark Quarries SAC bat-related sensitivities, and identifies retained/increased bat foraging and commuting opportunities through hedgerow, grassland and orchard creation. - PEA & BMA rev01B: sections 6.2-6.6 address protected-species mitigation, breeding birds, CEMP/LEMP/HMMP requirements, and 30-year habitat management. - Landscape Framework Plan_P6 shows the habitat creation/enhancement package, including lowland meadow, native hedgerows, hedgerows with trees, orchard and woodland planting.
Drainage (AtkinsRealis / Wiltshire Council) 19 Mar 2026 portal / 06 Mar 2026 response	No objection subject to conditions	- Site in Flood Zone 1 and generally low risk, but a detailed surface-water strategy is required. - Overland exceedance routes required for flows above the 1 in 100 year plus climate-change event.	- PDAS Addendum: sections 4.9, 5.26 and 7.79-7.80 summarise the FRA/SWS position: Flood Zone 1, no watercourses on or adjacent to the site, low surface-water and groundwater risk, soil management to maintain permeability, and a precautionary cut-off swale downhill of the panels.

Consultee / date	Overall position	Key comments / concerns / requests	Where addressed in Planning Statement / amended documents
		- Concern that runoff from panels could cause sheet flow, erosion or channelised flow. - BRE 365 soakaway testing and calculations required to demonstrate infiltration feasibility, storage, half-drain time and factor of safety.	- FRA_RevA: sections 3-7 and appendices E-G provide the revised flood-risk and surface-water strategy, including runoff, groundwater, soil permeability and the revised eastern access boundary. - The consultee response is already a no-objection response subject to conditions. Exceedance-route detail, BRE 365 testing and supporting calculations are therefore recorded as condition-discharge matters rather than outstanding reasons to withhold permission.
Sedgehill & Semley Parish Council <i>13 Mar 2026</i>	Objection	- Concern about negative impact on the environment and ecological habitat. - Particular concern due to location within the Cranborne Chase National Landscape / AONB. - Requested careful consideration to preserve the nature of the AONB for current and future generations.	- PDAS Addendum: sections 2.6, 4.6-4.12, 6.61-6.69 and 7 address the AONB/National Landscape, ecology, climate/public benefits, the major-development test and the overall planning balance. - LVIA Report_P4: sections 5-8 assess landscape and visual effects, including National Landscape effects. It acknowledges adverse effects but explains that they are localised, mitigated by planting, associated with an existing transport/EV hub context, and reversible at decommissioning. - PEA & BMA rev01B and Landscape Framework Plan_P6 address ecological habitat creation/enhancement, including other neutral grassland, native hedgerows, hedgerows with trees, orchard and woodland planting, with BNG of +143.69% area habitat units and +84.12% hedgerow units.
Environment Agency <i>12 Mar 2026</i>	No objection	- Site is within Source Protection Zone 3, so groundwater sensitivity should be considered. - Positive comments on BNG proposals, including lowland	- FRA_RevA / PDAS Addendum sections 4.9 and 5.26 address flood risk, groundwater risk, runoff, soil permeability and the precautionary cut-off swale. - COTMPlan 01A section 6 addresses construction-stage dust, fuel use, waste management, wheel washing and mud-on-road

Consultee / date	Overall position	Key comments / concerns / requests	Where addressed in Planning Statement / amended documents
		meadow within the red line. - Requested reconsultation if BESS is added in future.	controls, relevant to construction pollution prevention. - PEA & BMA rev01B sections 6.5-6.6 and Landscape Framework Plan_P6 confirm the BNG habitat package including meadow, hedgerow, orchard and woodland planting. - PDAS Appendix A1 clarifies that the proposal is not a BESS-led scheme. If BESS is proposed later, the EA reconsultation request remains a future action.
National Highways 12 Mar 2026	Holding objection / deferral pending further information	- Requested delay pending further information on access and construction traffic. - Concern that access through the EV hub conflicted with the EV hub permission/plans and onward-connection restrictions. - Construction traffic phasing, parking/compound arrangements, routing and interaction with EV hub construction were unclear. - Visibility, swept-path, access geometry, drainage from the access road and A303 traffic-management evidence required. - Glint/glare mitigation must be within the development site, not reliant on third-party or National Highways land.	- PDAS Addendum: Design and Access section explains the post-submission access change; vehicular access has moved to the east via Seymour Farm / north of Chicklade Crossroads rather than through the EV hub. - COTMPlan 01A: section 1.4 records pre-application engagement with National Highways on 5 May 2026 and states that National Highways were supportive in principle of the revised existing A303 access, subject to a CTMP with sufficient construction-management detail. - COTMPlan 01A: sections 3-5 provide construction trip numbers, vehicle-size controls, staff parking, temporary construction compound, route management, booking system, banksmen, peak-hour avoidance, signage and route compliance. Appendices B-F provide visibility splay, swept-path and ATC evidence. - Glint and Glare v4 and Landscape Framework Plan_P6 address reflection/screening; on-site boundary hedge/woodland/orchard planting is shown on the landscape framework.
Public Protection (Environmental Health) 12 Mar 2026	Comment - conditions recommended	- Operational noise from inverters/transformers should not exceed background noise at	- Noise condition: can be accepted if imposed by the LPA. PDAS Appendix A1 records that the operational solar farm is essentially silent, normally unlit and has no

Consultee / date	Overall position	Key comments / concerns / requests	Where addressed in Planning Statement / amended documents
		nearest residential premises, measured/calculated under BS4142. - Recommended construction hours of 08:00-18:00 Monday-Friday and 08:00-13:00 Saturdays, with no Sunday/Public Holiday working, and compliance with the COTMP. - Glint/glare assessment considered incomplete because upper-storey windows had not been assessed. - Concern about reliance on external screening outside the applicant's control.	moving parts; COTMPlan 01A sections 6.2-6.3 address construction dust and noise controls. - Construction controls: COTMPlan 01A section 2.4 confirms no Sunday or Bank Holiday working and Saturday morning working only. It currently states 07:00-19:00 Monday-Friday, so Public Protection's narrower 08:00-18:00 wording would need to be applied through condition if required. - Glint and Glare v4: sections 4.4 and 5.3 assess 18 dwelling receptors and expressly consider whether visibility is likely from all storeys where relevant. The report concludes no significant residential amenity impacts and no mitigation requirement. - Landscape Framework Plan_P6 shows proposed on-site hedgerow/woodland/orchard planting, reducing reliance on off-site screening.
Hindon Parish Council 11 Mar 2026	Objection	- Views from popular walking routes around Hawking Down / HIND4 / CHIC10 / CHICK11 / EKN05 would be affected. - Concern over increased traffic. - Suggested solar panels should be part of the EV station and not a separate solar farm.	- PDAS Addendum: sections 1.2-1.3 explain that the scheme is a 3MW private-wire array serving the approved EV charging hub; it is functionally linked to the EV hub rather than a standalone unrelated project. - PDAS Addendum: sections 4.12, 6 and 7 address landscape/AONB impacts and the planning balance. Appendix A1 responds to public comments on National Landscape / AONB and visual impact. - LVIA Report_P4: sections 7-8, with LVIA Appendix 2 diagrams, assess public rights of way and wider visual receptors. - COTMPlan 01A: sections 3-7 and appendices A-F address construction traffic, revised access, vehicle numbers, visibility, swept paths, booking, banksmen, peak-hour avoidance, wheel washing and route controls.

Consultee / date	Overall position	Key comments / concerns / requests	Where addressed in Planning Statement / amended documents
Arboricultural Officer - Shane Verrion <i>11 Mar 2026</i>	No objection	- No objection.	- No further technical response is required because the consultee raises no objection. - PDAS Addendum section 4.3 summarises the arboricultural position. - AIA May 2026 confirms no trees will be removed, only two sections of C-grade hedgerow are required for access, no facilitative pruning is required, and tree-protection fencing plus arboricultural supervision will be used. - Landscape Framework Plan_P6 shows replacement/enhancement planting, including new native hedgerows, hedgerows with trees, orchard and woodland planting.
Highways Department (Wiltshire Council) <i>09 Mar 2026</i>	Comment - no formal objection	- Noted that the site is accessed from the A303 trunk road and advised the case officer to take guidance from National Highways.	- Addressed through the National Highways response package. - COTMPlan 01A is the key amended transport document: it revises access away from the EV hub, records National Highways support in principle, and provides the construction route, visibility, swept-path, ATC and traffic-management material requested.
Rights of Way Officer <i>06 Mar 2026</i>	Comment - supportive with suggestions	- Opportunity to create a circular walking route north of the A303 by linking the service station to CHIC5 via the new access road / newly constructed hedge. - Suggested dedication of a footpath, potentially when power is first exported. - Construction near Bridleway CHIC5 requires care, warning signs and timing to avoid busier bridleway periods.	- PDAS Addendum section 3.2 explains that, following consultation with the LPA and Rights of Way officer, a new permissive footpath has been proposed and the red line has been amended. - PDAS Addendum planning balance / rights-of-way section identifies the new permissive walking route linking CHIC4 and CHIC5 and treats it as a benefit of the scheme. - Landscape Framework Plan_P6 shows the permissive footpath as a grass-surface route, together with the grass-surface occasional access track and new hedgerow/planting framework. - COTMPlan 01A manages construction access, routing, signage, banksmen and

Consultee / date	Overall position	Key comments / concerns / requests	Where addressed in Planning Statement / amended documents
			compound arrangements. If dedication rather than permissive access is required, that would need to be secured through the appropriate legal mechanism.
Historic England - Ancient Monuments <i>04 Mar 2026</i>	Comment - no advice / neutral	- Historic England did not offer advice and stated this should not be read as a comment on the merits of the application. - Recommended seeking views of specialist conservation and archaeological advisers. - No need to reconsult unless there are material changes.	- PDAS Addendum sections 4.4, 4.10, 5.25 and 7.74-7.76 summarise the archaeological and heritage conclusions and apply a precautionary heritage balance. - Heritage Impact Assessment rev1 sections 2-5 identify relevant designated and non-designated heritage assets, assess significance and setting, and conclude no harm to the assessed heritage assets. - Archaeological Assessment P02 assesses the Scheduled Monument and Wiltshire HER data within the study area, identifies low archaeological potential, and concludes impacts are likely to be less than substantial in NPPF terms. - The separate Wiltshire Council Archaeology response is included below.
Archaeology (Wiltshire Council - Roland Smith) <i>24 Feb 2026</i>	No objection subject to archaeological condition	- Desk-based assessment and geophysical survey submitted and reviewed. - Archaeological potential assessed as low; geophysical survey identified only a few anomalies that might indicate buried remains. - Proposed solar array occupies only a small proportion of the red line boundary and does not require substantial earthmoving or below-ground impacts. - Further archaeological investigation can be undertaken post-	- Archaeological Assessment P02 (April 2026) provides the desk-based assessment and incorporates the geophysical survey. It identifies one Scheduled Monument within the 1km study area, low archaeological potential, and limited likely ground impact from the solar farm. - PDAS Addendum section 4.4 summarises the archaeological assessment; sections 7.74-7.76 consider any heritage/archaeological harm as less than substantial and at the lower end of that range on a precautionary basis. - The consultee expressly accepts that further archaeological investigation can be secured post-consent. The recommended WSI / trial trench / investigation / reporting requirement can therefore be accepted as a

Consultee / date	Overall position	Key comments / concerns / requests	Where addressed in Planning Statement / amended documents
		consent and secured by condition. - Recommended condition requires written programme of archaeological investigation, initial trial trench evaluation, further investigation if required, and post-fieldwork assessment/analysis/reporting/publication.	planning condition rather than being an outstanding pre-determination matter.

5. Outcomes of Surveys

5.1 The planning application is supported by the following assessments, reports and surveys, amended where necessary following consultation responses and the access change:

- Agricultural land report
- Arboricultural impact assessment
- Archaeological assessment
- Construction and operational traffic management plan
- Ecology survey and report
- Environmental statement
- Flood risk assessment and surface water strategy
- Glint and glare report
- Heritage impact assessment
- Landscape and visual impact assessment

5.2 The submitted **agricultural land classification report** concludes that

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

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

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

The land has been classified as comprising 10.3 ha (83.7%) Subgrade 3a agricultural land and 2 ha (16.3%) Subgrade 3b agricultural land. The area of Subgrade 3b land lies on sloping land to the north and so is not suitable for locating solar panels. It would also be detached from the EV charging station for which the panels will

*generate energy. Therefore there is **no potential to micro-site the proposed development onto poorer quality land within the Site.***

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

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

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

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

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

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

5.3 The submitted **arboricultural impact assessment** is clear that:

*"No trees will need to be removed but two sections of C-grade hedgerow (from H5 & H7) will need to be removed to construct the proposed development. No other removals or facilitative tree pruning will be required" and concludes that "The proposed solar farm will be surrounded by new native hedgerow planting which will include hedgerow trees as well as an area of woodland tree planting to mitigate visual impacts to the east of the site. Details of the new tree and hedge planting are included on the Landscape Framework Plan produced by LHC Design which accompanies this submission. **Overall, the proposed planting will more than compensate for the loss of the two sections of hedgerow that will need to be removed, and it will result in a much greater canopy cover for the site"**.*

5.4 The submitted **archaeological assessment** concludes that:

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

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

is proposed. A Minor Negative magnitude of impact would result in a Slight Negative significance of effect.

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

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

- 5.5 The submitted **construction and operational traffic management plan** concludes that:

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

- 5.6 The submitted **ecology survey** concludes that:

"It is proposed to develop a solar farm to facilitate an EV charging hub, with associated landscaping and localised ground disturbance to provide access and infrastructure. This will remove a limited extent of hedgerow for an access gate, extents of non-cereal crop land, arable field margins and bare ground. No introduction of lighting is proposed for the development.

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

- 5.7 The submitted **biodiversity net gain report** concludes that:

"The Biodiversity Metric Assessment (BMA) results in an 143.69% gain for area habitats and an 84.12% gain for hedgerow habitats, with mitigation, compensation and enhancement measures provided for protected species. Consequently, the development is considered to demonstrate a positive biodiversity impact at the site level".

- 5.8 The addended environmental statement concludes that:

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

The LVIA identifies major to moderate adverse landscape effect (for the duration of the solar array operation), slight to moderate adverse effect on the NCA and moderate adverse effect

on the National Landscape. The identified landscape impacts are predicted for the operational lifetime of the solar array and are reversible thereafter.

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

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

5.9 The submitted **flood and drainage report** concludes that:

"The development is located fully within flood zone 1.

There are no watercourses on or adjacent to the site.

The site is at low risk of surface water flooding.

The site is at low risk of groundwater flooding.

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

5.10 The submitted **heritage impact assessment** concludes that:

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

5.11 The submitted **glint and glare study** concludes that:

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

5.12 The submitted **landscape and visual impact assessment** concludes that:

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

6. Development Plan

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

6.2 In this case the development plan consists of:

○ Wiltshire Core Strategy 2015⁴

○ Saved Policies of the 2011 Salisbury District Local Plan

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

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

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

*21. Plans should make explicit which policies are strategic policies. These **should be limited to those necessary to address the strategic priorities of the area** (and any relevant cross-boundary issues), to provide a clear **starting point** for any non- strategic policies that are needed. **Strategic policies should not extend to detailed matters** that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.*

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

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

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

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

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

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

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

- 6.7 **Core Policy 1** is focused on the types of development that will go inside settlements and is not relevant to decision making in this case.
- 6.8 **Core Policy 2** focusses on housing numbers, employment land and retail floorspace and does not read as relevant to decision making in this case.
- 6.9 **Core Policy 3** concerns the infrastructure demands created by development; typically the kinds of infrastructure required in s106 agreements and/or covered by CIL. This scheme will not generate any infrastructure demands on Wiltshire.
- 6.10 **Core Policy 20** drills down from Core Policy 1 as relevant to the Salisbury Community Area. Core Policy 1 is not relevant, and nor is Core Policy 20 as a result.
- 6.11 **Core Policy 41** is key to delivering the Core Strategy's approach to tackling climate change. Insofar as the policy is relevant, it requires existing buildings to retrofit measures to use renewable energy from a local source. Whilst the EV hub is approved to use a small amount of solar power already, this scheme will contribute further to the site's energy demand, providing EV drivers with renewable energy for charging their vehicles close to the source of demand.
- 6.12 **Core Policy 42** concerns standalone renewable energy proposals. Core Policy 42 does not introduce substantive decision-making criteria against which proposals are to be judged. Rather, it confirms the principle of standalone renewable energy development and identifies matters to be assessed through reference to other relevant Core Policies. As such, the acceptability of proposals necessarily turns on compliance with those other policies, rather than on Core Policy 42 itself. We respond to the policy's assessment requirements below, in as far as they are relevant, determinative or useful:

Core Policy 42	Our response
<i>Proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site specific constraints. In particular, proposals will need</i>	Whilst this scheme is not standalone, the general support for renewable energy schemes is noted.

<i>to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account:</i>	
<i>i. The landscape, particularly in and around AONBs</i>	This planning application includes the Landscape and Visual Impact assessment which underpins the Environmental Statement, satisfactorily assessing the scheme in landscape terms. Cumulative assessment of nearby development, including the EV hub, is part and parcel of that assessment.
<i>ii. The Western Wiltshire Green Belt</i>	Not relevant.
<i>iii. The New Forest National Park</i>	Not relevant.
<i>iv. Biodiversity</i>	Site specific surveys have been undertaken, with mitigation recommended and Biodiversity Net Gain proposals in addition, demonstrating that biodiversity has been satisfactorily assessed.
<i>v. The historic environment including the Stonehenge and Avebury World Heritage Site and its setting</i>	The planning application is supported by two relevant assessments; a heritage impact assessment (above ground heritage) and an archaeological assessment (below ground heritage).
<i>vi. Use of the local transport network</i>	The planning application is supported by a Transport Statement setting out the transport implications of the scheme.
<i>vii. Residential amenity, including noise, odour, visual amenity and safety</i>	The planning application is supported by a Glint and Glare assessment which focusses on residential amenity amongst other industry-standard factors.
<i>viii. Best and most versatile agricultural land.</i>	The planning application is supported by an Agricultural Land Classification report so that the implications of the scheme on BMV land can be assessed.
<i>Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context.</i>	This repeats national policy and is noted.

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

6.14 **Core Policy 50** concerns biodiversity. It requires development proposal to demonstrate how

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

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

Core Policy 51 Landscape Character Consideration	Our Response
<i>i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.</i>	The solar arrays are laid out to avoid field boundaries. No disturbance to the local field pattern is required by this scheme.
<i>ii. The locally distinctive character of settlements and their landscape settings.</i>	The scheme does not impact the landscape setting of any settlement.
<i>iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.</i>	The scheme is associated with the consented EV hub, and therefore will not compromise the separate identity of settlements.
<i>iv. Visually sensitive skylines, soils, geological and topographical features.</i>	The landscape and visual impact assessment includes viewpoints photos. Solar development follows and relates to the topography of the land. Due to landform, the proposal does not impact on any skylines. The proposal will not lead to the loss of or harm to soils. In fact, resting land from intensive arable use for decades is a benefit to soil organic content and structure.
<i>v. Landscape features of cultural, historic and heritage value.</i>	The proposal will not adversely affect any landscape features of heritage value.
<i>vi. Important views and visual amenity.</i>	The proposal will not affect any known 'important views'. There is no neighbourhood plan to identify such. In terms of visual amenity, the landscape and visual impact assessment assesses the scheme from viewpoints in the local area, most of which relates to the zone of theoretical visibility. For the avoidance of doubt a number of views are taken from locations along the Wessex Ridgeway and Monarch's Way in the event these constitute

	‘important views’. The LVIA assesses the visual impacts of the scheme in the theoretical baseline of a bare ground ZTV, and then after development has commenced at various intervals when landscaping and mitigation has had effect.
<i>vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.</i>	Solar farms are essentially silent. Some barley audible noise (a low ‘hum’) may be audible within metres of the inverters but are imperceptible from outside of the fenced boundaries of our sites. Our sites are not lit, and only the small transformer station might have a small personnel light on its door for health and safety reasons; which is only triggered on the rare occasion of a maintenance visit. Once complete there will be no motion associated with the scheme. It will not affect the tranquillity of the area.
<i>viii. Landscape functions including places to live, work, relax and recreate.</i>	The only landscape function which this scheme could interfere with is recreation. The site is adjacent to a right of way and may be visible from other rights of way in the area. In all cases the site is likely to be seen in the context of the neighbouring EV hub, reducing the harm.
<i>ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.</i>	Whilst not clearly set out in the AONB Management Plan, the special qualities of the Cranborne Chase appear to be set out in its paragraph 2.1 as “<i>diversity, distinctiveness, sense of history and remoteness, dark night skies, tranquillity; and its overwhelmingly rural character</i>”. This proposal will not fundamentally undermine any of the AONBs special qualities by virtue of its relatively small size, its low height, topographical sensitivity and light footing on the land.

6.16 The LVIA concludes on landscape character “*the magnitude of effect on the NCA is assessed as low, with an overall significance of **slight to moderate** adverse*”.

6.17 Core Policy 51 goes on to state that proposals for development within the AONB shall demonstrate it has taken account of the objectives, policies and actions in the relevant management plan. These are discussed in the Material Considerations section below in greater detail, but in summary “*The changes are long term and experienced over an intermediate area resulting in an **overall moderate** adverse effect*”

6.18 Core Policy 52 concerns green infrastructure and requires development to make provision for

green infrastructure networks. This scheme will not interrupt the site's green infrastructure networks because the development is set within the vegetated boundaries of the site. In fact the provision of new and enhanced boundary planting will support green infrastructure.

- 6.19 **Core Policy 57** concerns ensuring high quality design. When discussing 'development', local plans are predominantly concerned with housing and employment. This is often seen where policies talk of local vernacular and materials for example.
- 6.20 High quality design is a blend of form and function. The NPPF states that "*135. Planning policies and decisions should ensure that developments: a) will **function well** and **add to the overall quality of the area**, not just for the short term but over the lifetime of the development*".
- 6.21 The approach to the design-assessment of energy infrastructure is set out in NPS EN1 Section 4.7 'criteria for good design for energy infrastructure'. It can be a material consideration in planning applications and is especially useful in this case because the NPPF provides no guidance on the approach to design matters for energy infrastructure. NPS EN1 states:
- "4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.*
- 4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.*
- 4.7.3 Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.*
- 4.7.4 Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle."*
- 6.22 The policy requires a high standard of design in all new developments, and insofar as solar development is concerned, this scheme is high quality in relation to the materials, layout and landscaping.
- 6.23 Accepting that ground-mounted solar necessitates a countryside setting, and that this scheme serves the approved EV hub, increasing its sustainability credentials, the scheme relates positively to its setting; the approved EV hub, the A303, nearby commercial buildings and overhead electrical infrastructure. The scheme retains existing landscape features (boundary hedgerows and trees). The scheme responds positively to the local topography having selected a site that is in the lower reaches of available land to minimise landscape impacts.
- 6.24 The policy also talks of maximising sustainable construction techniques. Whilst InstaVolt are

in the process of submitting details on materials, this policy aims speaks to Core Policy 41 and the enhanced sustainability credentials of the EV hub sourcing more of its green energy locally, at source.

- 6.25 **Core Policy 58** seeks to ensure conservation of the historic environment. This planning application is supported by above and below ground heritage studies. The heritage impact assessment confirms that any harm to the above-ground historic environment is less than substantial, at most. The archaeology survey confirms that any harm is also less than substantial.
- 6.26 **Core Policy 67** relates to flood risk and discusses the application of sequential testing in flood zones 2 and 3. The site is in flood zone 1. The policy goes on to require SuDS measures unless they are unsuitable. The submitted drainage report is clear that:
- *The development is located fully within flood zone 1*
 - *There are no watercourses on or adjacent to the site*
 - *The site is at low risk of surface water flooding*
 - *The site is at low risk of groundwater flooding*
 - *The site soil will be appropriately managed during and post construction to maintain permeability and reduce the risk of increased runoff. As a precaution, a cut-off swale can be installed on the downhill side of the panels*
- 6.27 Overall, the assessment above demonstrates that the proposal accords with the development plan when its policies are applied for decision-making purposes in accordance with the NPPF. The Wiltshire Core Strategy is a strategic document, and none of its relevant policies are development management policies capable of justifying refusal unless the proposal would prejudice the delivery of the Strategy's overarching objectives. For a development of this scale and nature, associated directly with an existing consented EV hub, no such strategic prejudice arises. Where strategic policies are engaged—most notably those relating to climate change, renewable energy, biodiversity, landscape, design, the historic environment and flood risk—the proposal has been supported by appropriate technical assessments and demonstrates compliance with the policy intent, either by avoiding harm, mitigating impacts, or delivering clear environmental and sustainability benefits.
- 6.28 In particular, the proposal supports the Core Strategy's objectives on tackling climate change and supporting renewable energy generation, protects and enhances biodiversity, conserves landscape character including the special qualities of the AONB, achieves a high standard of functional and contextual design, safeguards the historic environment, and poses no flood risk concerns. Saved policies of the Salisbury District Local Plan raise no conflicts, and there is no adopted development management framework that would indicate otherwise. Taken as a whole, the proposal is consistent with the development plan when read as a whole and in the manner required by national policy. Accordingly, the statutory presumption in favour of determination in accordance with the development plan applies, with no policy conflict that would warrant refusal.

7. Material Considerations

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

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

National Planning Policy Framework December 2024 v2

7.2 The National Planning Policy Framework (December 2024) is a primary material consideration and attracts substantial weight.

7.3 Paragraph 11 confirms that the planning system's purpose is to contribute to the achievement of sustainable development, which is defined through economic, social and environmental objectives. Paragraph 8 makes clear that these objectives are mutually supportive and should be pursued in an integrated manner.

Climate Change and Renewable Energy

7.4 Paragraph 161 confirms that the planning system should support the transition to a low-carbon future and help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. Paragraph 168 is of particular relevance. It requires local planning authorities, when determining applications for renewable and low-carbon energy development and associated infrastructure, to give significant weight to the benefits associated with renewable energy generation and its contribution to a net-zero future, and not to require applicants to demonstrate the overall need for renewable energy (paragraph 168(a)). It further recognises that small-scale and localised renewable energy projects make a valuable contribution to cutting greenhouse gas emissions (paragraph 168(b)).

7.5 The proposal directly engages these provisions by delivering renewable electricity generation

to serve a consented EV charging hub, reducing reliance on grid electricity and fossil-fuel-derived energy sources.

Sustainable Transport and Transport Decarbonisation

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

Economic Development and a Sustainable Economy

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

Good Design

- 7.10 Paragraphs 131 and 135 of the Framework emphasise that good design is a key aspect of sustainable development and that developments should be visually attractive, sympathetic to local character, and functionally efficient.
- 7.11 The proposal has been designed to reflect its landscape context, minimise visual intrusion, and operate efficiently in functional association with the EV hub. Design in this context must be understood in terms of infrastructure efficiency, landscape integration and reversibility, all of which are achieved.

Paragraph 190 – Major Development in National Landscapes

- 7.12 Paragraph 190 of the National Planning Policy Framework (December 2024 v2) establishes that permission should be refused for major development within National Landscapes other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. The Framework identifies three matters to be assessed in determining whether such exceptional circumstances exist.
- 7.13 The proposal has been assessed against each of these matters, informed by the Landscape and Visual Impact Assessment (LVIA) prepared by LHC Design (January 2026).

(a) The need for the development, including any national considerations, and the impact of permitting or refusing it upon the local economy

- 7.14 There is a clear and compelling national need for renewable and low-carbon energy development, particularly where it directly supports the decarbonisation of transport infrastructure. National policy requires significant weight to be given to the benefits of

renewable energy generation and makes clear that applicants are not required to demonstrate the overall need for such development.

- 7.15 In this case, the proposal has a direct and functional relationship with the consented EV charging hub adjacent to the site, supplying renewable electricity at source via a private-wire arrangement. This relationship materially strengthens the public interest case, as the development enables low-carbon transport infrastructure on the Strategic Road Network and reduces reliance on grid electricity.
- 7.16 The LVIA identifies that the site sits within a landscape already strongly influenced by the A303 transport corridor, associated commercial development and infrastructure, with existing reductions in tranquility and landscape quality at the valley floor (LVIA paragraphs 4.9, 4.33–4.34). Locating the solar development in this context avoids more remote, tranquil and visually sensitive parts of the National Landscape and represents a proportionate response to the identified need
- 7.17 At a local level, the development supports rural economic diversification and reinforces investment in clean energy and transport infrastructure. Refusal would frustrate these benefits and undermine the effective delivery of nationally important decarbonisation objectives.
- (b) The cost of, and scope for, developing outside the designated area, or meeting the need in some other way*
- 7.18 The scope for meeting the identified need outside the designated landscape is materially constrained. The LVIA confirms that the site has been selected due to its proximity to the EV charging hub, its containment by landform and vegetation, and its location within a developed transport corridor (LVIA paragraphs 3.2, 4.7–4.9, 6.14)
- 7.19 Relocating the development outside the National Landscape would sever the functional relationship with the EV hub, require additional infrastructure, increase costs, and reduce the efficiency and carbon benefits of the scheme. Alternative locations would not deliver the same co-location of generation and demand and would likely introduce new landscape and visual effects elsewhere.
- 7.20 The LVIA demonstrates that the chosen site has a **medium landscape sensitivity**, with opportunities for mitigation, and a **medium ability to accept change**, particularly when compared to more open and tranquil parts of the National Landscape (LVIA paragraphs 6.9–6.10)
- 7.21 In this context, there is no preferable or realistic alternative that would meet the need in a less harmful way.
- (c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated*
- 7.22 The LVIA provides a comprehensive assessment of landscape and visual effects at site, local and wider landscape scales.
- 7.23 At the **site and immediate surroundings**, the LVIA identifies a **major to moderate adverse landscape effect**, reflecting the fundamental change from arable land to solar development (LVIA paragraph 6.12). However, this effect is localised and moderated by substantial mitigation, including retained and reinforced hedgerows, new woodland planting and wildflower grassland, which also deliver landscape and ecological enhancement

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- 7.24 At the scale of the **National Character Area**, the LVIA concludes that the magnitude of change is **low**, with an overall **slight to moderate adverse effect**, reflecting the limited geographical extent of visibility and the site's location close to existing infrastructure (LVIA paragraphs 6.15–6.17)
- 7.25 Within the **Cranborne Chase National Landscape**, the LVIA identifies a **moderate adverse effect**, arising from the area's high sensitivity, but confirms that the proposals are small in scale relative to the wider landscape, do not affect key archaeological features, and accord with landscape character objectives through retention and enhancement of field boundaries (LVIA paragraphs 6.18–6.19)
- 7.26 Visual effects are similarly nuanced. The LVIA confirms that visibility from the A303 and nearby minor roads is **negligible to minimal adverse**, while the greatest visual effects are experienced by users of bridleways closest to the site, where **major to moderate adverse effects** reduce over time as mitigation planting establishes (LVIA paragraphs 7.8–7.18)
- 7.27 Effects on long-distance routes such as the Monarch's Way are limited, distant and slight to moderate adverse, with no effects on the Wessex Ridgeway.
- 7.28 Overall, the LVIA demonstrates that landscape and visual effects are limited in extent, appropriately mitigated, and do not undermine the special qualities of the National Landscape.

Conclusion on Paragraph 190

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

Wiltshire Local Plan Review (withdrawn)

- 7.30 The Wiltshire Local Plan Review (Pre-Submission Draft, Regulation 19, September 2023) was an emerging development plan document and therefore a material consideration, but has since been withdrawn, giving it no weight in decision making.
- 7.31 Notwithstanding its withdrawn status, the Local Plan Review provided a clear and relevant statement of the Council's strategic direction, particularly in relation to climate change mitigation, renewable energy, sustainable transport, economic resilience and environmental enhancement.
- 7.32 We discuss the approach of the withdrawn plan below, not because it is a material consideration, but to lament its absence in terms of local climate and renewable policy and in doing so to highlight the gap between the aged policy of the old Core Strategy and what might have been, had the housing situation in Wiltshire not dragged the whole plan review down.

Strategic Direction of the Local Plan Review

- 7.33 The Spatial Vision for Wiltshire sought to achieve "*significant strides towards carbon neutrality*" by 2038, supported by renewable energy generation, sustainable transport, a resilient green economy, high quality design and meaningful biodiversity net gain

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- 7.34 Climate change mitigation and adaptation were identified as cross-cutting priorities running through the Plan as a whole, rather than isolated policy considerations.
- 7.35 The Plan explicitly recognised that emissions from transport and energy use are central challenges, and that facilitating renewable energy generation and low-carbon infrastructure is essential to addressing these issues
- 7.36 It also emphasised the need to support sustainable economic growth, including green technology sectors, and to deliver infrastructure that enables the transition to electric and low-carbon transport.
- 7.37 These strategic objectives were directly relevant to the proposal, which provides renewable electricity generation to support an operational EV charging hub, thereby contributing simultaneously to energy decarbonisation, transport decarbonisation and the sustainable economy.

Climate Change, Renewable Energy and Transport

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

Environmental Enhancement, Design and Biodiversity

- 7.41 The withdrawn Plan's environmental objectives went beyond impact avoidance and placed strong emphasis on environmental enhancement, including biodiversity net gain, green and blue infrastructure and high-quality design.
- 7.42 The proposal's landscape strategy, ecological mitigation and biodiversity enhancements were consistent with this approach and reflected the withdrawn Plan's recognition that development can play a role in nature recovery when appropriately designed.
- 7.43 Accordingly, while the Local Plan Review has been withdrawn, its strategic direction was a compelling material consideration that lent support to development proposals which advance renewable energy generation, transport decarbonisation and sustainable economic growth. The fact that the Council's performance on housing dragged it down is lamentable in renewable energy and climate terms, leaving a gulf in local planning policy on the matter.

National Planning Policy Framework December 2025 consultation draft

- 7.44 The draft National Planning Policy Framework (December 2025 consultation) is a material consideration to which we attribute limited weight due to its consultation-status, and as a clear and compelling direction of travel from Government, not least the **substantial weight** to

be given to renewable energy generation and the presumption in favour introduced in draft policy S5 which clearly states that:

*“certain forms of development should be approved outside settlements, as set out in the following list. These **should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects**, when assessed against the national decision-making policies in this Framework”*

- 7.45 Those certain forms of development include **energy infrastructure**.
- 7.46 The draft Framework reinforces existing national policy support for renewable and low-carbon energy development, sustainable transport and economic growth within a net-zero context. It strengthens the emphasis on climate change mitigation, transport decarbonisation and the delivery of clean energy infrastructure.
- 7.47 There is nothing within the draft Framework that would undermine the principle of the proposed development. Instead, it reinforces the direction of travel established in the adopted Framework and provides additional support for proposals that deliver renewable energy, enable electric vehicle infrastructure and contribute to a sustainable economy.

Policy N4.2 – Major Development in Protected Landscapes

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

Clean Power 2030 Action Plan December 2024

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

Solar Roadmap June 2025

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

Overarching National Policy Statement for Energy EN1 January 2026

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

National Policy Statement for Renewable Energy Infrastructure EN3 January 2026

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

Planning Practice Guidance

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

British Energy Security Strategy (April 2022)

- 7.59 The British Energy Security Strategy (April 2022) is a material consideration. The Strategy identifies renewable energy, including solar PV, as central to improving the UK’s energy

security, reducing exposure to volatile international energy markets and supporting economic resilience. It recognises solar energy as one of the quickest and most cost-effective technologies to deploy at scale. The proposal contributes to the objectives of the Strategy by delivering domestic renewable electricity generation and reducing reliance on imported fossil fuels. Its role in supporting EV infrastructure further enhances its relevance to the Strategy's ambition to electrify energy demand.

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

- 7.60 The British Energy Security Strategy and the *Powering Up Britain* suite of documents are material considerations that reinforce the strategic importance of domestic renewable energy. These documents identify solar energy as one of the fastest and cheapest forms of electricity generation and emphasise its role in supporting energy security, economic resilience and transport electrification. The proposal contributes positively to these objectives.

Net Zero Strategy: Build Back Greener (October 2021)

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

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

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

Land Use and Food Security Policy

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

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

- 7.64 *A Climate for Change: Adaptation and the National Trust* (2023) is a non-statutory but material consideration that reflects the growing consensus among land managers, conservation bodies and policymakers regarding the urgency of responding to climate change.
- 7.65 The document recognises climate change as one of the greatest long-term threats to landscapes, heritage assets and biodiversity. It makes clear that mitigation, alongside adaptation, is essential if valued landscapes are to be conserved for future generations. The

report acknowledges that renewable energy development has a legitimate role to play in addressing the causes of climate change, provided impacts are carefully managed.

- 7.66 This perspective is material in demonstrating that responding to climate change is not in conflict with long-term landscape protection, but an essential component of it. The proposal contributes to climate change mitigation through renewable energy generation and supports the decarbonisation of transport, thereby aligning with the strategic intent of the report.

Cranborne Chase AONB Management Plan 2019 to 2024

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

Wiltshire Local Transport Plan 4

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

Wiltshire Renewable Energy Study Landscape Sensitivity Assessment 2023

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

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

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

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

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

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

7.76 The document states:

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

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

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- 7.78 The document therefore starts with an unrealistic, uncommercial and out of date category, and ends with a category that is now unreflective, by an order of magnitude, of the size of applications that may soon be coming forwards.
- 7.79 This approach introduces negative bias and skews the Council's approach to assessing ground mounted solar in landscape terms. It is unclear what the imperative is behind the document's approach, it may simply be out of date and out of touch, but if the intention or outcome is/was to deter/resist the installation of schemes at the larger end of the categories, this undermines national policy.
- 7.80 Landscape sensitivity studies are, by their nature, strategic and high-level evidence documents. They are typically prepared to inform plan-making by identifying broad patterns of sensitivity across large areas, rather than to determine the acceptability of individual development proposals. As such, they are not substitutes for site-specific assessment and cannot, in themselves, justify refusal of development.
- 7.81 This distinction is explicitly recognised in national planning policy and guidance, which requires planning applications to be assessed on their individual merits, supported by detailed and proportionate technical evidence. In this case, that evidence is provided through the Landscape and Visual Impact Assessment forming part of the Environmental Statement.

Methodological Limitations

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

Relationship to Site-Specific Assessment

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

-
- and examines cumulative effects in the context of the consented EV hub and other existing infrastructure.

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

Development in Designated Landscapes

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

7.89 The correct approach is one of careful assessment, balancing the statutory purpose of the AONB with the urgent and nationally significant need to deliver renewable energy infrastructure. The Landscape Sensitivity Study does not displace this balancing exercise, nor does it override the requirement to consider site-specific evidence and the particular circumstances of the proposal.

7.90 In this case, the LVIA demonstrates that the proposal's effects on landscape character and visual amenity are limited, localised and appropriately mitigated, and that the scheme does not undermine the special qualities of the AONB.

Weight in the Planning Balance

7.91 For the reasons set out above, the Council's Landscape Sensitivity Study should be afforded limited weight in the determination of this application. It provides background context but does not constitute a policy test, a development management tool, or a definitive assessment of acceptability.

7.92 The planning balance must instead be informed primarily by:

- the detailed findings of the LVIA and Environmental Statement,
- the functional relationship between the solar array and the consented EV hub,
- and the strong national policy support for renewable energy development in pursuit of net zero, energy security and sustainable transport.

7.93 When considered in this way, the Landscape Sensitivity Study does not identify any matter that would outweigh the significant benefits of the proposal or justify refusal.

Material Considerations Conclusion

7.94 Each of the material considerations above reinforces the same central themes:

- the urgency of responding to climate change;
- the need to decarbonise both energy and transport;
- the importance of supporting clean growth and a sustainable economy; and
- the legitimacy of well-designed renewable energy development in sensitive landscapes where impacts are appropriately assessed and mitigated.

7.95 Taken together, they add further positive weight in favour of the proposal and do not identify any conflict that would outweigh its significant public benefits.

8. Planning Balance

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

Planning considerations weighing in favour of the scheme

The Need for Renewable Energy Generation

- 8.3 The scheme would supply 3MW to the EV hub, relieving the national grid by the same amount.
- 8.4 As explained above, there is an urgent and compelling need for this type of development and very strong policy support for solar development to help increase the supply of renewable energy.
- 8.5 The NPPF says that local plans should provide a positive strategy for energy that maximises the potential for suitable development and that plans should consider identifying suitable areas for renewable energy schemes. But that is a not a constraint to solar schemes that are tied to their end user.
- 8.6 In reviewing appeal decisions and SoS decisions since summer 2024, we note that there is very clearly a consistent approach from the Secretary of State and appointed Inspectors in determining solar farm appeals over the last 2 years that either ‘substantial’ or ‘significant’ weight should be given to this benefit. This approach accords with the range of information stressing the urgent and significant need for additional renewable energy generation which we have set out above.
- 8.7 As we have identified above, The Clean Power 2030 Action plan is a key statement of policy from the Government. This includes an objective of creation of essential new energy industries as a key aspect of the overall economic growth plan, targeting specifically 45-47 GW of solar power by 2030.
- 8.8 The scheme would make a fast and locally valuable contribution to this by contributing to the energy demands of the EV hub, and relieving the local network of some of that demand, and this should be given significant (current NPPF) / substantial (incoming NPPF and trend within Inspector decisions) weight in the planning balance.
- 8.9 All parties are in agreement of the urgent need for renewable energy, and the significant or

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

substantial weight that should be given to this scheme's contribution to that increasingly urgent need.

- 8.10 Taking all the above into account, we are of the opinion that, due to the imperative to deliver renewable energy schemes which can assist in decarbonising the UK's transport system, that the benefit of a 3MW solar farm to a leading EV charging hub is a significant benefit that should be afforded significant weight in favour of the grant of planning permission in this case.

Climate Emergency

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

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

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

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

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

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

8.15 At a local level, Wiltshire joined over 300 Local Authorities in England and voted to declare a climate emergency later in February 2019.

8.16 The scheme will contribute towards assessing these declarations of climate emergencies.

8.17 The Clean Power 2030 Action Plan is the latest statement of government underlining the objective of urgently delivering clean energy to limit our contribution to the damaging effects of climate change. The call to act with urgency adds to the weight which we consider would be accorded to the climate emergency.

8.18 By providing a positive, deliverable action on these statements of intent and incomparable quotations, we consider that the declaration of climate emergencies at both national and local level is a material consideration which should afford significant weight in the planning balance; and a contribution to transport decarbonisation in Wiltshire that is a significant benefit.

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

Energy Security

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

8.20 We consider that energy security should be regarded as a material consideration in its own right, one which is separate to the generation of renewable energy per se. This is because of its contribution to national security (reducing reliance on imported energy from volatile international sources). Renewable energy generation by virtue of its contribution to reducing carbon emissions and the drive to decarbonise the electricity system is a separate and distinct type of benefit i.e. there could be an energy security crisis without a climate crisis.

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

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

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

8.22 In the Cutlers Green Lane appeal, in allowing an appeal for a solar farm the Inspector afforded substantial weight to the contribution the development would make to a low carbon economy and the provision of low cost and secure energy. Similarly, in the cases of Kemberton and Great Wheatley Farm the renewable energy benefit of the proposal in terms

of its contribution towards energy security and resilience was afforded “*substantial weight*”. The Southlands decision affords even greater weight to energy security, whereby the Inspector states:

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

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

Good Design

- 8.24 National design policy for all development is provided by the NPPF.
- 8.25 National design policy specifically for renewable and low carbon energy development is contributed to by NPS EN1 and EN3.
- 8.26 Both are material considerations.
- 8.27 The overall design and layout of the scheme has been designed from the outset to minimise harm within the site and wider area, whilst providing significant multiple benefits.
- 8.28 This positive approach to design chimes with that outlined in NPS EN-1, which, such is its importance in considering design, we think bears repeating here (my emphasis):

“4.7 Criteria for good design for Energy Infrastructure

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

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

- 8.29 We have explained above, that a similar dynamic exists at the local level, with ‘generic’ design policy applicable to all forms of development provided in policies ENV1 and ENV10, and design policy specifically for renewable energy development in policy COM11.
- 8.30 In the local design policy tug of war we often find that the ‘generic’ design policies of local plans are ill-suited to the particularities of renewable energy and that we find the policy written for the purpose to be far more useful in decision making.
- 8.31 The scheme will comprise good functional design, utilizing the latest technology including in this case bifacial panels (which can absorb light on both the ‘top’ surface and, to a lesser extent the underside), and the multiple land uses (pastoral farming and BNG) are an efficient

use of land that has the added benefit of returning it to its current use in a better state than it is now.

8.32 We note that at the Honiley appeal the secretary of state and the Inspector considered that the use of efficient technology enabling efficient use of land would be accorded moderate weight in favour of the proposal.

8.33 The NPPF is clear that significant weight should be given to development which reflects local design policies. We remain content that the scheme complies with the design expectations of the local plan policy insofar as they can reasonably be applied, in the context of the national policy statements.

8.34 On the basis that, the scheme represents good design, this is a material consideration of at least moderate benefit to which we attach significant weight in favour of granting planning permission in this case.

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

Access to the Countryside

8.35 The proposals include the new permissive walking route running east-west linking rights of way Chic4 and Chic5.

8.36 Improvements to countryside access benefit health and appreciation of the landscape.

8.37 The extent of the addition to the rights of way network is limited in size but it was a request of the Council's Rights of Way officer so we are content to rank it as a minor benefit, to which we attached a minor level of weight.

Rights of Way				
Benefits	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
		Significant/ substantial/ great		
		Weight		

Air Quality

8.38 Renewable energy reduces greenhouse gas emissions, which drive global warming, but are also harmful to human health more directly.

8.39 This is a clear minor benefit (measurable benefit) to which we apply moderate weight (because its human health).

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

Green Infrastructure Benefits

8.40 We note the landscape mitigation and enhancement works proposed including infilled hedgerow planting, new hedgerow planting, orchard planting and enhancement of field margins.

8.41 Those measures would serve to create a more coherent landscape framework across the site which would deliver a number of minor (at the landscape scale) long-term benefits to which we give moderate weight.

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

Biodiversity and Net Gain

8.42 There is an ecological emergency and the UK is the most nature depleted countries in the world⁵. Responding to an emergency should be given significant weight in support, and we are not alone in thinking this. With regard to the weight recently attached at other solar PV appeals to net gains in excess of the 10% minimum, we note the following:

- Halse Road, Greatworth a net gain of 71% in habitat units and 33% in hedgerow units was attributed 'significant weight'.
- Bishops Itchington the level of BNG (which was unspecified) attracted 'significant weight'.
- Halloughton a net gain of 73% was given 'significant weight'.

8.43 Going beyond the development statistics, the Journal of Nature has said that climate change is "*Doubling the number of [species] at risk of extinction*" and the Smithsonian has stated that climate change is "*Accelerating the Earth's sixth mass extinction*".

8.44 The Landscape Institute is clear that "*We all, individually and professionally, have a role to play in addressing this crisis*".

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

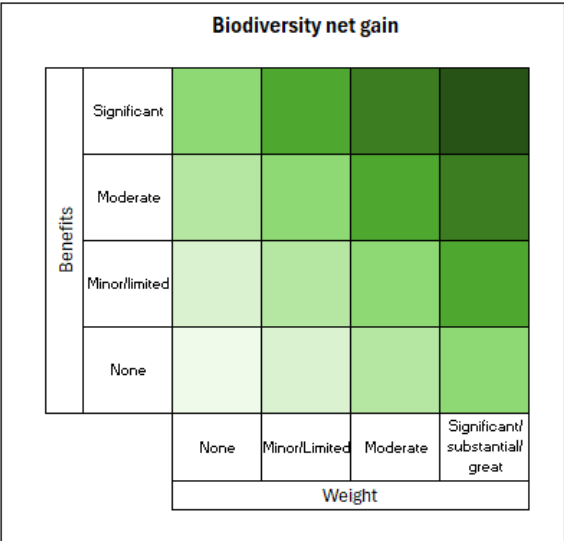
8.46 The State of Nature Report is very clear that "*The UK distributions of 4,979 invertebrate species have on average decreased by 13% since 1970*" and "*Nature needs space to live and flourish, but around the globe we humans have decreased and diminished those spaces. This is especially the case in the UK. There are substantial negative consequences of living in a nature-depleted country. These include impacts on human health, and direct costs associated with adaptation to lost and damaged ecosystem services. For example, pollinating insects are*

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

worth millions of pounds to UK agriculture, and their population declines threaten food production” and “the UK is now one of the most nature-depleted countries on Earth”.

8.47 In the context of a biodiversity crisis, sometimes referred to as ‘the sixth mass extinction’, we give the benefits of exceeding BNG a significant level of benefit to which significant weight should be applied and we do not find doing so is overplaying the topic at all.

Economic Development



8.48 NPPF paragraph 85 states that: “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity”. NPPF paragraph 87 is clear that: “Planning policies and decisions should recognise and address the specific locational requirements of different sectors”.The recent Bewley Homes judgement has clarified that this does not necessarily translate to a generic significant weighting to all economic development but requires justification.

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

8.50 We also contend that the vital nature of these considerations affords significant weight to be given in support of the economic development associated with renewable energy as a matter of principle when viewed through the prism of the government’s aspirations for a ‘green industrial revolution’.

8.51 Footnote 43 to paragraph 85 of the NPPF directs the reader to ‘Invest 2035: The UK’s Modern Industrial Strategy’ which identifies **priority sectors for growth** which includes ‘**clean energy industries**’.The Modern Industrial Strategy links to the UKs Clean Growth Strategy 2017. Both the Industrial and Clean Growth strategies link to the British Energy Security Strategy 2022, and beyond that to Powering Up Britain Net Zero Growth Plan.

8.52 Clean Power 2030 Action Plan 2024 (pages 20, 43 and 44) identifies significant beneficial impact for businesses from clean power, including price stability, market certainty encouraging investment and job opportunity. The Action Plan places the clean energy industries as a priority growth sector as part of the Government’s Industrial Strategy. Clean energy is noted as creating employment and delivering price stability with is crucial for businesses.

8.53 Not only does the renewables industry generate significant revenue for the UK economy, but it is also an engine of green skills and education, and a key part of the government's wider strategy for economic recovery and onward green growth. It follows that the weight to be given by decision makers to economic development generated by the renewables industry in support of sustainable transport and transport decarbonisation is significant, regardless of the size of the proposal, because even small-scale projects provide a valuable contribution to significantly cutting greenhouse gas emissions, boosting the green economy and upskilling the UK low carbon and renewable energy workforce.

8.54 In this case a moderate level of benefit accrues to the green economy which requires constant investment, innovation and support, to which significant weight should be applied.

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

Farm Diversification

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

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

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

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

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

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

BMV Soil/Land

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

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

Planning considerations weighing against the scheme

BMV Policy

- 8.62 The NPPF paragraph 187 states “Planning policies and decisions should contribute to and enhance the natural and local environment by: [amongst other things] b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”.
- 8.63 The Wiltshire Core Strategy is clear that old saved local plan policy C19 is superseded by national policy and Core Policy 42 for stand alone renewable energy only requires BMV land to be “taken into account”.
- 8.64 The ALC grade of the solar site has been assessed as likely Grade 3a.
- 8.65 Whilst national policy and guidance emphasises the conservation of BMV land as a finite resource for the future and encourages the use of areas of poorer quality land in preference to those of higher quality, this BMV land will not be lost, it will be conserved for future generations because it will be returned to full agricultural use in the future in at least the same condition as it is now.
- 8.66 Therefore, on a very precautionary basis, one might say there is a minor level of harm to BMV policy imperatives, to which we only give minor weight because the harm, if there is any, is to policy, not the actual BMV soil reserve itself.

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

Effect on Landscape

- 8.67 The landscape is under threat from climate change. This is acknowledged by no less than the

Landscape Institute, the RTPI and the TCPA. Whether this be by biodiversity and habitat loss, or unpredictable and potentially adverse changes to 'English' landscape character.

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

8.69 We acknowledge the weight given to landscape conservation in the NPPF, and that this is often translated by decision makers into 'weight to harm'.

8.70 We note that harm arising from the proposal would diminish as the proposed landscape mitigation planting matures. On this basis we assert a precautionary moderate level of harm to which we give great weight.

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

Effect on Visual Amenity

8.71 The submitted LVIA is clear that impacts to visual amenity range from major-moderate in views close to the site, to limited elsewhere.

8.72 We consider that these matters could be afforded great weight because the landscape is designated and the expectations of walkers might be higher than elsewhere. We also note that the development will often be regarded in the context of the A303, the EV hub and the electricity transmission wires that cross the site.

8.73 On these grounds the harm is reduced to moderate, and on a precautionary basis the from great to moderate.

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

Heritage

8.74 The submitted heritage impact assessment, geophysical survey and archaeology desk based assessment are clear that if there is any impact to heritage,

8.75 it is less than substantial and at the lower end of that range. The NPPF gives substantial weight to conserving the historic environment which is often translated by decision makers into 'weight to harm'. On a very precautionary basis we afford a limited level of harm to heritage, to which we apply substantial weight.

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

Planning consideration that are neutral in the balance

Highways and access

- 8.76 Access to the site is via the approved EV hub. The submitted Construction and Operation Transport Management Plan is clear that *“the Development is acceptable in transport terms and meets the local and national policy objectives. The COTMP demonstrates that there are no residual impacts in terms of highway safety or the operational capacity of the surrounding highway and transport networks and therefore planning permission should not be withheld on transport grounds”*. We are therefore content that there is no harm to highways, traffic and transport. Indeed, using the existing access is a minor benefit. The overall highways implication is judged to be neutral.

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

Amenity

- 8.77 The submitted Glint and Glare report is clear that “No significant impacts are predicted upon road safety, residential amenity and aviation activity. Mitigation is not recommended”. On that basis we are content that there are no amenity impacts and the implications to amenity are neutral.

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

Flood and drainage

- 8.78 The submitted drainage report is clear that:

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

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

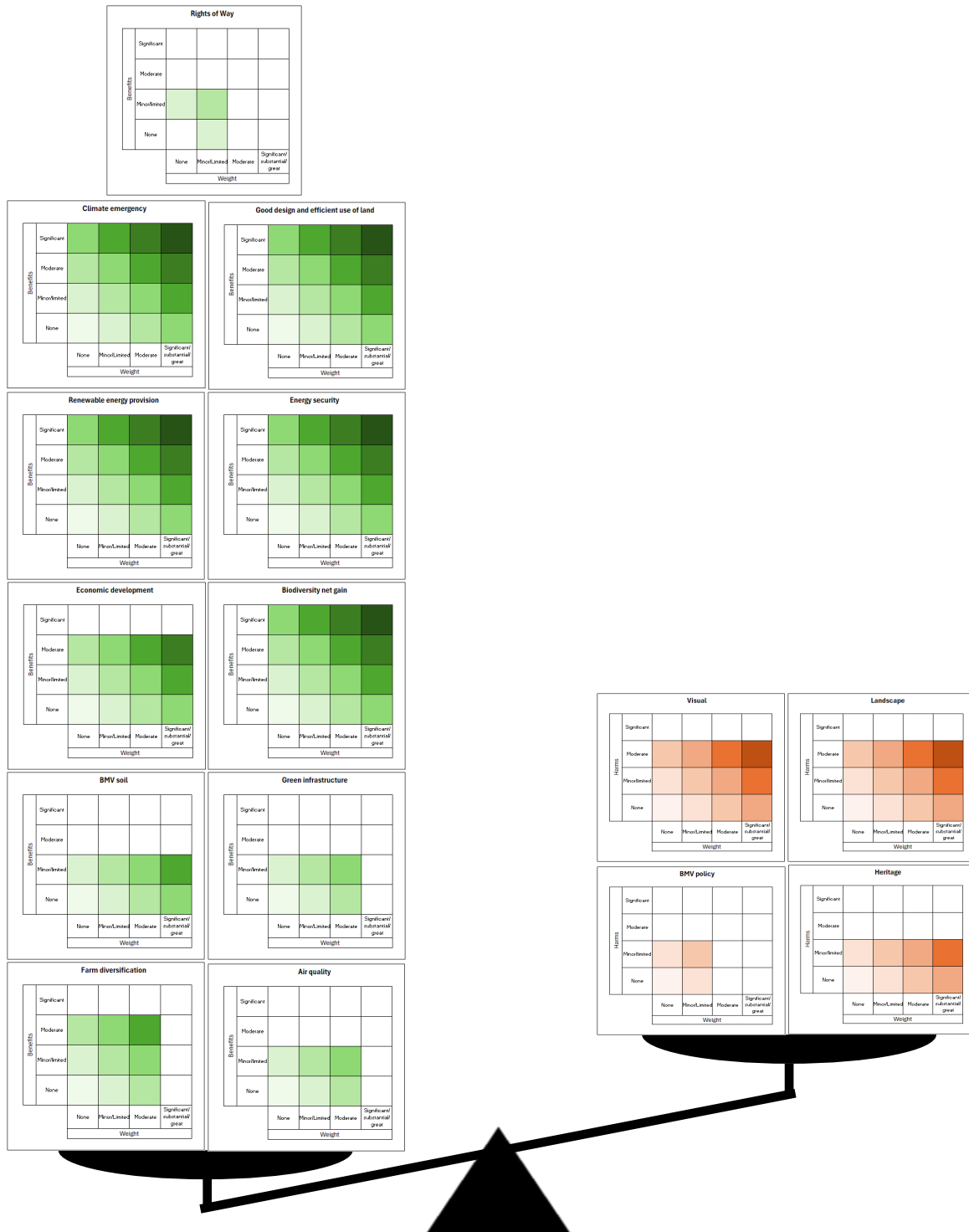
- 8.79 On this basis we are content that, on a very precautionary basis, there are very limited impact to flood and drainage, minor benefits if the site is actively managed for drainage (compared to its current unmanaged status) and overall the implications to flood and drainage are neutral.

Overall balance

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

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

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



9. Conclusion

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

Appendix 1

Topic	Public comments	Where matter was already provided or is responded to now	Applicant's response
National Landscape / AONB and visual impact	Objectors consider the solar farm unacceptable within the Cranborne Chase National Landscape/AONB, describing it as visually intrusive, industrialising open countryside and harmful to views from the A303, nearby properties and rights of way.	Original submission - already addressed: Already addressed in the original submission: LVIA Report; LVIA Diagrams/Photographs Appendices; Landscape Strategy; ES Volume 1, Chapter 8; and the original PDAS. These documents assessed landscape character, visual receptors, viewpoints, mitigation planting, residual effects and the planning balance within the National Landscape context. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: amended LVIA Report_P4, LVIA Appendix 2 Diagrams, Landscape Framework Plan_P6 and Chicklade PDAS addendum, particularly Design and Access, Development in Designated Landscapes, Paragraph 190 - Major Development in National Landscapes, and Planning Balance. The addendum refines the response; the basic landscape/visual assessment was not absent from the original submission.	The objection treats the designation as an automatic bar to development. The planning statement paragraph 2.9 gave two examples of solar farms elsewhere in the AONB. That is not the correct planning test. The LVIA and ES openly acknowledge adverse landscape and visual effects, including localised major/moderate effects, but assess them in context: a site influenced by the A303 corridor and the consented EV hub, with existing/proposed vegetation, retained field boundaries, new hedgerow, woodland/orchard planting and reversibility at decommissioning. The submitted evidence therefore addresses the issue directly rather than ignoring it.
Number of chargers at the EV hub	Objectors incorrectly claim that the EV hub is somehow limited to 13 chargers.	Planning permission 2022/06298 and Condition 29 is clear this claim is wrong: No. of EV bays shown on approved plan = 25 No. of EV bays that Condition 29 encourages = 49 No. of non-EV bays that PD rights facilitate for EV use = 35	The claim that the original EV hub was somehow limited to 13 EV chargers is incorrect, and is an incorrect claim repeated throughout commentary on planning application 2025/10020, likely stemming from a single source. That claim has found its way into this application and remains incorrect; a symptom of relying on individuals for information.

Topic	Public comments	Where matter was already provided or is responded to now	Applicant's response
Need, scale, EV hub link and public interest	Several comments question whether a solar array of this scale is needed for the EV hub and suggest the scheme is disproportionate or commercially driven rather than necessary.	Original submission - already addressed: Already addressed in the original submission: original PDAS sections 1, 6 and 7 and ES Volume 1, Chapter 7 explained the private-wire relationship with the consented EV charging hub, renewable-energy benefits, carbon savings, electricity generation and the public-interest case. ES Volume 1 also identified the annual generation and EV hub demand position, including export of surplus renewable electricity. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: Chicklade PDAS addendum, including Re-Introduction, Material Considerations, NPPF 168, Paragraph 190(a) and Planning Balance. The addendum provides further policy justification; the need/public-interest case was already set out in the original submission.	The comments questioning need do not correctly engage with the submitted private-wire case. The PDAS and ES explain the functional relationship with the consented EV charging hub, the annual generation/demand position, carbon savings and transport-decarbonisation benefits. The scheme is not required to prove a general national need for renewable energy; national policy already gives strong support to renewable generation and EV infrastructure. Surplus export does not undermine the EV hub link.
Alternative sites, rooftops and brownfield options	A recurring point is that panels should be on roofs, within the EV hub, on brownfield land or outside the protected landscape, rather than on an adjoining agricultural field.	Original submission - already addressed: Already addressed in the original submission: original PDAS sections 3 and 6 explained the site-selection rationale, co-location with the EV hub, land availability, connection/private-wire considerations and why a ground-mounted array was proposed. ES Volume 1 accounted for roof-mounted solar at the EV hub as part of the wider scheme context. Amendment / addendum documents - further clarification or update:	Aerial photography indicates that no-one in Chicklade has installed their own rooftop solar. The repeated suggestion to 'put it on roofs' overlooks the Government's publication Solar Roadmap which is referenced multiple times in the Planning Statement is perfectly clear that even on the most optimistic projections, rooftop solar on its own would be nowhere near sufficient to meet targets and need. Ground-mounted solar necessarily requires open land, and the chosen site is explained by proximity to the EV hub,

Topic	Public comments	Where matter was already provided or is responded to now	Applicant's response
		Further clarified/updated in the addendum material: Chicklade PDAS addendum under Design and Access, Paragraph 190(b), National Policy Statement EN-3 and Planning Practice Guidance. ALC June 2026, section 8, also addresses the use of poorer-quality land in preference. The addendum strengthens the alternatives response; it does not mean the issue was unaddressed originally.	private-wire efficiency, land availability, solar resource, topography and constraints. The reports do not claim there is no other land anywhere; they explain why this location is a reasonable and policy-compliant option for this specific linked scheme.
Agricultural land, BMV and food production	Many comments object to the use of productive farmland, particularly Subgrade 3a Best and Most Versatile land, and raise broader food-security concerns.	Original submission - already addressed: Already addressed in the original submission: original ALC report, original PDAS section 4 and ES Volume 2, Appendix 2 assessed agricultural land classification, the policy context and soil/agricultural considerations. The original submission therefore already identified and considered the BMV issue. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: ALC June 2026, especially sections 3-9 and appendices, and Chicklade PDAS addendum under Outcomes of Surveys and Planning Balance. The addendum sets out the Subgrade 3a/3b split, explains that there is no absolute policy bar to BMV land, considers poorer-quality land, and addresses temporary use, soil management, reversibility and restoration after decommissioning.	The BMV point was expressly assessed. The ALC material identifies the 3a/3b split and explains that planning policy does not prohibit use of BMV land – appeals precedent is clear on this. The proposal is temporary and reversible, the land quality is not permanently 'lost', the physical ground disturbance is limited, and agricultural use can continue through grazing. In fact, almost zero land is 'lost' at all. Generalised food-security objections are not supported by evidence, the scale of the scheme or by the ALC assessment, which concludes that agricultural matters should not prevent the development.
Cumulative impact, precedent and future expansion	Residents are concerned that the proposal adds to the approved service	Original submission - already addressed: Already addressed in the original submission: ES Volume 1, Chapter 9 assessed cumulative	The comments largely speculate about future expansion or precedent with zero evidence. The application must be determined on the submitted

Topic	Public comments	Where matter was already provided or is responded to now	Applicant's response
	station/EV hub, may set a precedent for further solar development and could later expand across the wider red-line land.	effects, including the consented EV hub/service-station context. The original LVIA and PDAS also considered the scheme in its landscape and infrastructure context. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: amended LVIA Report_P4 and Chicklade PDAS addendum assess the current scheme in the context of the A303 corridor, the consented EV hub and nearby infrastructure. Speculation about future expansion is not the application before the Council; any later materially different proposal would require its own planning process.	scheme. ES Chapter 9 assessed cumulative effects, including the EV hub context, and identified no constructed, approved or committed field-mounted solar arrays in the study area and no significant residual cumulative/in-combination effects. Any future enlarged scheme would require its own planning application and assessment; it is not a valid reason to refuse the present proposal.
Residential amenity, noise, tranquility, health and EMF	Some comments raise concerns about transformer/inverter noise, low-frequency sound, construction disturbance, health and wellbeing, EMF and the effect on tranquility over the 40-year operational period.	Original submission - already addressed: Already addressed in the original submission: original PDAS addressed Core Policy 51, National Landscape special qualities, operational character and amenity; the original COTMP addressed construction-stage controls; and ES Volume 2 recorded the Public Protection noise scoping point. The original submitted material did not leave operational character and construction management unconsidered. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: Chicklade PDAS addendum and COTMPlan 01A, especially sections 5-6, address the operational position and construction controls including noise, dust, dirt, complaints and site	The comments assume industrial-type amenity harm without demonstrating it from the proposal. The submitted material describes a low-intensity solar use with no normal operational lighting, no moving parts and minimal operational visits. Construction dust, noise, complaints and neighbour liaison are addressed through the COTMP. Glint/glare towards dwellings is assessed separately and found to result in no predicted impact after screening. No BESS is proposed. EMF is raised in comments but no evidence is provided to show that this solar infrastructure would create an unacceptable planning impact. The Government's publication Solar Roadmap (referenced multiple times in the Planning

Topic	Public comments	Where matter was already provided or is responded to now	Applicant's response
		management. The scheme is described as essentially silent, unlit in normal operation and having no moving parts. I have not identified a standalone EMF assessment in the supplied original or addendum documents.	Statement) is clear in its Appendix 2 'Common Misconceptions' that " <i>They [solar farms] operate almost silently</i> ".
Highway safety, access and A303 traffic	Several comments refer to the A303 as busy or accident-prone, object to additional traffic and question whether the revised access and EV hub traffic have been properly assessed.	Original submission - already addressed: Already addressed in the original submission: the original COTMP and ES Volume 1 provided the baseline transport/construction traffic position and assessed the scheme originally submitted. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: COTMP Plan 01A is the key document for the revised access arrangement, especially sections 3-7 and Appendices A-F. It updates the construction route, access strategy, vehicle types, delivery numbers, visibility and swept-path evidence. The Chicklade PDAS addendum Design and Access section also reflects the revised access via Seymour Farm/north of Chicklade Crossroads. This is a genuine amendment point, so the updated COTMP is the primary reference.	According to the Dept. for Transport data, the A303 at Chicklade sees in excess of 20,000 annual average daily flows. According to CrashMap the stretch of the A303 near the site has only seen 3 recorded slight personal-injury collisions in the current 5-year period 2024 to 2020. Claims that "<i>The A303 around Chicklade is already an accident black spot</i>" are not based in evidence. Several objections conflate the EV hub traffic with the solar farm. The solar development has a short construction phase and negligible operational traffic. The updated COTMP identifies 184 two-way HGV movements over about two months, around four two-way HGV movements per day, with peak-hour avoidance, a booking system, banksmen, signage, wheel-washing and route controls. The revised access has been supported in principle by National Highways subject to a CTMP, and visibility/ swept-path evidence is provided. The comments do not displace that technical highway evidence.
Ecology, biodiversity and wildlife movement	Objectors refer to potential impacts on wildlife habitats, badgers, deer,	Original submission - already addressed: Already addressed in the original submission: original PEA/BMA and ES Volume 1, Chapter 6	The ecology objections are mostly unsupported and un evidenced assertions. The PEA/BMA specifically assessed habitats and

Topic	Public comments	Where matter was already provided or is responded to now	Applicant's response
	birds, bats, reptiles and animal movement corridors, as well as biodiversity disruption.	assessed habitats, protected species, hedgerows, lighting, mitigation and biodiversity net gain. These wildlife/ecology matters were therefore already covered by specialist reporting. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: amended PEA & BMA rev01B, especially sections 1, 5 and 6, and Landscape Framework Plan_P6. The amended ecology report records species receptors, limited hedgerow removal, no proposed lighting, mitigation/compensation/enhancement measures and Biodiversity Metric results of +143.69% area habitat units and +84.12% hedgerow units.	protected/species receptors, including bats, badgers, birds, dormouse, hedgehog, reptiles and other mammals. It identifies limited baseline ecological value, no proposed lighting, retention of most hedgerows, mitigation/compensation/enhancement measures and substantial biodiversity net gain. The amended metric shows +143.69% area habitat units and +84.12% hedgerow units. The submitted survey evidence is therefore materially stronger than the unsupported public comments.
Trees, hedgerows and screening mitigation	Comments question whether planting and screening will be effective, and some note that mitigation may take many years to mature.	Original submission - already addressed: Already addressed in the original submission: original arboricultural assessment, LVIA and Landscape Strategy addressed existing boundary vegetation, hedgerow retention/removal, proposed native hedgerow planting, woodland/orchard planting, tree protection and landscape mitigation. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: AIA May 2026, amended LVIA Report_P4 section 5 and Landscape Framework Plan_P6. The amended documents identify that no trees are proposed for removal, only limited sections of C-grade hedgerow are required for access, and new planting is	The arboricultural objection is addressed by the AIA and landscape documents. No trees are proposed for removal and no facilitative pruning is required. The works involve only limited removal of C-grade hedgerow sections for access, with tree-protection fencing, supervision and replacement/enhancement planting. The Landscape Framework provides new native hedgerow, orchard/woodland and meadow planting. While planting takes time to mature, that is already accounted for in the LVIA's time-based assessment of residual visual effects.

Topic	Public comments	Where matter was already provided or is responded to now	Applicant's response
		secured as visual mitigation and biodiversity enhancement.	
Glint, glare, aviation, lighting and dark skies	Comments raise possible glare towards homes, the A303, drivers, aircraft/helicopters and the Dark Sky designation, together with concerns about security lighting and sky glow.	Original submission - already addressed: Already addressed in the original submission: original Glint and Glare Study and original PDAS section 4 assessed road safety, residential amenity, aviation receptors and operational lighting/dark-sky matters. The original documents therefore already responded to the broad glare and lighting points. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: Glint and Glare v4, especially the executive conclusions, section 5 for roads/dwellings, section 6 for aviation and section 7 for conclusions, with appendices containing detailed modelling. PDAS addendum and LVIA material also address lighting/dark-sky matters, noting that the scheme is not normally lit, with only a small personnel light on the transformer-station door for rare maintenance visits. The supplied glint/glare documents assess aviation receptors/airfields; they do not appear to contain a separate MOD low-flying or NVG assessment.	Glint and glare has not been ignored: it has been modelled by a specialist consultant for roads, dwellings and aviation receptors. The assessment predicts no significant impacts on the A303, residential amenity or aviation activity, and no mitigation is recommended beyond the screening already considered. The scheme is not normally lit; the documents refer only to a single personnel light at the transformer station for rare maintenance visits. Comments about widespread lighting, sky glow or unassessed glare are not borne out by the submitted documents.
Battery storage, fire risk, contamination and drainage	Some comments refer to lithium-ion battery storage, fire risk, toxic contamination, watercourse pollution, drainage and	Original submission - already addressed: Already addressed in the original submission: the original FRA and original COTMP assessed flood risk, drainage, runoff, pollution prevention and construction management. ES Volume 2 also recorded that Battery Energy Storage Systems were not part of	A number of comments proceed on an incorrect premise by referring to lithium-ion battery storage. The submitted scheme is not a BESS-led proposal. Flood risk and drainage are addressed in the FRA, which identifies Flood Zone 1, no watercourses on or adjacent to

Topic	Public comments	Where matter was already provided or is responded to now	Applicant's response
	surface-water impacts.	the scoping report/proposal, so a number of battery/fire comments proceed from an incorrect premise. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: FRA_RevA, especially sections 3-6 and 7, addresses flood risk, runoff, groundwater and soil permeability; COTMPlan 01A, section 6, addresses construction waste, fuel, mud, dust and pollution-control measures. The application remains for a solar array with transformer/substation and associated infrastructure, not a BESS-led scheme.	the site, low surface-water and groundwater risk, soil management and a precautionary cut-off swale. Construction-stage pollution, waste, fuel, mud and wheel-washing controls are addressed in the COTMP. The comments therefore overstate risks that have either been assessed or are not part of the proposal.
Heritage, archaeology and historic features	Comments refer to Great Ridge, the Roman Road, Cratt's Hill/plane-crash memorial, listed buildings, scheduled monuments and the historic character of the surrounding landscape.	Original submission - already addressed: Already addressed in the original submission: original HIA, original Archaeological Assessment and ES Volume 1 assessed designated and non-designated heritage assets, including Chicklade House, the Church of All Saints, Burnett Monument, scheduled monuments, Great Ridge-related assets and the Roman Road. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: HIA rev1, Archaeological Assessment April 2026 and amended LVIA Report_P4 baseline sections 4.24-4.29. The documents conclude that relevant heritage settings are not sensitive to the proposed change or have no harmful intervisibility, and that archaeological potential/effects are low or limited, subject to the assessment findings.	The heritage comments do not identify a specific unassessed asset. The HIA considers Chicklade House, the Church of All Saints, the Burnett Monument, scheduled/non-designated assets and wider setting issues, concluding no identified harm to significance from the proposal. The Archaeological Assessment also considers cropmarks and archaeological potential, finding limited/low potential overall and limited ground-breaking due to the nature of solar development. The existence of historic features nearby is not, of itself, evidence of unacceptable heritage harm.

Topic	Public comments	Where matter was already provided or is responded to now	Applicant's response
Public rights of way and recreational enjoyment	Several comments refer to walkers, bridleways, Ox Drove, Monarch's Way, Wessex Ridgeway and the enjoyment of open countryside.	Original submission - already addressed: Already addressed in the original submission: original LVIA and ES Volume 1, Chapter 8 assessed public rights of way and recreational visual receptors. The closest bridleway users were identified as experiencing the greatest visual effects, with more distant routes such as the Monarch's Way/Wessex Ridgeway addressed separately. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: amended LVIA Report_P4, particularly section 7 on visual effects for roads, bridleways, restricted byways and long-distance routes, and section 8 summary. Chicklade PDAS addendum Design and Access and Landscape Framework Plan_P6 also identify the proposed permissive footpath linking existing routes.	The LVIA specifically assesses the public rights of way and long-distance routes raised in the comments. It accepts that the greatest effects occur close to the site, especially on the western bridleway and southern bridleway/restricted byway, but also records that effects are localised, reduce as planting establishes and are limited or absent on more distant routes such as the Monarch's Way and Wessex Ridgeway. The amendment material also includes a permissive footpath link; an additional benefit to the scheme, and one that will support locals access to the countryside. The public comments repeat matters but do not add new evidence.
Consultation and community engagement	Some residents say the solar farm was not previously explained to the community, that consultation was limited, or that people east of the site were not informed.	Original submission - already addressed: Already addressed in the original submission in part: ES Volume 2 contained the EIA scoping opinion and consultation responses from statutory and technical consultees, including National Highways, Wiltshire Council officers, Rights of Way, Ecology, Archaeology, Drainage and Natural England. Neighbour notification and statutory publicity are primarily matters for the Local Planning Authority, not a specialist technical report. Amendment / addendum documents - further clarification or update:	Consultation complaints are mainly procedural rather than technical. Enviromena met with the village objectors coordinator. Statutory publicity and neighbour notification are matters for the Local Planning Authority. In any event, the original application was accompanied by the technical reports, ES and PDAS now being referred to in this table, and the addendum package responds to officer/consultee engagement through design changes including revised access and a permissive footpath.

Topic	Public comments	Where matter was already provided or is responded to now	Applicant's response
		Further clarified/updated in the addendum material: Chicklade PDAS addendum explains design iteration following engagement with the Local Planning Authority and Rights of Way officer, including the amended red line, revised access and permissive footpath. This does not change the fact that statutory publicity is controlled by the LPA consultation process.	Alleged lack of awareness does not mean the planning issues were unassessed through the submission of a range of reports and surveys which appears to have gone unread in the main.
Renewable energy support and community benefit	One comment supports the principle of private-wire renewable generation for the EV hub and suggests possible community ownership or local community benefit.	Original submission - already addressed: Already addressed in the original submission: original PDAS and ES Volume 1 explained the renewable-energy, EV-infrastructure, transport-decarbonisation, carbon-saving and planning-balance benefits of the private-wire connection. Amendment / addendum documents - further clarification or update: Further clarified/updated in the addendum material: Chicklade PDAS addendum updates the climate-change, public-interest and planning-balance case. The specific suggestion of community ownership/funding is not part of the supplied application documents but can be acknowledged as a supportive representation rather than an objection requiring technical rebuttal.	There is, unfortunately, little in the tone of the objections to suggest that Chicklade villages are in any supportive of renewable energy proposals such as this, let alone seriously interested in community ownership. Aerial photography indicates that no-one in Chicklade has installed their own rooftop solar. The supportive comment aligns with the submitted case: renewable generation linked by private wire to strategic EV charging infrastructure delivers carbon and transport-decarbonisation benefits.

Appendix 2

Appeal Decision

Hearing held on 13-14 May 2026

Site visits made on 12 and 14 May 2026

by Toby Gethin BA (Hons), MSc, MRTPI

an Inspector appointed by the Secretary of State

Decision date: 11 June 2026

Appeal Ref: 6002358

Land at Lower Wyke, St Mary Bourne SP11 6AW

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Marcus Camm, BSR Energy Limited, against the decision of Basingstoke and Deane Borough Council.
 - The application Ref is 23/02000/FUL.
 - The development proposed is The development of ground mounted solar photovoltaic array, with associated infrastructure, security fencing, CCTV, associated cable route, private and DNO substations, landscaping and onsite biodiversity net gain.
-

Decision

1. The appeal is allowed and planning permission is granted for The development of ground mounted solar photovoltaic array, with associated infrastructure, security fencing, CCTV, associated cable route, private and DNO substations, landscaping and onsite biodiversity net gain at Land at Lower Wyke, St Mary Bourne SP11 6AW in accordance with the terms of the application, Ref 23/02000/FUL, and subject to the conditions set out in the schedule to this decision.

Preliminary Matters

2. The appeal site is within the North Wessex Downs National Landscape (NL). Section 85 of the Countryside and Rights of Way Act 2000 (as amended) therefore places a duty on me to seek to further the purpose of conserving and enhancing the natural beauty of the area.
3. After the Council made its decision on the planning application, a new version of the North Wessex Downs Management Plan (NWDMP), covering the period 2025-2030, was adopted. As this document replaces the previous version, I have had regard to it in determining the appeal.
4. The proposed development falls under schedule 2 of the Environmental Impact Assessment (EIA) Regulations 2017, is within a 'sensitive area' as defined in Regulation 2(1) and exceeds the applicable threshold. The screening opinion from the local planning authority found that the development proposed constitutes EIA development. In accordance with the EIA Regulations, an Environmental Statement (ES) was therefore produced.
5. My decision has taken into account the ES, including the likely significant environmental effects together with the mitigation measures proposed to avoid, prevent, reduce and offset the effects of the project; and all other environmental information submitted in connection with the appeal, including that arising from

questioning at the hearing. I have also had regard to the results of consultations undertaken with statutory consultation bodies and other interested parties.

6. Amended plans covering the solar park layout, mounting system and CCTV detail were submitted with the appeal. Shortly before the hearing, the appellant also submitted an updated 'Technical Note – National Landscape' (TN). These documents clearly include some changes and updated details compared to the scheme that was considered by the Council and by interested parties at the application stage. However, the amendments proposed to the scheme are not significant and would not fundamentally change the development proposed or result in a substantial difference from that originally applied for; and the TN is an update on the previous version and addresses the latest NWDMP and the associated North Wessex Downs Landscape Character Assessment (NWDLCA).
7. Accordingly, considering the appeal with regards to the amended plans and updated TN would neither cause procedural unfairness nor prejudice third parties' interests. The Council also confirmed before and during the hearing that it had no objections to the updated TN or the amended plans being considered as part of the appeal. In addition, I am satisfied that the amended plans and updated Note do not invalidate the findings of the ES. I have therefore determined the appeal based on the amended plans and the updated TN.

Main Issues

8. The main issues are:
 - the effect of the proposed development on the landscape and visual amenity of the surrounding area and the NL;
 - whether there are exceptional circumstances and whether it would be in the public interest; and
 - the effect of the proposed development on historic heritage assets.

Reasons

9. Amongst other aspects, the proposed development would include ground-mounted solar photovoltaic arrays (solar panels) over approximately 35 hectares of farmland; associated electrical infrastructure including inverters/transformers and switchgear; an on-site connection to the existing electricity network; access tracks; security fencing; and pole mounted CCTV cameras. The ES sets out the various mitigation measures intended to avoid, prevent, reduce or offset significant adverse effects of the development.
10. In terms of mitigation relevant to the main issues above, the embedded measures (through project design) include minimal hedgerow removal with the remaining hedgerows and trees being retained and managed; and offsetting the panels from higher ground in the eastern part of the site, properties within Mulberry Court, the Devil's Ditch Scheduled Monument and its non-designated archaeological features. Additional mitigation includes restoring and enhancing existing hedgerows where there are gaps; allowing hedgerows to grow to a height of 3-4 metres; and hedgerow and tree planting. With the submitted landscape masterplan providing an indicative overview of some of these measures, the additional mitigation measures would need to be secured by condition.

Landscape and visual amenity

11. Consisting of part of three relatively large arable fields surrounded and separated by hedgerows, the appeal site positively contributes to its rural surroundings. The site is within the North Wessex Downs NL, which is a valued and highly sensitive landscape, and falls within several landscape character areas (LCAs) at national, county and local levels. Often identifying similar features, the LCAs of most relevance to considering the landscape and visual effects of the proposed development are Wyke Down (LCA 11, in the Basingstoke and Deane Landscape Assessment, 2021) and Litchfield Downs (LCA 2F, in the NWDLCA).
12. The submitted evidence identifies LCA 11 as being defined by gently undulating landscapes and characterised by a medium to large-scale mosaic of arable farmland with a semi-enclosed character resulting from woodland blocks and relatively strong hedgerows. Combined with its clay plateau landscape in the north-west merging into the lower lying chalkland, it has a discernible sense of place; and with its sparse settlement pattern and distance from large settlements, it is a largely quiet, rural area.
13. LCA 2F is within the Downlands with Woodland landscape character type, which is identified in the NWDLCA as a deeply rural landscape defined by contrast, particularly between open expansive rolling downland and enclosed woodland. Litchfield Downs is regarded as forming a transitional unit between the enclosed wooded landscape to the west and the elevated plateau to the east; and with its more wooded and enclosed downs in the west and the sweeping open arable downs in the east, LCA 2F reflects this. The valued qualities of Litchfield Downs include strong sweeping chalk topography with smooth summits, dissected by valleys; its wooded character derived from scattered woodlands and a strong hedgerow network; the distinctive landscape feature of linear planting, including along the Portway Roman Road; its contrasting nature between generally enclosed intimate views and panoramic longer-distance views to the east with a strong sense of exposure and expansiveness; and its quiet rural (and sometimes remote) character and sparsely populated landscape.
14. With regards to the NL, the latest NWDMP does not include a list of its special qualities. Instead, the NWDLCA identifies various valued qualities for each of the NL's LCAs. With respect to the site's position within the NL, the relevant qualities are identified above, with reference to LCA 2F. However, in relation to the NL more generally, the Council's Committee Report describes it as one of the most expansive, open and relatively remote protected landscapes in the south of England; and identifies its natural beauty as largely emerging from the characteristic open downland landscapes, with long views of scenic landscapes, with little visual or noise disturbance. Echoing this, the Council set out at the hearing that the main or most significant characteristics of the NL overall include its undulating chalk downland, expansive views, and intense and long-distance public rights of way network. The area's historic heritage, including the roman road and Devil's Ditch earthwork, were also highlighted as informing the field pattern.
15. With its distinctly rural nature, strong linear hedgerows, gently undulating topography and generally medium-scale chalk fields, the site reflects several of the above characteristics of the LCAs and NL. Albeit on a lesser scale than other areas in the wider area, it also has a contrasting sense of semi openness and (due to its hedges) enclosure. However, with the site extending over a reasonably large

area, the southern section is more influenced by the presence of man-made features. This includes the pylons and overhead power lines that cross the site, as well as various built form on the other side of the adjacent railway cutting. Whilst other development such as the narrow roads and scattered farmsteads may merge more fluidly with the rural landscape, the above features are notable exceptions and mean that the southern part of the site cannot reasonably be described as having a remote and particularly quiet, unspoilt or tranquil character. With its gentle undulations and crests, the site does also not strongly exhibit several of the other the special qualities of LCA 2F or the wider NL, including with respect to strong sweeping landscape undulations and characteristic smooth summits for example, whilst views are also limited by the nearby ridge.

16. I recognise that the main parties concur that the site is a valued landscape, as per the National Planning Policy Framework (Framework) phraseology, and the Council agrees with the AONB office that the site is not mere countryside. The site's edge position and the greater presence of built form in its southern section mean it is also vulnerable to being regarded as less important than other land within the NL. However, its position in a transitional landscape and on the edge of the NL does not inherently mean that the site is clearly more than ordinary countryside or of a notably higher value and more vulnerable than the unprotected landscape to the west. In this instance, the site also shares many similarities with the land to the west; and whilst the fields to the west are generally set lower and the site is located where the land does begin to rise, the site's main intervisibility is with that landscape. Other than its hedges and arable farmland, the site is also not highly characteristic of the NL; and I heard at the hearing that, whilst the site's landscape is in good condition, it is not of the highest quality in relation to some of the more scenic downs in the area.
17. Nevertheless, the site is within the NL, contributes to its surroundings, forms part of the transition to the more dramatic parts of the NL and does display, as set out above, some of the special qualities of the LCA 2F part of the NL. The main parties also agree that the sensitivity of the landscape character of the site, surrounding area (with respect to the most relevant LCAs) and NL is high.
18. There is no dispute that the proposed development would harm the landscape character and visual amenities of the site, surrounding area and NL; and that the harm would be localised and experienced within the immediate local area. Furthermore, during the hearing, the Council clarified its position with regards to the degree of harm to the NL, confirming that the harm to the NL and its special qualities would be minor adverse, essentially due to the scale of the site and the proposed development compared to the NL.
19. There remains disagreement between the main parties as to the significance of the effects on certain specific aspects. Nevertheless, the parties' positions on those matters are not, in my view, hugely different, with the appellant generally finding slightly less harm than the Council. This largely stems from, for example, the appellant assessing some receptor sensitivities and/or magnitude of change as less than the Council, and in several cases the ES too. I heard at the hearing that professional judgement is also an important factor with regards to assessing what is an essentially a qualitative, personal and perceptual issue.
20. With respect to on-site landscape features, it has been put to me that the resulting field sizes would be uncharacteristic. The field pattern would clearly change due to

proposed mitigation planting and the security fencing separating the development from the remaining undeveloped portions of each field. However, field sizes vary in the locality and the Council confirmed at the hearing that the field pattern in the surrounding area is irregular. The current sizes of the fields covered by the site also reflect modern agricultural practices rather than being wholly historic. In addition, the statement of common ground includes agreement on the proposed planting providing significant beneficial effects on the site's landscape features. Accordingly, the appeal proposal would not harm on-site landscape features.

21. There is agreement that the significance of the effect on the site's landscape character would be, at least, moderate adverse. Although much of the site would still be available for agricultural use, such as grazing, and the development would be time limited and reversible, the submitted evidence and the changes that the development proposed would bring about to the site's nature lead me to agree that the effect of the development on the landscape character of the site would be moderate adverse. With respect to the development's effect on the surrounding area, principally in relation to the features of LCAs 11 and 2F, the Council considers the significance of effects in years 1 and 15 (once mitigation planting has established) would also be moderate adverse. Based on the submitted evidence, what I heard at the hearing and my above findings in relation to the site's characteristics and contribution to those LCAs, I find the adverse effects on the surrounding landscape would indeed be more moderate in nature rather than moderate/minor as assessed by the appellant.
22. Turning to visual amenity, despite it extending over almost 35 hectares, views of the site are surprisingly limited. Nevertheless, short-distance public views of parts of the site are possible from various points in the vicinity, particularly from the Portway Roman Road and the long-distance Test Way route, whilst longer-distance views are also possible from a few vantage points in the surrounding area. However, most short-distance views are either not extensive, largely limited to glimpses or are filtered by existing planting; whilst in longer-distance views, the site forms a relatively minor feature and reads as a not especially remarkable part of the wider landscape. In addition, the entire site cannot be seen in one view and I observed on my visit that, due to topography, planting and the nearby ridge, it is mostly seen in views with the unprotected landscape rather than the NL. The likelihood of greater views being available in winter and that hedgerows around the site have previously been cut back more do not lead me to a different conclusion.
23. Without mitigation planting, the development would be very visible from the short section of Test Way that runs past the site, as per viewpoints (VP) 5 and 6 of the ES; and it would appear to break the skyline. However, due to the existing hedgerow, the development's set back from the corner of the site and the topography of the field and site, only a relatively small part of the appeal proposal would be visible in year one. In addition, once the existing hedgerow has grown and the proposed planting has established, the views of the development from there would be limited, as would any potential glint and glare. However, given planting would be unlikely to fully screen it in winter and the development would be an unexpected and inconsistent feature in these views, the overall residual effect on visual amenity would be between minor and moderate adverse.
24. In coming to this view, I have taken account of the sensitivity of receptors using Test Way as being at the higher end and that the development would occupy much of the extent of the views and be relatively close. In addition, whilst the

proposed planting and increased hedgerow height would restrict views from the route, the current views available from Test Way across the site are limited and neither particularly open nor long due to the hedgerow and the land in the southern field rising to a crest and falling to the west. There is also no current control requiring the existing hedgerow to remain at its current/previous height. Furthermore, the Test Way route in the vicinity of the site is largely characterised by limited views of the surrounding landscape due to high hedges.

25. With respect to the Portway Roman Road, the main view of the site is currently through a gap in the hedge. Although that gap provides expansive views across the northern section of the site (and towards the ridge beyond it) if one stops next to it, receptors on the road would likely obtain only a brief glimpse of the development as they pass by. In any event, the proposed gapping up with mitigation planting would largely screen the development from there. Once the planting has fully established, the residual impact at VP13 would therefore be minor, especially taking into account that linear planting is an identified feature of the Portway Roman Road. However, parts of the development would be visible to some extent above hedges along the road, particularly when travelling from the west due to the topography, and from the area around VP14, which includes the start/end of a public right of way. In these cases, any further planting on the site's northern boundary or allowing the hedgerow to grow higher would be unlikely to significantly limit such views or potential glint and glare. There would also likely be filtered views of the development through the hedgerow during the winter. Consequently, the overall effect on the visual amenity from the Portway Roman Road would be moderate adverse.
26. In the open views from Trinley Lodge and Trinley Lodge bungalow, a relatively large extent of the development would be visible in the northern section of the site. Due to topography and the elevated positions of the properties, further planting on the site's northern boundary would be unlikely to reduce the views of the development to any real extent. The visual change would therefore be notable. However, there is a reasonable degree of separation to the site and the expansive views available from both properties would continue to include a large extent of undeveloped countryside despite the development being visible. Accordingly, and taking into account the higher sensitivity of the receptors (the occupiers) at those properties, the residual visual effect of the development at Trinley Lodge and Trinley Lodge bungalow would be moderate adverse.
27. I observed on my site visit that parts of the appeal site are visible from various points within Mulberry Court. Whilst the development would therefore be visible from various properties there, many of which do face north, views would nevertheless be restricted to relatively limited parts of the development due to topography and screening from existing planting. With the degree of separation and the closest part of the appeal proposal positioned to the side of Mulberry Court, the development would also not be visible in short-distance views and would instead be seen as a not particularly significant element within more medium to longer-distance views of the wider undeveloped landscape. Furthermore, the proposed mitigation planting would significantly limit the visibility of the development once it has established. On this basis, and taking into account the receptors' sensitivity, the residual visual effect of the development at Mulberry Court would be less than moderate adverse.

28. The main visual effects would be largely localised and are covered above. Although the development would be visible from some other points in the wider area, only parts of it would be observable, whilst the views would be longer-distance with the visible portion(s) of the solar farm forming a relatively small part of the overall vista. In addition, existing planting would often serve to filter the views and/or restrict them to glimpses. The visual effects from other points in the surrounding area would thus not be significant and be no more than minor adverse, as assessed in the ES.
29. Drawing this all together, the proposed development would clearly harm both landscape character and visual amenity. However, as the effects would be experienced mainly within the immediate local area, the harm would be localised; and I have found that the residual harms (after accounting for the mitigating effects of additional planting) would be no more than moderate. With the development being for a period of up to 40 years, the harms, although relatively long-term, would also not be permanent.
30. With regards to the NL, I recognise the AONB unit and Natural England consider that the development proposed would result in significant harm to the protected landscape. However, the submitted evidence and the discussion at the hearing indicates that most of the valued attributes of the relevant NL character area (LCA 2F) would be unaffected by the development, with harm through the introduction of the extensive built form proposed only affecting the two valued attributes of its quiet rural character and sparsely populated landscape. In addition, the NL's most important overall landscape characteristics (its undulating open downlands and long expansive views, as described by the Council during the hearing) would be unaffected. Whilst receptors in the surrounding area, such as on the Test Way long distance route, would experience a change from the existing situation and visual amenity would be adversely affected, the NL's public right of way network would also not be directly affected. Combined with the development's scale relative to the NL, I concur with the main parties that the overall effect of the development on the NL would be minor adverse.
31. Nevertheless, the site is currently largely devoid of development whereas the appeal proposal would introduce a large amount of modern energy infrastructure, along with security fencing and CCTV, with planting provided mainly as mitigation rather than stemming from an obviously landscape-led approach. Despite the retained and proposed soft landscaping, the development would therefore read as an incongruous, significant industrial-esque feature in the largely undeveloped, relatively tranquil, rural surroundings. Given the site's edge position and that the solar farm would read as a large amount of development intruding into the protected landscape and changing the character of the site and locality, the appeal proposal would also adversely affect the integrity of the NL. However, the effect would be limited given the site's nature and size compared to the NL and that views of the development would be limited, particularly so following the establishment of mitigation planting.
32. For the above reasons, I conclude that the proposed development would, despite its temporary nature, harm the landscape and visual amenity of the surrounding area and NL. However, for the reasons above, the harm would, overall, be localised and at most, after accounting for mitigation, moderate. Nevertheless, the appeal proposal does not accord with Policy EM1 of the Basingstoke and Deane Local Plan 2011-2029 (LP) and Policy P5 of the St Mary Bourne Parish

Neighbourhood Plan 2016-2029. Amongst other aspects, these set out that development proposals in the protected landscape will be determined in accordance with national planning policy and criteria set out in the NWDMP but also expect development to not be detrimental to landscape character or visual amenity; and support development that responds positively to the local environment, including landscape features. The proposal would also be contrary to the NWDMP, including in relation to its various policies which, amongst other aspects, expect development to adopt a landscape-led approach, not have an adverse impact, and to further the purposes of the NL by conserving and enhancing its character and valued qualities.

Exceptional circumstances

33. Paragraph 190 of the Framework sets out that permission for major development within National Landscapes should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. It also details that the consideration of such applications should include an assessment of a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
34. There is no dispute that the appeal proposal would constitute major development in the NL. The main parties also agree that considerations a) and b) of paragraph 190 are met. In summary, and as I heard at the hearing, this is due to, amongst other aspects, climate change resulting in the urgent need to reduce carbon emissions via the provision of renewable and low carbon energy; the binding legal target to achieve net-zero carbon emissions by 2050; local actions being needed to achieve both local and national targets, and that this requires both significant further rooftop solar installations and numerous new solar farms both locally and nationally. By increasing domestic generation and contributing towards energy security, the development would also help to serve increasing demand for electricity and assist in stabilising energy prices. In addition, the economic impact of permitting the development would be significant, including from construction creating around 100 jobs at its peak and representing an investment of approximately £15.6 million. The development would also contribute to the local economy through business rates, some operational employment and via farm diversification (with the income from the development supporting the farm).
35. There is undoubtedly, therefore, a clear and compelling national need for the development; and refusing permission would mean the local area would not realise the significant economic benefits. Due to various constraints, including in relation to limited grid capacity and the location of the available point of connection (PoC), the evidence indicates that there is no scope to develop the proposal outside the NL. Even if there was scope to do so, the additional costs associated with, for example, extensive off-site cable routing and securing agreement with landowners for the cable route to the PoC would likely make the development unviable and undeliverable. The ability to meet the need in some other way is also limited given the extent of the need to increase the supply of electricity whilst also decarbonising the electricity network, reducing dependence on fossil fuels and supporting the UK's transition to achieving a low carbon economy.

36. With respect to consideration c), whilst the proposal would be visible to some extent in some public views, it would not detrimentally affect recreational opportunities or the environment. Although the development would harm the landscape and visual amenity of the surrounding area and NL, the overall harm, after accounting for the moderating effect of mitigation, would be localised and, at most, moderate, whilst the effect on the NL would be minor adverse.
37. Bringing this all together, I find that exceptional circumstances exist in this case and the proposed development is clearly in the public interest. Despite the appeal proposal not conserving and enhancing the area's natural beauty and my duty to seek to further those statutory purposes, this leads me to conclude that permission should therefore not be withheld in relation to this main issue. The development harming the NL, and the harm being relatively long-term, neither changes this nor inevitably means the exception criteria are not met.

Heritage assets

38. There are various heritage assets near and on the site. This includes the scheduled monument known as Devil's Ditch within Pepper Hill Firs and its unscheduled earthwork sections; the scheduled monument known as Roman House 1/2 mile (810m) E of Finkley Farm; the grade II listed Lower Wyke Farmhouse; and an undated non-designated trackway.
39. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires special regard to be had to the desirability of preserving the (listed) building or its setting or any features of special architectural or historic interest which it possesses. Listed under section 1 of the Ancient Monuments and Archaeological Areas Act 1979, scheduled monuments are of national importance. The Framework sets out that great weight should be given to the conservation of such assets and the more important the asset, the greater the weight should be. Scheduled monuments are identified as assets of the highest significance.
40. The significance of Devil's Ditch principally derives from the archaeological interest in its physical form, along with its historic interest as an early medieval earthwork. Its setting, including the area in its immediate vicinity and its non-designated archaeological features (one of which extends through the site), also contributes to its significance. The significance of Roman House principally stems from the archaeological interest of its below-ground remains of a flint-built building and the historic interest of its physical remains. Its setting, including the Portway Roman Road and the south facing slope on which it is located, also contributes to its significance. The significance of the late 18th-century Lower Wyke Farmhouse is mainly derived from its architectural and historic interests principally embodied in its built fabric. Its setting also contributes to its significance and includes the historically associated farm buildings and clearly intervisible agricultural land, its domestic garden to the south, and the adjacent highway faced by the building's secondary façade. The significance of the undated trackway, a non-designated heritage asset, is essentially derived from its modest archaeological value.
41. Although the proposed development would be within the settings of the scheduled monuments and listed building, the main parties agree that the development would only harm the significance of Devil's Ditch through affecting its setting; and the harm to that asset would, as also confirmed by Historic England, be at the lower

end of the scale. Based on the submitted evidence, what I heard at the hearing and from my site visit observations, I have no reason to disagree.

42. Although the development would result in limited harm to the setting of Devil's Ditch, this still equates to, in the words of the Framework, less than substantial harm to the significance of the designated heritage asset. In such circumstances, it is necessary to weigh the harm against the public benefits of the proposal.
43. In this instance, the development proposed would generate up to 29 megawatts of renewable energy, equivalent to the annual energy use of over 7000 homes and estimated to save over 6,400 tonnes of carbon emissions per year. Consistent with the Framework's provisions on planning for climate change, it would therefore support the country and borough meeting its commitments on renewable energy and carbon emissions, and the need to achieve net zero. As set out above, it would also assist in stabilising energy prices and help to serve the increasing demand for electricity. In addition, the proposed planting and cultivation of species-rich grassland would result in a substantial net gain in biodiversity. Furthermore, as set out above, the development would lead to various local economic benefits.
44. The development would therefore provide extensive environmental, social and economic benefits which, by their nature and extent, equate to substantial public benefits. Accordingly, despite the considerable importance and very great weight that I afford to the conservation of designated heritage assets, the proposal's public benefits provide clear and convincing justification and outweigh the less than substantial harm to the significance of the scheduled monument.
45. Whilst much of the on-site archaeological resource would remain in situ, works such as piling and excavation could result in some discrete but direct impacts on the undated trackway. Although the proposed archaeological condition would ensure any archaeological value was recorded, it was confirmed at the hearing that construction would harm the asset's significance, albeit at the lower end of the spectrum. Nevertheless, I find that the effect on the non-designated asset is, on a balanced judgement, also justified in this instance given the scheme's benefits.
46. There are other heritage assets in the surrounding area, including the Registered Park and Garden Hurstbourne Park; Hurstbourne Priors conservation area; the Middle Wyke Farm listed building; and non-designated buildings including Keepers Cottage and at the Lower Wyke Farmhouse complex. However, there is no allegation that the proposed development would harm the significance of any of these assets, including with respect to their settings. Based on the available evidence, the lack of intervisibility and the degree of separation between the site and these assets, I have no reason to conclude otherwise. I therefore find that the development would preserve the significance of these other heritage assets, including with respect to their settings.

Other matters

Residents' living conditions

47. Occupiers of Trinley Lodge and Trinley Lodge bungalow would be able to see a relatively large extent of the development; and it struck me on my site visit that additional planting would do little to change this due to the properties' elevated positions. However, the proposed panels and associated infrastructure would not be particularly high and there is a relatively significant degree of separation

between the properties and the nearest visible parts of the site. The development would thus not appear overbearing. Whilst occupiers' views would, as set out above, clearly change, there is no right to a private view. Nevertheless, I observed on my visit that the views, whilst changing significantly, would not be entirely dominated by the development, with reasonably extensive areas of undeveloped countryside remaining visible. Consequently, the altered outlook and views due to the development would not unacceptably harm the living conditions of occupiers of Trinley Lodge and Trinley Lodge bungalow. In coming to this view, I have taken account of the references and expectations in the LP and the Framework with regards to quality of life, living conditions, respecting the amenity of neighbouring properties and ensuring a high standard of amenity for existing users.

48. The submitted evidence indicates that reflections from the panels could be experienced at the two properties at Trinley Estate, and it seems to me that vegetation is unlikely to provide much screening from any glint and glare. However, the reflections are predicted to be less than 60 minutes per day for less than three months a year. The limited duration of such reflections would also therefore not unacceptably harm occupiers' living conditions. The assessor not visiting the site and the lack of figures in the Solar Photovoltaic Glint and Glare Study showing results from the desk-based analysis covering these properties do not lead me to a different conclusion.
49. I observed on my visit that there are views from Mulberry Court (MC) across the appeal site. Many properties there are also orientated to take advantage of the landscape to the north, including from windows and outdoor spaces. However, whilst the development would change residents' views to some extent, there is no right to a private view. Views across the site from MC are also generally not extensive, often being reduced and filtered by existing planting for example. The closest part of the development (in the southern field) would also be positioned to the side of MC. Combined with the additional planting proposed, the degree of separation and the limited height of the panels and associated infrastructure, the development would therefore not unacceptably harm the living conditions of MC residents, including with respect to outlook. In coming to this view, I have taken the sloping nature of MC into account. Whilst Mulberry Court has expanded since the Glint and Glare Study was carried out, the report also identifies that reflections to MC are not geometrically possible.

Other matters

50. Numerous further matters have been raised by various parties, and I have taken them all into account. This includes: a wider search area should have been used to identify alternative sites; brownfield sites rather than farmland should be used for solar farms; loss of good quality arable land; food security issues; light and noise pollution; impact on wildlife; highway safety concerns, along with disruption to traffic and damage to roads; the potential effect on local businesses, including the nearby shoot at Trinley Estate, which is a long-standing rural diversification activity that contributes to the local economy; erosion of the gap between the settlements of Andover and St Mary Bourne; glint and glare to other receptors, including drivers, pilots and walkers; precedent; potential for future applications to extend the development and/or for further similar schemes in the area; whether local electricity prices would reduce and the provision of any community related funds; potential health effects on local residents, particularly due to the distance between the development and existing properties; noise pollution; the site being classified

as brownfield in the future; inaccuracies in some of the submitted documents; effect on property values; the extent of community consultation; whether panels will need to be replaced during the lifespan of the scheme and the effects of this on traffic and effective use of resources; the need for a greater set-back of panels/buffers from the site's boundaries and the need for more mitigation planting; and the potential need for additional pylons.

51. However, whilst I take these representations seriously and recognise the strength of people's concerns, the available evidence does not demonstrate that the proposal would result in unacceptable effects or is unacceptable with regard to any of those matters which are related to planning. Consequently, they do not lead me to a different overall conclusion that the appeal should be allowed. Some of the issues raised, such as regarding restoration of the land, construction and highway safety, light pollution and wildlife can also be covered by planning conditions.

Planning Balance

52. Inconsistent with the Framework's provisions which seek to conserve and enhance the natural environment and the similar NWDMPP principles and priorities, the proposed development would harm the landscape and visual amenity of the area and NL. The conflict I have identified with development plan policies in relation to this matter therefore leads me to conclude that the appeal proposal conflicts with the development plan as a whole. The proposal would also harm heritage assets.
53. The Framework sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes, which have the highest status of protection in relation to these issues, and the conservation of designated heritage assets. The harm to both, and to the landscape and visual amenity of the area in general, therefore attract very great weight.
54. However, LP Policy EM8 sets out that commercial renewable energy development will be permitted unless there are adverse impacts which are not outweighed by the benefits. In addition, Framework paragraph 190 does not direct that permission for major development within NLs cannot be approved even if there would be harm to the protected landscape.
55. In this case, I have found that the harm to the landscape and visual amenity of the surrounding area would be localised and (at most) moderate. With the effect of the development on the NL being minor adverse, the appeal proposal would also be inconsistent with the promotion of the statutory purposes of conserving and enhancing the NL's natural beauty. On the other hand, as detailed above, the development would result in extensive environmental, social and economic benefits; and I have found that exceptional circumstances exist in this case, the proposed development is in the public interest, and the public benefits are sufficient to outweigh the harm to heritage assets. With a grid connection offer in place and the scheme prioritised as a Gate 1 Phase 1 connection, the proposed development is deliverable and thus its associated benefits could be realised relatively quickly. With current grid capacity constraints in the area, there are also limited opportunities for schemes of a similar size to be connected elsewhere in the borough. Accordingly, the adverse impacts, the conflict with relevant development plan policies and the inconsistency with the statutory purposes of the NL are outweighed by the scheme's substantial benefits.

Conditions

56. I have had regard to the various suggested planning conditions and considered them against the tests in the Framework and the advice in the Planning Practice Guidance. I have made such amendments as necessary to comply with those documents and for clarity and consistency. The pre-commencement conditions I have included are all matters which are fundamental to be resolved prior to development commencing.
57. In addition to the time limit condition, I have imposed condition 2 in the interests of certainty. The CCTV drawing listed in that condition also excludes the previously proposed loudspeakers. Condition 3 is necessary to ensure the permission is time limited and the development is subsequently decommissioned and the site restored. Conditions 4, 5 and 6 are necessary in the interests of highway safety.
58. Conditions 7 and 8 are necessary in the interests of protected species and biodiversity. Condition 9 is necessary with regards to archaeological interest on the site. Condition 10 is necessary with regards to ensuring suitable drainage on the site. Condition 11 is necessary to ensure that the site remains functional for future agricultural use and to secure an improvement in soil quality. Conditions 12, 13 and 17 are necessary with regards to character and appearance. Conditions 14 and 16 are necessary for the same reason and with regards to wildlife.
59. Condition 15 is necessary with respect to wildlife, archaeology and, in relation to the likely significant environmental effects on the environment with regards to EIA, landscape and visual amenity. Condition 18 is necessary with respect to the living conditions of existing residents. However, I have not imposed the suggested highway survey condition because I have little evidence that it would be enforceable or necessary to make the development acceptable.

Conclusion

60. Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance, material considerations outweigh the harm that would arise, the conflict with development plan policies and the great weight afforded to conserving and enhancing landscape and scenic beauty of the NL and the conservation of designated heritage assets. Consequently, the development should be permitted notwithstanding the conflict with the development plan as a whole.
61. For the above reasons, the appeal is therefore allowed.

T Gethin

INSPECTOR

Appearances

The appellant

Mark Westmoreland Smith, Kings Counsel

Anthony Heslehurst, Planning consultant

Paul Beswick, Landscape consultant

Gail Stoten, Heritage consultant

Si Gillett, Energy need consultant

The Council

Ms Jemma Cox, Principal planning officer

Ms Ka Man Yip, Landscape Officer

Documents submitted during the hearing

Council's closing statement

Appellant's closing summary

SCHEDULE OF CONDITIONS

- 1) The development hereby permitted shall begin not later than three years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans:
 - Site Location Plan (Drawing No 1663-0200-05, Issue 10)
 - Solar Park Layout (Drawing No 1663-0201-01, Issue 18)
 - Landscape Masterplan (Drawing No 7.8, Rev B)
 - Mounting System (Drawing No 1663-0206-00, Issue 03)
 - Transformer Station Detail (Drawing No 1663-0207-00, Issue 02)
 - Aux Transformer Station Detail (Drawing No 1663-0207-02, Issue 01)
 - Spares Container Detail (Drawing No 1663-0207-40, Issue 01)
 - Welfare Container Detail (Drawing No 1663-0207-41, Issue 02)
 - Private Switchgear Detail (Drawing No 1663-0208-50, Issue 02)
 - DNO Switchgear Detail (Drawing No 1663-0208-71, Issue 01)
 - Access Road Section (Drawing No 1663-0208-10, Issue 02)
 - Fence Detail (Drawing No 1663-0205-01, Issue 01)
 - CCTV Detail (Drawing No 1663-0204-00, Issue 03)
 - Site Sections (Drawing No 201)
- 3) The permission hereby granted shall be limited to a period of 40 years from the date when electricity is first exported from the solar farm to the electricity network (the First Export Date). Written confirmation of the First Export Date shall be given to local planning authority within 28 days of the First Export Date. Within 6 months of the expiry of this permission or the development ceasing to operate for a continuous period of 12 months (whichever is sooner), the development and associated infrastructure shall be dismantled and removed from the site and the land restored in accordance with a decommissioning and restoration scheme that shall first have been submitted to and approved in writing by the local planning authority.
- 4) No development shall commence until details of the works to the public highway, including localised widening required to accommodate construction and operational traffic, have been submitted to and approved in writing by the local planning authority. No development shall commence until arrangements for the implementation of the approved highway works have been secured with the local highway authority. The approved works shall be carried out in full prior to the commencement of development.
- 5) Construction of the development shall not be commenced until visibility splays as shown on Figure 2 1098-004 of the Construction Traffic Management Plan (December 2022) have been provided at the site access junction. Within the visibility splays, any obstruction between 1m and 3m in height above the level of the adjacent carriageway shall be cleared. The visibility splay shall be kept clear at all times thereafter.
- 6) No development shall commence until a Construction Management Plan (CMP) has been submitted to and approved in writing by the local planning authority. The CMP shall be informed by the approved Construction Management Plan

(December 2022) and Transport Technical Note prepared by Key Transport Consultants (November 2023) and shall include details of:

- construction vehicle routing;
- parking of site operatives and visitors;
- loading, unloading and storage of plant and materials;
- wheel washing and measures to prevent mud and debris on the highway;
- measures to control dust, noise and vibration;
- a scheme for recycling/disposal of construction waste;
- temporary traffic management measures and signage, including at the junction of Walworth Road and Middle Wick; and
- restrictions on construction vehicle size, including a maximum vehicle length of 16.5 metres.

The development shall thereafter be carried out in full accordance with the approved CMP. The construction compounds, parking and turning areas shall be removed and the land restored to its former condition following completion of construction.

- 7) No development shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority that covers all aspects relating to the protection and mitigation of key habitats and species both pre and during construction that are listed within Paragraph 5.3 of the Ecological Appraisal by The Environmental Dimension Partnership dated 5/2023. The development shall thereafter be carried out in accordance with the approved CEMP.
- 8) Notwithstanding the submitted information, no development shall commence until a Biodiversity Mitigation and Enhancement Plan (BMEP) has been submitted to and approved in writing by the Local Planning Authority. The submitted details shall be based upon the principles laid out in the Outline Biodiversity Mitigation and Enhancement Plan and Biodiversity Metric produced by The Environmental Dimension Partnership Ltd dated June 2024 and to include management and maintenance details. No development or other operations shall take place other than in complete accordance with the approved details. If a habitat or other landscape feature is removed or damaged in contravention of the approved plan, a scheme of remedial action, with a timetable for implementation, shall be submitted to and approved in writing by the Local Planning Authority within 28 days of the incident. The scheme of remedial action must be approved by the Local Planning Authority before practical completion of the development and implemented in accordance with the approved timetable.
- 9) No development shall commence until the implementation of a programme of archaeological mitigation has been secured in accordance with a written specification that has been submitted to and approved in writing by the Planning Authority. The development should be carried out in accordance with the approved details.
- 10) No development shall commence until a drainage strategy has been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include the design and location of the proposed swales. The approved drainage strategy shall then be implemented prior to the first export date of

electricity from the development and maintained in accordance with the approved details for the lifetime of the development.

- 11) No development shall commence until a soil management plan, which includes measures to improve soil quality and ensure that there will be no material loss of soil quality within the operational lifetime of the site, and provides details of any movement of soils within the site, has been submitted to and approved in writing by the Local Planning Authority. The soil management plan shall be implemented as approved.
- 12) Protective measures, including fencing, ground protection, supervision, working procedures, and special engineering solutions shall be carried out in accordance with the Arboricultural Impact Assessment, method statements and Tree Protection Plan dated November 2022 as submitted by Hillside Trees Ltd. Arboricultural Consultancy. Tree protection fencing and ground protection shall be erected prior to any site activity starting and maintained throughout the development. The development shall be carried out in complete accordance with the approved Method Statement in the Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan (dated November 2022, Rev A).
- 13) Notwithstanding the approved plans, prior to the erection on site, details of the proposed materials and finishes, including colour of all solar panels, frames, ancillary buildings, equipment, and enclosures, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and thereafter be maintained as such for the lifetime of the proposed development.
- 14) Notwithstanding the details submitted and approved, prior to the installation of any fencing, a plan indicating the positions, design (including with respect to mammal gaps), materials and type of fences to be erected shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be erected prior to the first export date of electricity from the development.
- 15) Notwithstanding the details submitted, within six months from the commencement of development, full details of both hard and soft landscape proposals, including a landscape management plan to address all existing and new landscape features and how they shall be managed, shall be submitted to the Local Planning Authority for its approval in writing.
Hard landscape details shall include, as appropriate, proposed finished levels or contours, means of enclosure, car parking layouts, hard surfacing materials and minor artefacts and structure (eg signs, lighting, external services, etc). Soft landscape details shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), schedules of plants (including replacement trees where appropriate), noting species, planting sizes and proposed numbers/densities where appropriate, as well as any works to enhance wildlife habitats where appropriate. In addition, the soft landscape details shall include implementation timetables and maintenance programmes detailing all operations to be carried out to allow successful establishment of soft landscaping.
All hard and soft landscape works shall be carried out in accordance with the approved details prior to the first export of electricity from the development or in accordance with the timetable agreed with the Local Planning Authority. Any

trees or plants which, within a period of five years after planting, are removed, die or become seriously damaged or defective, shall be replaced in the next planting season with others of species, size and number as originally approved, to be agreed in writing by the Local Planning Authority.

- 16) Prior to the installation of any external lighting on the site, full details including height, design, location and intensity shall be submitted to and approved in writing by the Local Planning Authority. The lighting installation shall then be carried out in accordance with the approved details.
- 17) All containers on site shall be sited at ground level and no containers shall be stacked.
- 18) No external works relating to the construction of the development hereby approved, including site preparation, demolition, deliveries of materials or plant, or removal of spoil, shall take place outside the hours of 07:30 to 18:00 Monday to Friday and 08:00 to 13:00 on Saturdays, with no such works taking place on Sundays or recognised public holidays. This shall not preclude access to the site or the presence of personnel within the site compound outside these hours, provided that no construction works or associated operations are undertaken.

END OF SCHEDULE