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■ Your ref: PL/2026/03394

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09 September 2026

By Email Only

Dear Kate Clements

PLANNING APPLICATION FOR THE PROPOSED CONSTRUCTION AND OPERATION OF A GROUND MOUNTED SOLAR PV ARRAY TOGETHER WITH ALL ASSOCIATED WORKS, ANCILLARY INFRASTRUCTURE AND EQUIPMENT, LANDSCAPING, BIODIVERSITY IMPROVEMENTS AND ACCESS – LAND AT STOURHEAD, NEAR MERE, WILTSHIRE, BA12 6QD

I write on behalf of the Applicant (National Trust for Places of Historic Interest) in relation to the above planning application and to accompany the submission of revised documentation prepared in response to consultation comments received during the determination of the application. The enclosed information has been prepared to address the matters raised by consultees and to assist the Council in progressing the application towards determination.

Following the consultation period, which has now concluded, a number of consultees have confirmed that they have no objection to the proposed development. In particular, no objections have been raised by:

- Principal Ecologist;
- Landscape Officer;
- Lead Local Flood Authority;
- Rights of Way Officer;
- Conservation Officer;
- Historic England;
- Public Protection Officer;
- Military of Defence;
- Climate Team; and
- The Gardens Trust.

Some of these consultees have recommended planning conditions, should planning permission be granted. The Applicant has reviewed the suggested conditions and confirms that they are acceptable in principle, subject to the Council's final wording and any necessary discussion during the determination process.

Notwithstanding the above, the County Archaeologist, Arboricultural Officer, Cranborne Chase National Landscape Officer, Local Highway Authority and Stourton with Gasper Parish Council have requested

further information or raised questions requiring clarification. These have been addressed in full below, with revised supporting documentation submitted alongside this correspondence, where appropriate.

County Archaeologist

While the County Archaeologist has confirmed that no heritage assets have been recorded within the footprint of the proposed development. As a result of finds relating to Mesolithic and Neolithic activity recorded during the development of the car park extension to the north of the site in 2013 and the area immediately around Stourhead being populated with the remains of a later prehistoric landscape, there is the potential for as-yet unrecorded sub-surface features from this period surviving within the site boundaries.

Therefore, a geophysical survey has been undertaken and is submitted alongside this correspondence. The findings confirm that no archaeological anomalies of significance have been identified. Accordingly, it is considered that the archaeological concerns have been satisfactorily addressed.

Arboricultural Officer

Following a review by an Arboricultural consultant (Bosky Trees) the red line boundary has been amended to relocate the grid connection route that was proposed to the east of the caravan parking western boundary hedge further west, to the west of that same hedge. The cable route will now pass through the agricultural field to the north of the solar array site before being installed beneath the existing hedgerows using horizontal directional drilling, after which it will continue along its previously proposed route to the SSE compound.

This amendment has been accompanied by an Arboricultural Method Statement, a Tree Protection Plan and revised Ecology documents. The Arboricultural Method Statement provides details of how planned operations near trees will be carried out. However, Arboricultural supervision will be sought if any unforeseen construction activity is to take place within or adjacent to the root protection area (RPA) of any of the retained trees at the site. As shown by the Tree Protection Plan, to facilitate the construction of the proposal without impacting upon any identified tree, tree protection fencing will only be required around T15 (a Sycamore of approximately 15m in height).

Cranborne Chase National Landscape Officer

The Applicant has engaged constructively with the National Landscape Officer throughout the pre-application process, including the stakeholder site visit, and the proposal has evolved in response to that engagement and to the technical assessments supporting the application.

Whilst the consultation response raises a number of observations, particularly in relation to opportunities for landscape mitigation and implementation. It is respectfully considered that several of the concerns raised either arise from differing interpretations of the submitted application documents, relate to matters that have already been comprehensively assessed within the supporting technical evidence or concern operational matters that do not materially affect the planning merits of the proposal. Where further clarification is considered beneficial to assist the Local Planning Authority in its assessment, this is provided below.

Overall, the Applicant maintains that the proposal has been carefully designed through an iterative, landscape-led process to conserve the special qualities of the National Landscape whilst delivering an appropriate renewable energy development that will provide significant environmental, operational and public benefits for the Stourhead Estate.

Exceptional Circumstances

Prior to considering the comments provided by the Cranborne Chase National Landscape Officer, it is important to note that the National Planning Policy Framework (NPPF) was revised on 17 August 2026. As the application remains undetermined, it falls to be considered against the policies of the August 2026 NPPF. The revised Framework introduces a restructured policy framework for Protected Landscapes through Policy N4, which supersedes the previous approach contained within paragraphs 189 and 190 of the December 2024 NPPF. The Government has confirmed that the revised Policy N4 retains the requirement for major development within Protected Landscapes to be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.

The Application Site lies within the Cranborne Chase and West Wiltshire Downs National Landscape, as does the entirety of the Stourhead Estate. The proposal must therefore be considered against the enhanced protection afforded to nationally important landscapes and heritage assets by the NPPF. It follows that the identified operational need cannot be met outside the designation: the Stourhead Estate holds no land beyond it, and siting the development elsewhere is not an option available to the Applicant.

Policy N4 of the NPPF states that development proposals within Protected Landscapes including National Landscapes *“should be limited in scale and extent and sensitively located and designed to avoid harm to the statutory purposes and special qualities of the Protected Landscape.”* Policy N4 further details that planning permission should be refused for major development within these designated landscapes other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Footnote 59 makes clear that whether a proposal constitutes “major development” is a matter for the decision-maker, having regard to its nature, scale and setting, together with whether it could have a significant adverse impact upon the purposes for which the area has been designated.

The Applicant maintains that the Proposed Development does not constitute major development for the purposes of Policy N4. Whilst the red line application boundary extends to approximately 1.47 hectares, this includes existing access tracks, ecological enhancement areas, landscaping and the underground cable route. The operational solar array itself occupies only approximately 0.8 hectares. When considered against the decision-making criteria contained within Footnote 59, the proposal is small in scale, temporary and fully reversible in nature, occupies a limited physical footprint, increases the agricultural use of the land through sheep grazing, and has been carefully designed to avoid significant adverse effects on the purposes of the National Landscape designation through extensive mitigation and sensitive siting.

Nevertheless, recognising the sensitivity of the Site and in response to consultation comments received, the Applicant has considered the proposal against the exceptional circumstances test contained within Policy N4. Therefore, consideration has been made to the following assessment presented within Policy N4, paragraph 2:

- a) *“The need for the development, including in terms of any national considerations such as maintaining a sufficient supply of minerals, and the impact of permitting it, or refusing it, upon the local economy;*
- b) *The cost of, and scope for, developing outside the Protected Landscape, or meeting the need for the development 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.”*

Firstly, the proposal is not speculative or export-led renewable energy development. It is a direct-wire solar installation specifically designed to meet the existing and future operational electricity demand of the Stourhead Estate. Stourhead is one of the Trust’s most visited properties and has a substantial, ongoing electricity demand arising from visitor facilities and estate operations. The proposed solar array will supply renewable electricity directly to these uses, reducing reliance on imported electricity and supporting the National Trust’s commitment to achieve net-zero carbon emissions by 2030. In doing so, it will improve the operational resilience of the Stourhead Estate, reduce exposure to wholesale energy

market volatility and generate financial savings that will be reinvested into conservation activities across the wider Estate.

Furthermore, as detailed within section 4.2 of the submitted Design and Access Statement, there is no reasonably available alternative capable of delivering the identified operational need. As demonstrated within the submitted Alternative Site Assessment, roof-mounted solar generation cannot provide the required capacity, and a direct-wire scheme must be in close proximity to the Estate's existing electricity demand to remain technically and economically viable. The assessment considered alternative locations within the National Trust Estate, taking account of landscape sensitivity, heritage constraints, agricultural land quality, existing vegetation and engineering requirements. The selected Site was identified as the optimum location because it minimises visual effects, avoids the most sensitive heritage receptors and limits the extent of new infrastructure, including underground cabling.

Additionally, the proposal delivers substantial environmental benefits beyond the site itself. The array will displace imported grid electricity across the Estate's visitor facilities and operations, delivering a direct and measurable reduction in operational carbon emissions and contributing to the National Trust's commitment to net-zero by 2030. Nature recovery has been embedded as a fundamental design objective rather than a mitigation exercise. The scheme incorporates habitat creation, species-rich grassland enhancement, native hedgerow planting and biodiversity net gain whilst promoting the agricultural use of the land through sheep grazing. These enhancements ensure that the Site will provide greater ecological value than the existing baseline throughout its operational lifetime and beyond.

Taken collectively, these factors comprise a unique combination of circumstances that distinguish this proposal from a conventional solar farm. The scheme is intrinsically linked to the continued operation and long-term sustainability of a nationally important heritage estate, delivers direct operational and environmental benefits that cannot reasonably be achieved elsewhere, and has been demonstrably designed to minimise effects on the designated landscape.

The Applicant recognises the statutory purpose of conserving and enhancing the natural beauty of the Cranborne Chase National Landscape. That purpose is not served by inaction on climate change. The chalk downland, ancient woodland, veteran trees, hedgerows and chalk streams that constitute the special qualities of this designation are themselves vulnerable to a changing climate, and the long-term conservation of the National Landscape depends on the transition to low carbon energy being delivered in practice as well as in policy. The Proposed Development contributes to that transition, in a form that is sensitive, temporary and fully reversible, and in a location selected specifically to minimise effects on the designated landscape.

Accordingly, even if the Local Planning Authority were to conclude that the proposal constitutes major development for the purposes of Policy N4 of the NPPF, exceptional circumstances are clearly demonstrated. The significant public benefits arising from decarbonisation, energy resilience, heritage conservation, biodiversity enhancement, nature recovery and the sustainable operation of the Stourhead Estate clearly outweigh the limited and carefully mitigated effects of the development. The proposal therefore satisfies the requirements of Policy N4 of the NPPF and should be supported.

Landscape Character Area

The National Landscape Officer considers the Site to lie wholly within the Kilminster Greensand Terrace Landscape Character Area. The submitted Landscape and Visual Impact Assessment (SPP/3417/doc.1 Rev D), however, continues to identify the site as being located on the transitional boundary between the Kilminster Greensand Terrace and Penselwood Longleat Landscape Character Areas. Given the scale and resolution of the published mapping, within the Cranborne Chase and West Wiltshire Downs Integrated Landscape Character Assessment (2024), the precise location of this boundary is not definitive. Accordingly, as the Site does contain some features representative of both Landscape Character Areas the Landscape and Visual Impact Assessment (LVIA) adopts a robust and precautionary

approach by considering the characteristics, sensitivities and management objectives of both landscape character areas.

Consequently, irrespective of the precise location of the mapped boundary, the assessment comprehensively evaluates the proposal against the relevant landscape context and concludes that the Proposed Development can be accommodated without giving rise to unacceptable effects on landscape character or the special qualities of the National Landscape.

The consultation response also makes a number of references to the recently planted trees to the south and west of the Site, which are under the management of the neighbouring landowner. Having regard to the extent and location of this existing planting, additional hedgerow planting along the western and southern boundaries of the solar array has not previously been considered necessary as part of the mitigation strategy for the Proposed Development.

Notwithstanding this, and following further discussions with the Local Planning Authority, the Applicant now proposes additional native boundary hedge planting to the west of the solar array area. This will provide further mitigation, reducing views of the arrays from footpath STGA7 and assist in integrating the Proposed Development into its surroundings. Additional hedge planting to the south of the solar array is not considered necessary at this time, given the presence of established and mature hedgerows in close proximity to the southern boundary, which already provide a substantial degree of screening and landscape integration.

Landscape and Visual Appraisal Methodology

The applicant acknowledges that the previous edition of the LVIA referred to its report as a Landscape Visual Appraisal. This has since been amended with the revised LVIA considering the potential impact of the proposal, if any, on the surrounding area both on views and the landscape and if necessary, recommend appropriate mitigation. Its purpose is to inform and enhance the design of the proposed development and assist the Local Authority in its consideration of the proposal. It should be noted that the report is a Landscape and Visual Impact Assessment (as described in the Landscape Institute and the Institute of Environmental Management and Assessment's 'Guidelines for Landscape and Visual Impact Assessment (GLVA)', third edition released April 2013.)

The National Landscape Officer also suggests that the assessment is not compliant with GLVIA3 because the site visits and photography were undertaken during October 2025 when vegetation retained some leaf cover. Whilst GLVIA3 recommends that seasonal variation should be considered where relevant, it does not prescribe that all field surveys or photography must be undertaken during winter months or under "worst case" conditions. Professional judgement remains central to landscape assessment. The submitted appraisal is supported by a Zone of Theoretical Visibility, extensive field survey work and professional site assessment, which together provide a robust understanding of the site's visibility throughout the year. Furthermore, the principal containment of the site is provided not only by deciduous hedgerows but also by mature woodland blocks, landform and the enclosed nature of the surrounding landscape, all of which remain effective landscape features irrespective of seasonal leaf cover.

For confirmation as detailed within the supporting documentation, the development is proposed to have an operational lifetime of 40 years, after which all the associated infrastructure will be removed from the land, of which will be managed by the landowner as controlled by planning conditions.

Finally, reference is made to the absence of a detailed landscape mitigation plan. This is not accepted. The application is accompanied by a Landscape Mitigation Plan which details the proposed native hedgerow planting, with the inclusion of proposed species and numbers and identifies new areas of habitat gain with modified grassland below the solar arrays.

Best and Most Versatile Land

The National Landscape Officer correctly notes that the site comprises Grade 2 Best and Most Versatile (BMV) agricultural land. However, the presence of BMV land does not preclude development. The Proposed Development is small in scale, with the operational solar array occupying approximately 0.8 hectares, and is entirely reversible. Furthermore, whilst the Site is identified as agricultural land, it is not currently subject to active agricultural cultivation and forms part of National Trust's wider visitor estate offer. Accordingly, the proposal will facilitate the reintroduction of agricultural use through sheep grazing to maintain the grass sward.

This approach is consistent with the recent Burcot Farm appeal (APP/Q3115/W/24/3350890) where the Planning Inspector allowed a solar development on entirely BMV land, concluding that continued sheep grazing, limited soil disturbance and the reversible nature of the development meant there would be no permanent loss of agricultural land. The circumstances of the Proposed Development are directly comparable and demonstrate that the temporary use of BMV land for solar development, whilst improving agricultural productivity, is consistent with national planning policy.

Additional Comments

The consultation response also raised multiple concerns of which relate to operational matters rather than matters affecting the principle of development. These include the potential future shading from woodland planting. This is fundamentally an operational design consideration rather than a planning matter. The National Trust, as landowner and future operator, is fully aware of the surrounding woodland planting programme and has designed the scheme accordingly to ensure it meets its requirements for the lifetime of the development.

The National Landscape Officer refers to the possible presence of an historic tunnel beneath the Site. To address this point directly, the Applicant has commissioned a geophysical survey of the application site, which is submitted alongside this correspondence. The survey identified no anomalies indicative of a subsurface void or tunnel within the surveyed area. This is consistent with the submitted Heritage Impact Assessment, prepared by suitably qualified archaeological consultants, which identified no documentary or archaeological evidence for such a feature. Concerns regarding potential vibration effects arising from the installation of the mounting posts are therefore not supported by the evidence base, which now includes direct geophysical investigation of the Site. This matter does not represent a reason to withhold planning permission.

Finally, the National Landscape Officer recommends the use of instant hedging and additional boundary reinforcement. Having carefully considered these comments, together with those provided by other statutory consultees and the Case Officer, the Applicant has amended the proposed landscape mitigation. The revised mitigation now includes a native hedgerow along the western boundary of the Site, comprising species consistent with the proposed hedgerow planting to the north of the Site.

The proposed western boundary hedgerow, together with the existing young woodland planting outside the applicant's ownership, will provide additional screening and enclosure to the western edge of the Site.

The Applicant welcomes the National Landscape Officer's suggestion regarding the use of instant hedging and remains willing to discuss the detailed specification, planting methodology and establishment requirements with the Case Officer, should this be considered appropriate.

Stourton with Gasper Parish Council

The National Trust and the Planning Agent attended the Parish Council meeting, at which the proposal was discussed in detail. The concerns subsequently submitted mirror those raised by the Cranborne Chase National Landscape Officer and relate principally to the exceptional circumstances formerly required by paragraph 190 of the NPPF (now Policy N4 of the NPPF), the use of BMV land, and effects on landscape character and visual amenity. Those matters are addressed in full above and are not repeated here.

The Parish Council has suggested that, should the Local Planning Authority be minded to approve the application, the proposed new northern hedgerow should be established as an instant hedge, with mitigation planting extended along the western boundary and the existing hedge along the southern boundary reinforced.

As detailed above, the Applicant has amended the proposed landscape mitigation to incorporate a new native hedgerow along the western boundary of the Site. The Applicant remains willing to discuss the detailed specification, planting methodology and establishment requirements for the proposed hedgerow with the Case Officer, should this be considered appropriate.

In respect of the existing hedgerow along the southern boundary, this is located within land under the ownership and control of a neighbouring landowner. It therefore falls outside the application red line boundary and is not within the Applicant's control. Accordingly, the Applicant is unable to commit to reinforcement of this existing hedgerow as part of the Proposed Development.

Local Highway Authority

The Local Highway Authority raises no objection in principle to the proposed development, recognising that the principal highway impact relates to construction traffic. The submitted Construction Traffic Management Plan is considered generally acceptable, including the proposed construction traffic routing. The Authority also accepts, subject to appropriate controls, the use of the existing access from Bells Lane, and is satisfied that the proposed mitigation measures are capable of being managed appropriately during the construction period. However, prior to the issue of a formal recommendation, the Highway Authority has requested the submission of swept path analysis for 16.5m articulated vehicles at the Bells Lane access, together with any associated access improvements should these be required. In response, the requested swept path drawings are submitted alongside this letter for consideration.

The swept path analysis demonstrates that the largest anticipated construction vehicle can safely access and egress the site via the proposed construction route identified within the submitted Construction Traffic Management Plan. Whilst a minor vehicle overrun occurs on the southern side of the junction, this can be readily accommodated through a small area of temporary widening. The extent of the temporary widening is identified by the yellow hatched area on the accompanying drawing. The works comprise the temporary resurfacing of this area, together with the temporary removal of a short section of hedgerow, fencing and associated signage, all of which are contained within the application red line boundary. These temporary works will facilitate safe construction access and can be fully reinstated following completion of the 8-week construction phase.

Site Security

Following a review of the statutory consultation responses, the potential landscape and visual effects associated with the proposed CCTV cameras and supporting infrastructure have been reconsidered. In response, the Applicant has reviewed the proposed CCTV arrangement and is willing to explore a ground-based sensor system, or an alternative approach with a similar low-visibility profile, subject to further discussion and agreement with the Local Planning Authority.

A ground-based system would provide a less visually intrusive alternative to conventional CCTV infrastructure, potentially incorporating pressure, vibration or other ground-based sensors located within the perimeter of the Site to detect and signal unauthorised intrusion, without the need for above-ground camera poles. Such an approach would minimise visible security infrastructure, with no apparatus required above the height of the perimeter fencing.

However, any proposed site security would need to be compatible with the continued grazing of livestock within the Site. Therefore, the applicant is open to a condition requiring the submission and approval of a detailed security management scheme prior to installation, to ensure the chosen approach is proportionate and appropriate to the setting.

Alternative Site Selection

During the consultation period, comments have been received regarding the potential for locating the proposed solar panels above the existing car parking area at Stourhead, and why this option has not been pursued as an alternative to the proposed field-based solar array.

Siting the required solar array above the existing car park was considered at an early stage of the site selection process. However, the car park option is not considered to represent a suitable or deliverable alternative when assessed against heritage, landscape, sustainability and deliverability considerations.

The car park lies adjacent to the Registered Park and Garden, within a more open landscape with intervisibility to and from the designated asset. A canopy structure in this location would therefore have greater potential to affect its setting, whereas the field array is more contained and would result in no comparable heritage or landscape harm. A steel canopy would also carry substantially greater embodied carbon than a ground-mounted array and would require the removal of the recently re-laid car park surface, resulting in the unnecessary loss of materials and carbon already invested and undermining the sustainability objectives the scheme seeks to achieve. Finally, the canopy option is not considered financially viable for the National Trust and, as such, would not represent a deliverable alternative. Accordingly, the realistic options available to the Applicant are the proposed field-based solar scheme or no equivalent renewable energy generation at Stourhead.

Consultation Conclusion

It is acknowledged that five public representations have been received in response to the application, comprising three comments in support of the proposal and two objections. While it appears that one objection may have been prepared with the assistance of artificial intelligence, the representation has nevertheless been fully considered. The issues raised have been carefully reviewed and are considered to have been satisfactorily addressed either within this response or through the planning application documents and supporting plans previously submitted.

The Applicant considers that the additional information accompanying this letter resolves the matters arising from the consultation process and further demonstrates that the proposed development is acceptable in planning terms. The supporting technical evidence confirms that there are no outstanding technical, environmental or other material planning considerations that would justify withholding planning permission.

National Planning Policy Framework Update

The planning application was prepared and submitted under the December 2024 version of the National Planning Policy Framework (NPPF). On 17 August 2026, the Government published a substantially revised NPPF, which now constitutes the applicable national planning policy framework for the determination of the application. The revised Framework includes the separation of plan-making and decision-making policies with changes intended to establish a clearer approach to development, whilst supporting housing delivery, economic growth and the provision of critical infrastructure.

Of particular relevance to the Proposed Development, the 2026 NPPF strengthens the national policy support for renewable and low-carbon energy development, including ground-mounted solar. The December 2024 NPPF required decision-makers to give “significant weight” to the benefits associated with renewable and low-carbon energy generation and confirmed that applicants should not be required to demonstrate an overall need for renewable energy. The revised Framework strengthens this position through Policy W3: Renewable and Low Carbon Energy Development and Electricity Network Infrastructure, which requires “substantial weight” to be given to the benefits of renewable and low-carbon energy development. Policy W3 also confirms that applicants should not be required to demonstrate the need for such development. The revised Framework therefore provides an enhanced national policy basis

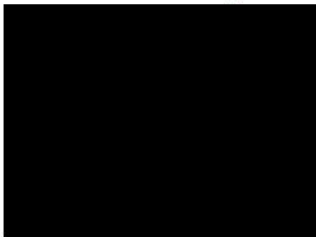
for renewable energy proposals, including ground-mounted solar, while recognising that proposals must continue to be assessed against their environmental effects and other relevant planning considerations.

The 2026 NPPF also strengthens and restructures the policy framework relating to renewable and low-carbon energy development within Protected Landscapes. The provisions previously contained within paragraphs 189 and 190 of the December 2024 NPPF have been replaced by Policy N4: Protected Landscapes. The revised policy retains the requirement for major development within Protected Landscapes to demonstrate exceptional circumstances and be in the public interest. However, the Framework must now be read alongside the strengthened national policy support for renewable and low-carbon energy development, including the requirement to attribute substantial weight to its benefits. This provides an important policy context for considering the balance between the landscape and visual effects of renewable energy proposals and their contribution to the transition to a low-carbon economy.

Whilst the Framework has been substantially restructured, the Applicant considers that the fundamental planning case remains unchanged with the Proposed Development making a direct contribution to renewable energy generation and decarbonisation, whilst supporting the sustainable operation of the Stourhead Estate and delivering wider biodiversity and nature recovery benefits.

Considering the above, we respectfully request that the Local Planning Authority proceeds with the determination of the application. We trust the enclosed information provides a robust basis for reaching a favourable decision. Should any further information or clarification be required, please do not hesitate to contact me by email or telephone.

Yours Sincerely



Zac Hemborough BSc Hons MSc MRTPI

Senior Planning Consultant

For Aardvark EM Limited

Enclosed

Existing Site Layout Plan – UTU – Ref: PL-00/Rev08

Proposed Site Layout Plan – UTU – Ref: PL-01/Rev08

Site Location Plan – UTU – Ref: SP-01/Rev08

Swept Path Analysis Drawing – AWP – Ref: 01-ATR-1001

Arboricultural Method Statement – Bosky Trees

Geophysical Survey – Substrata – Ref: 2606STO-R-1

Biodiversity Net Gain Metric - Rev B – Tyler Grange

Biodiversity Net Gain Report - Rev B – Tyler Grange - Ref: 18103_R03b_JS

Ecological Impact Assessment - Rev B – Tyler Grange – Ref: 18103_R02b_JS

Landscape and Visual Impact Assessment – Swan Paul Partnership – Ref: SPP/3417/doc.1/Rev D

Landscape Visual Impact Assessment - Figures and Plans - Swan Paul Partnership – Rev C

Landscape Visual Impact Assessment - Mitigation Plan - Swan Paul Partnership