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Planning Environment Design

Wiltshire Planning Department,
County Hall,
Bythesea Road,
Trowbridge,
BA14 8JN.

Our Ref: BIF-028B-EN
Your Ref: PL/2026/02160
Date: 10th August 2026

Sent by email only to: oliver.phippen@wiltshire.gov.uk

FAO Oliver Phippen

Dear Oliver,

RE: Consultation response (objection) received from the Wilts and Berks Canal Trust, dated 27th May 2026 for the proposed Solar Farm at the Studley Grange Landfill Site

We appreciate the detailed review undertaken and welcome the opportunity to clarify several matters raised in relation to the proposed solar farm at the Studley Grange Landfill Site. We have reviewed the Wilts and Berks Canal Trust letter and have set out a response detailed below:

Safeguarding the canal and consideration of user benefits

Biffa Group owns and manages the canal towpath, where permissive public access is provided and which connects through to the adjacent garden centre. The applicant also acknowledges that the Wilts & Berks Canal Trust holds a long lease over the canal corridor and is responsible for its restoration, operation and maintenance.

The potential effects of the proposed development on users of the canal corridor, including the towpath, have been fully assessed within the Landscape and Visual Impact Assessment (LVIA). In particular, Viewpoints 6 and 7 assess views experienced by recreational users of the permissive canal towpath. The LVIA concludes:

"Recreational users of permissive access to the Old Canal towpath would have a medium sensitivity to the proposed development. The magnitude of change would be medium... Overall, there would be a moderate adverse effect during operational phases (although effects would be neutral for certain sections when vegetation is in leaf)."

The LVIA further concludes that moderate adverse effects would be experienced by recreational users along parts of the canal towpath and associated footpath network where clear views of the proposed solar array would be available.

These conclusions have been reached by a suitably qualified and experienced landscape professional in accordance with established Landscape Institute and Institute of Environmental Management and Assessment (LI/IEMA) guidance. The assessment therefore provides an objective and proportionate evaluation of likely effects.

While the applicant accepts that some visual change will occur and that moderate adverse visual effects are predicted for some sections of the canal corridor, the assessment does not identify effects of a high, substantial or significant adverse nature. The Canal Trust's assertion that the impact on walkers would be substantial is therefore not supported by the findings of the LVIA or by the methodology used to derive those conclusions.

Furthermore, the proposal does not obstruct the canal alignment, prevent future restoration of the canal, remove public access to the towpath, or adversely affect the Canal Trust's ability to undertake future restoration and management works. The canal corridor remains safeguarded and accessible throughout the operational life of the development.

Accordingly, the applicant considers that the canal, its users and its future restoration aspirations have been appropriately recognised and assessed, and that the proposed development would not give rise to unacceptable effects on the canal corridor or its recreational function.

Heritage Value of the Canal

The Heritage Statement was prepared on a proportionate basis to identify heritage assets that could reasonably be affected by the proposed development.

The Wilts & Berks Canal is recognised as having heritage value and is acknowledged as a non-designated heritage asset. However, as the proposed development would not physically affect the canal, it was not included within the detailed heritage assessment. Wiltshire Local Plan Core Policy 58, cited by the Canal Trust, requires consideration of impacts on the setting of designated heritage assets. In contrast, for non-designated heritage assets, the policy focus is on their preservation and enhancement rather than the assessment of setting.

The Canal Trust also refers to Core Policy 54 of the Wiltshire Core Strategy. It is possible that the intention was to refer to Core Policy 53, which relates to the protection of the canal alignment. However, that policy is not relevant in this case, as the proposal would neither affect nor prejudice the canal route.

The scope of the heritage assessment was informed by the Council's scoping advice, which required assessment only of Studley Grange. Nevertheless, the Heritage Statement extended beyond this requirement and considered the potential effects on listed buildings within the wider area.

In summary, while the applicant acknowledges the heritage significance of the canal, neither the Council's scoping advice nor the relevant planning policies require a detailed assessment of its setting in this instance.

Furthermore, the proposal would not result in:

- The loss of any section of the canal alignment;
- Physical alteration to historic canal fabric;
- Severance of the canal corridor; or
- Harm to the legibility of the canal as a historic landscape feature.

The canal's historic significance would remain readily appreciable, and the potential for its future restoration would remain unaffected.

Accordingly, the applicant considers that the canal has been appropriately recognised within the assessment process and that the proposal accords with the objectives of Core Policy 58. No heritage harm to the canal as a non-designated heritage asset has been identified, and no evidence has been provided to demonstrate that the proposal would adversely affect the canal's heritage significance or prejudice its future restoration.

Ecology – Canal Buffer

The recommendation of a minimum 20m buffer between the development and canal enhanced with scrub planting and management should be read in the context of the overall ecological assessment and the function of the canal corridor as a bat commuting and foraging route. The primary mitigation measure is the retention of a substantial undeveloped buffer between the canal corridor and the solar infrastructure. The scheme incorporates this setback, ensuring that the canal corridor remains physically separated from the development and is able to continue to function effectively as an ecological corridor for bats and other wildlife.

It is important to note that the recommendation for scrub planting and management was proposed primarily as a biodiversity enhancement measure, intended to deliver additional ecological benefits and habitat improvements, rather than as essential mitigation necessary to avoid significant adverse ecological effects. This distinction is reflected in the conclusions of the Ecological Assessment, which determined that, following implementation of the proposed mitigation and enhancement measures, no significant effects on bats are anticipated. The assessment therefore demonstrates that the retention of the canal corridor buffer, together with the wider mitigation strategy incorporated within the scheme, is sufficient to maintain the ecological functionality of the corridor.

The updated Illustrative Landscape Plan has been developed having regard to a broad range of environmental, landscape, operational and site-specific design considerations. While the plan does not propose extensive areas of scrub planting immediately adjacent to the canal corridor, it nevertheless retains the undeveloped canal buffer, existing boundary vegetation and areas of grassland habitat, thereby safeguarding the ecological value and connectivity of the corridor.

In response to consultation comments, the proposed landscaping strategy has been refined to incorporate the establishment of a species-rich native hedgerow approximately 10 metres from the canal edge. The proposed location of this planting ensures that an appropriate separation distance is maintained between new vegetation and the canal corridor, avoiding encroachment into the waterway margin while providing additional habitat opportunities. Furthermore, all existing vegetation along the site boundary will be retained and protected throughout construction and operation, preserving the established green character and ecological value of the canal-side environment. The development of a hedgerow in this location will provide additional foraging opportunities for bats as the enhancement of the grassland habitats and

the sheltered nature of the corridor is likely to attract an array of invertebrate species upon which bats will forage.

The combined effect of retaining existing vegetation and introducing new native hedgerow planting will enhance the landscape framework of the site and strengthen the vegetated buffer between the development and the canal corridor. This approach will deliver measurable biodiversity benefits through the creation of additional habitat and foraging opportunities for wildlife, whilst also contributing positively to landscape character and visual amenity. The layered structure provided by the existing vegetation and proposed hedgerow will help to filter and soften views of the solar arrays and associated infrastructure from the canal and towpath. As the planting matures, it will establish a robust and naturalistic visual screen that further integrates the development into the surrounding landscape, while maintaining the openness, recreational value and distinctive character of the canal corridor.

Impacts to the Public Right of Way LTRE59 and Construction Traffic

The applicant acknowledges the Canal Trust's comments regarding the use of Public Right of Way LTRE59 and the potential interaction between pedestrians and construction traffic.

The Transport Statement and Construction Management Plan identify the proposed construction access arrangements and assess the suitability of the existing access route for the anticipated construction traffic associated with the development. The route has been selected specifically to minimise interactions with the wider highway network and sensitive receptors.

The applicant recognises that the access lane is also designated as Public Right of Way LTRE59 and is used by walkers accessing the canal towpath network and surrounding rights of way. However, the shared use of access tracks and minor rural lanes by both pedestrians and vehicles is not unusual in the countryside and does not, in itself, give rise to an unacceptable safety risk.

Construction traffic movements would be temporary in nature and limited to the construction phase. The volume of vehicle movements would be controlled through the Construction Management Plan, and all drivers would be required to comply with site-specific traffic management procedures, including appropriate speed restrictions, driver awareness measures and warning signage where necessary.

The applicant is committed to implementing appropriate construction traffic management measures through the Construction Management Plan. These measures can include contractor induction requirements, speed controls, warning signage and ongoing monitoring of construction vehicle activities to ensure that potential interactions with users of Public Right of Way LTRE59 are appropriately managed. For example, where the proposed maintenance road crosses the Public Right of Way (PROW), the PROW will be protected and maintained in a safe, accessible, and unobstructed condition throughout both the construction and operational phases of the development. Formal crossing points will be provided where the maintenance road intersects the PROW to facilitate the safe passage of pedestrians. These crossing points will incorporate appropriate surfacing, signage and visibility measures, where required, to minimise potential conflict between maintenance vehicles and PROW users while maintaining the continuity, safety and usability of the existing route.

During the operational phase of the solar farm, vehicle movements will be negligible, being limited primarily to occasional maintenance visits, inspections and any infrequent repair activities. As a result, the maintenance road will experience very low traffic volumes,

significantly reducing the potential for interaction between vehicles and PROW users. Consequently, the proposed crossing arrangements are considered appropriate to ensure the continued safe and convenient use of the Public Right of Way throughout the lifetime of the development.

Accordingly, the applicant considers that the use of the access lane by pedestrians has been adequately recognised, that any potential effects would be temporary and manageable, and that no additional mitigation or alteration to the proposed access arrangements is necessary. There is therefore no evidence that the proposal would result in an unacceptable impact on users of Public Right of Way LTRE59 or the adjacent canal corridor.

Flood Risk, Drainage and the Canal Corridor

The applicant acknowledges the Canal Trust's concerns regarding drainage conditions on the south-facing slope above the canal and the historic failure of the gabion wall. However, there is no evidence to indicate that the proposed solar development would adversely affect site drainage or increase risks to the canal corridor.

The Flood Risk and Drainage Impact Report concludes that the proposed development will not result in a significant change to the rate or volume of surface water runoff from the site. The development has been designed to retain the existing landfill restoration drainage arrangements and does not involve substantial areas of impermeable surfacing that would materially alter the site's hydrological characteristics.

The Canal Trust refers to Paragraph 4.13 of the Preliminary Ecology Report, which notes that vegetation on parts of the south-facing slope is more characteristic of wet pasture. However, the presence of wet grassland species is not, in itself, evidence that the landfill restoration drainage system is defective or incomplete. Vegetation communities can be influenced by a range of factors, including localised soil conditions, groundwater influences, topography, historic land management practices and seasonal variation in moisture levels. Ecological observations should therefore not be interpreted as evidence of drainage failure.

The applicant is not aware of any evidence demonstrating that the historic failure or condition of the gabion wall has been caused by deficiencies in the approved landfill restoration drainage scheme.

The proposed solar development would not modify the approved landfill restoration profile, obstruct existing drainage pathways or introduce drainage characteristics that would increase runoff toward the canal corridor.

Visual Impact on the Wilts and Berks Canal and its Users

The applicant acknowledges the Canal Trust's concerns regarding the visual relationship between the proposed development and the Wilts & Berks Canal.

The methodology adopted within the LVIA provides a structured and objective assessment of visual effects, taking account of receptor sensitivity, existing landscape context, extent of visibility and the nature of the proposed change. The resulting assessment concludes that effects would be moderate adverse rather than significant or substantial.

While the applicant accepts that some change in views would occur, landscape and visual effects are an inevitable consideration for many forms of development in rural areas. The LVIA demonstrates that these effects are limited to moderate adverse impacts from certain sections of the canal corridor and do not give rise to unacceptable harm. Accordingly, the applicant considers that the proposal strikes an appropriate balance between renewable energy generation and the protection of local landscape and recreational interests.

For these reasons, the applicant does not agree that the development would significantly degrade the experience of canal users or result in a level of harm that would justify withholding planning permission. The effects have been appropriately assessed, transparently reported and found to be acceptable in planning terms.

Proposed Visual Screen along the Canal Corridor

The applicant has given careful consideration to the Canal & River Trust's request for the provision of a substantial hedgerow buffer between the proposed development and the canal corridor. In response, the proposed landscaping strategy (see enclosed updated Landscaping Plan Ref: SF036100 Rev A) has been updated to include the establishment of a mixed native hedgerow positioned approximately 10 metres from the canal edge. This ensures that an appropriate setback is maintained between the planting and the canal corridor. In addition, all existing vegetation along the site boundary will be retained and protected, preserving the established green character of the canal-side environment.

The combination of retained vegetation and new native hedgerow planting will strengthen the landscape buffer, enhance biodiversity, and create a layered green screen that will effectively soften views of the proposed development from the canal and towpath. As the hedgerow matures, it will provide a robust and natural visual barrier, helping to integrate the development into the surrounding landscape while maintaining the amenity and character of the canal corridor.

As the hedgerow matures, it will provide increasingly effective visual filtering of the proposed development when viewed from both the canal and the adjacent towpath. The enhanced landscaping will break up and soften views of the built form, reducing its perceived prominence and helping the development to assimilate more successfully into the surrounding landscape.

Consequently, the proposed hedgerow will make a significant contribution towards mitigating the visual effects of the scheme and directly addresses the Canal & River Trust's concerns regarding the experience of canal users, boaters and pedestrians travelling along the waterway and towpath corridor.

Overall, the revised landscaping proposals represent a positive and proportionate response to the Trust's comments and will ensure that the character, appearance and amenity value of the canal corridor are preserved and enhanced over the long-term.

Conclusion

We trust that the above clarifications assist in addressing the Wilts and Berks Canal Trust concerns. The applicant is committed to working collaboratively with Wiltshire Council to resolve

any outstanding matters and we welcome the opportunity to discuss these matters further should this be required.

Yours sincerely,

Gemma Newall

Encl:

Updated Landscaping Plan Ref: SF036100 Rev A