

Planning, Design and Access Statement

for a

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



September 2026 – Part Addendum



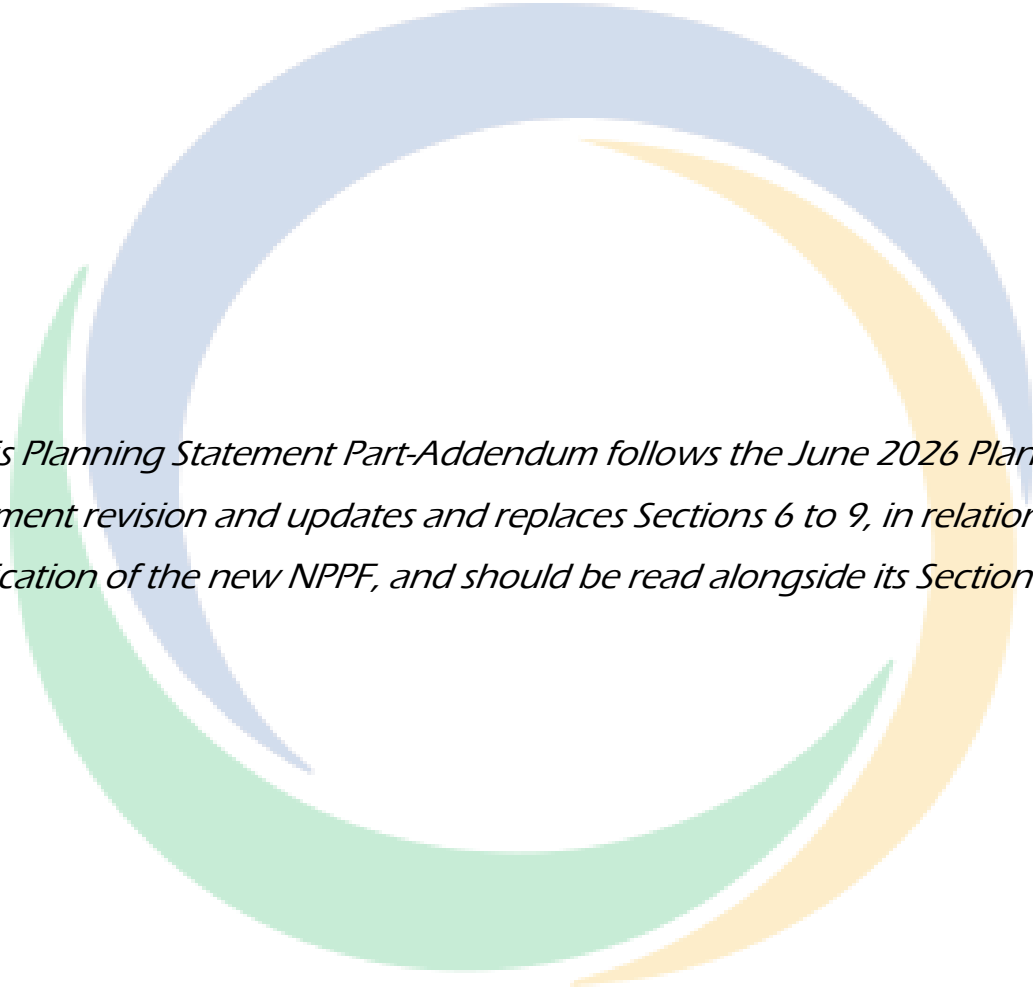
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This Planning Statement Part-Addendum follows the June 2026 Planning Statement revision and updates and replaces Sections 6 to 9, in relation to the publication of the new NPPF, and should be read alongside its Section 1 to 5.

Statement Revision and Issue Date	Report Author	Position	Signed off By	Position
Part Rev 2 Sept 2026	Steven Bainbridge BSc MSc MRTPI	Head of Planning	Mark Harding	European Development Director

6. Development Plan

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework published in August 2026 is a material consideration of particular importance because it now contains national decision-making policies to be applied alongside the development plan.

6.2 In this case the development plan consists of:

- Wiltshire Core Strategy 2015¹
- Saved Policies of the 2011 Salisbury District Local Plan

6.3 The August 2026 NPPF materially changes the approach taken in the June 2026 version of this statement. It distinguishes between plan-making policies and national decision-making policies. Annex A confirms that the new Framework applies as a material consideration from publication, that materially inconsistent development plan policies or parts of policies should be given very limited weight, and that older policies should not be down-weighted merely because of their age.

6.4 Policy S3 applies a presumption in favour of sustainable development and directs proposals outside settlements to S5. Policy S5 expressly identifies engineering operations and infrastructure, including energy infrastructure, as development which should be approved outside settlements unless the benefits are substantially outweighed by adverse effects when assessed against the national decision-making policies as a whole.

The Wiltshire Core Strategy therefore remains the statutory starting point. Its relevant policies continue to attract normal development plan weight insofar as they are materially consistent with the national decision-making policies; any materially inconsistent part attracts very limited weight under Annex A.

6.5 This replaces the earlier proposition in this statement that strategic policies could only justify refusal where a proposal prejudiced delivery of the Core Strategy as a whole. The correct approach is now to apply the development plan alongside S5 and the other national decision-making policies, including W3 for renewable energy and N4 for Protected Landscapes. Local policies can identify and assess site-specific constraints, but should not be interpreted as imposing a more restrictive decision rule than the Framework now expressly provides.

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

- Core Policy 1 Settlement Strategy
- Core Policy 2 Delivery Strategy
- Core Policy 3 Infrastructure Requirements
- Core Policy 20 Spatial Strategy for the Salisbury Community Area
- Core Policy 41 Sustainable Construction and Low Carbon Energy
- Core Policy 42 Standalone Renewable Energy Installations

¹ 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 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, the proposal strongly supports its purpose by supplying renewable electricity locally to the consented EV hub. That relationship is now reinforced by national decision-making policy CC2(1)(e), which supports co-location of energy generators and users, and by W3, which requires substantial weight to be given to relevant renewable-energy benefits.
- 6.12 **Core Policy 42** concerns standalone renewable energy proposals and provides clear development plan support for renewable energy subject to the satisfactory assessment of site-specific constraints. It should now be read consistently with S5 and W3: the policy requires impacts to be assessed and taken into account, rather than requiring the absence of all harm. Where Protected Landscape effects are engaged, the specific route is provided by N4. We respond to Core Policy 42's assessment requirements below, insofar as they are relevant, determinative or useful:

Core Policy 42	Our response
<i>Proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site specific constraints. In particular, proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account:</i>	Whilst this scheme is not standalone, the general support for renewable energy schemes is noted.
<i>i. The landscape, particularly in and around AONBs</i>	This planning application includes the Landscape and Visual Impact assessment which underpins the Environmental Statement, satisfactorily assessing the

	scheme in landscape terms. Cumulative assessment of nearby development, including the EV hub, is part and parcel of that assessment.
<i>ii. The Western Wiltshire Green Belt</i>	Not relevant.
<i>iii. The New Forest National Park</i>	Not relevant.
<i>iv. Biodiversity</i>	Site specific surveys have been undertaken, with mitigation recommended and Biodiversity Net Gain proposals in addition, demonstrating that biodiversity has been satisfactorily assessed.
<i>v. The historic environment including the Stonehenge and Avebury World Heritage 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 proposals to demonstrate how they protect biodiversity. The submitted ecology survey and report does this. The policy prefers retention and management of features on site, with mitigation where necessary. The proposal goes materially beyond the statutory minimum and delivers +143.69% in area habitat units and +84.12% in hedgerow units. National policy N2(3) expressly allows proposals to incorporate biodiversity enhancements beyond the statutory biodiversity net gain objective.
- 6.15 **Core Policy 51** concerns landscape. It requires development to protect, conserve and where possible enhance landscape character, and seeks to avoid harmful impacts through

assessment, sensitive design, mitigation and enhancement. It remains relevant and is to be applied alongside N4, which now contains the national decision-making policy for Protected Landscapes and requires substantial weight to be placed on the importance of conserving and enhancing natural beauty.

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** also requires proposals within the AONB, now referred to in national policy as a Protected Landscape and commonly as a National Landscape, to take account of the objectives, policies and actions in the relevant management plan. These matters are discussed in the Material Considerations section below. The LVIA identifies an overall moderate adverse effect on the National Landscape, which must be assessed through the specific N4 framework rather than treated as an automatic bar to development.
- 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 high quality design. It remains relevant and is now reinforced by national decision-making policy DP3, which requires proposals to respond to their context

and to reflect relevant design principles according to the nature and location of the development.

6.20 For energy infrastructure, good design remains a blend of form and function. DP3 provides the national decision-making framework for design and requires substantial weight to be given to compliance with relevant development plan design policies when assessing design quality.

6.21 The approach in NPS EN-1 Section 4.7, 'criteria for good design for energy infrastructure', remains an important technology- and infrastructure-specific material consideration. It supplements the generic design principles in DP3 and is especially useful in judging the functional requirements of energy infrastructure. NPS EN-1 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.

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- 6.25 **Core Policy 58** seeks to ensure conservation of the historic environment and is broadly consistent with national decision-making policies HE4 to HE7. The Heritage Impact Assessment concludes that the assessed settings are not sensitive to the proposed change and identifies no harm to the significance of the assessed designated heritage assets. The archaeological assessment identifies low potential and limited ground impacts, with further investigation capable of being secured by condition. On the submitted evidence there is no conflict with Core Policy 58.
- 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 alongside the August 2026 national decision-making policies. The Core Strategy remains the statutory starting point, but Annex A requires any materially inconsistent part of a development plan policy to be given very limited weight. The relevant policies concerning climate change, renewable energy, biodiversity, landscape, design, the historic environment and flood risk are capable of being applied consistently with the new Framework and the proposal satisfies their substantive objectives.
- 6.28 Of particular importance, S3 and S5 now provide the national decision rule for development outside settlements, while W3 prescribes substantial weight for renewable-energy benefits and N4 provides the specific assessment for the Protected Landscape. Read together with the development plan, those policies support the principle of this private-wire solar array subject to the detailed balance undertaken below. Saved policies of the Salisbury District Local Plan identify no conflict that alters that conclusion.

7. Material Considerations

- 7.1 There are a wide range of material considerations in this case:
- National Planning Policy Framework August 2026
 - Wiltshire Local Plan Review
 - 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 National Landscape Partnership Plan 2025 to 2030
- Wiltshire Renewable Energy Study Landscape Sensitivity Assessment 2023
- Wiltshire Local Transport Plan 4

National Planning Policy Framework August 2026

- 7.2 The National Planning Policy Framework published on 17 August 2026 replaces the December 2024 Framework. Its national decision-making policies apply immediately as material considerations and are to be read alongside the development plan.
- 7.3 Annex A is important to the relationship between local and national policy: materially inconsistent development plan policies, or parts of policies, should be given very limited weight, while policies should not be down-weighted merely because they pre-date the new Framework.

S3 and S5 - Principle of Development Outside Settlements

- 7.4 Policy S3 applies the presumption in favour of sustainable development and directs proposals outside settlements to S5. S5(1)(a) expressly includes engineering operations and infrastructure, including **energy infrastructure, among the forms of development which should be approved unless the benefits of doing so would be substantially outweighed by adverse effects** when assessed against the national decision-making policies as a whole.
- 7.5 This is a materially clearer and more positive decision rule than applied when the application was submitted. The proposed solar array is energy infrastructure outside a settlement and therefore falls within S5(1)(a). Because it lies within a Protected Landscape, N4 must be applied within that S5 assessment; the designation is not bypassed, but nor does it displace the S5 decision rule once N4 has been properly applied.

W3 - Renewable and Low Carbon Energy Development

- 7.6 Policy W3(1)(a) requires **substantial weight to be given to the benefits of renewable and low-carbon energy development for improving energy security, supporting economic development and/or the transition to a net zero future**. W3(2) confirms that applicants should not be required to demonstrate need and that proposals outside areas identified as suitable in the development plan are to be assessed against the national decision-making policies taken as a whole. W3(3) also requires time-limited schemes to provide for decommissioning and restoration.
- 7.7 The proposal directly engages all three benefits identified in W3(1)(a): domestic renewable generation improves energy security, supports investment in the clean-energy and electric-mobility economy, and contributes to net zero by supplying a consented EV charging hub by private wire. Substantial positive weight is therefore prescribed by national policy rather than

merely invited as a matter of planning judgement.

CC2 - Climate Change Mitigation and Co-location

- 7.8 Policy CC2 requires development to contribute to climate change mitigation and the transition to net zero where relevant. Of particular importance here, CC2(1)(e) supports taking opportunities to co-locate energy generators and users, while CC2(2) gives substantial weight to relevant benefits from drawing energy from renewable and low-carbon sources through development.
- 7.9 The proposal is an unusually direct example of that policy objective: a 3MW solar array is co-located with its principal electricity user, the consented EV hub, so that generation and transport-energy demand are brought together at source through a private-wire arrangement.

E2 - Economic Development

- 7.10 The economic case is now embedded within W3 itself, which requires **substantial weight to the renewable-energy benefits which support economic development**. The scheme represents private investment in clean-energy infrastructure and supports the electric-mobility sector and associated design, engineering, construction and operational activity.
- 7.11 This is not a generic claim that every commercial proposal should receive substantial weight. It is a benefit specifically identified by W3 in the context of renewable and low-carbon energy development and should be weighed accordingly, without double-counting the same benefit under multiple policy headings.

N4 - Protected Landscapes

- 7.12 Policy N4(1) requires development within Protected Landscapes to be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities. It also requires substantial weight to be placed on the importance of conserving and enhancing natural beauty. That formulation gives substantial policy importance to the designation; it does not state that every identified adverse effect must itself automatically be given substantial weight irrespective of its scale, extent, duration and mitigation.
- 7.13 For robustness, this statement continues to assess the proposal on the precautionary basis that it could be regarded as major development for the purposes of N4(2).
- 7.14 N4(2) requires refusal of major development other than in exceptional circumstances and where it can be demonstrated to be in the public interest, having regard to the following matters.

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

- 7.15 W3 now supplies a direct national policy answer to the weight attached to the renewable-energy case: substantial weight must be given to the relevant energy-security, economic-development and net-zero benefits, and an applicant is not required to demonstrate overall need. Nevertheless, the particular need and public-interest case here is stronger than a generic renewable-energy case because the array is functionally linked to the adjacent consented EV hub.
- 7.16 The proposal will supply renewable electricity at source through a private-wire arrangement. That relationship supports transport decarbonisation on the Strategic Road Network, reduces

the hub's call on grid electricity when the array is generating, and gives the scheme a clear local as well as national public-interest purpose.

7.17 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 tranquillity and landscape quality at the valley floor. Locating the solar development in this context avoids more remote, tranquil and visually sensitive parts of the National Landscape and is a proportionate response to the identified need.

7.18 At a local level, the development supports rural economic diversification and continued private investment in clean energy and transport infrastructure. Refusal would forgo those benefits and the opportunity for generation and demand to be co-located in the manner now expressly supported by CC2.

(b) The cost of, and scope for, developing outside the Protected Landscape, or meeting the need in some other way

7.19 The scope for meeting the identified private-wire need outside the Protected Landscape is materially constrained by the location of the consented EV hub. The LVIA confirms that the site has been selected because of its proximity to that hub, its containment by landform and vegetation, and its location within an infrastructure-influenced transport corridor.

7.20 Relocating the array outside the Protected Landscape would sever or materially weaken the co-location and private-wire relationship, require additional connection infrastructure and land rights, increase cost and losses, and reduce the efficiency of the scheme. Rooftop generation at the EV hub forms part of the wider project but does not provide a realistic substitute for the output of the proposed ground-mounted array.

7.21 The LVIA demonstrates that the chosen site has medium landscape sensitivity, with opportunities for mitigation, and a medium ability to accept change, particularly when compared with more open and tranquil parts of the National Landscape.

7.22 In this context, no preferable realistic alternative has been identified which would meet the particular private-wire objective in a materially less harmful way.

(c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

7.23 The LVIA provides a comprehensive site-specific assessment of landscape and visual effects at site, local and wider landscape scales. Those findings, rather than a strategic sensitivity study in isolation, provide the most relevant evidence of the actual effects of this proposal.

7.24 At the site and immediate surroundings, the LVIA identifies a major to moderate adverse landscape effect, reflecting the change from arable land to solar development. The effect is localised and moderated by retained and reinforced hedgerows, new woodland and orchard planting, grassland enhancement and the reversible nature of the development.

7.25 At the scale of the National Character Area, the magnitude of change is assessed as low, with an overall slight to moderate adverse effect, reflecting the limited geographical extent of visibility and the site's relationship with existing infrastructure.

7.26 Within the Cranborne Chase National Landscape, the LVIA identifies an overall moderate adverse effect. The proposal is small in scale relative to the designation, retains and enhances field boundaries and is located in an area influenced by the A303, the consented EV hub and overhead electricity infrastructure.

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- 7.27 Visual effects are similarly concentrated. The greatest effects arise for users of routes closest to the site, where major to moderate adverse effects reduce as mitigation planting establishes. Visibility from the A303 and nearby roads is substantially more limited.
- 7.28 Effects on long-distance routes such as the Monarch's Way are limited, distant and slight to moderate adverse, with no effects identified on the Wessex Ridgeway.
- 7.29 N4(2)(c) also requires recreational opportunities to be considered, not simply visual effects on recreational users. The proposal introduces a new permissive walking route linking CHIC4 and CHIC5. That is a positive recreational effect and is directly supported by policy TR8, which encourages opportunities to extend, link and improve existing routes. Taken as a whole, the environmental and recreational effects are localised, moderated and reversible.

Conclusion on N4 and S5

- 7.30 The proposal demonstrates exceptional circumstances and a clear public-interest case under N4(2): the national policy importance of renewable energy is now expressly reflected in W3; the private-wire relationship materially constrains realistic alternatives; and the adverse landscape and visual effects are moderate overall, localised, mitigated and reversible. N4 therefore does not require refusal. Having applied N4, S5 then requires the energy-infrastructure proposal to be **approved unless its benefits are substantially outweighed by adverse effects. On the evidence, that threshold is not met.**

N2 - Natural Environment, Agricultural Land and Biodiversity

- 7.31 Policy N2(1)(b) requires proposals to take account of agricultural land quality, including best and most versatile land and its grade, and, where significant development of agricultural land is necessary, to use poorer quality land where possible.

The Agricultural Land Classification work identifies the panel area as Subgrade 3a and explains why the poorer-quality Subgrade 3b land within the wider site is not a practicable alternative: it lies on sloping land to the north, is unsuitable for the panel layout and would be detached from the EV hub. The use is temporary and reversible and grazing can continue. The evidence therefore addresses the precise question now posed by N2(1)(b).

- 7.32 Policy N2(3) expressly recognises that development proposals may incorporate biodiversity enhancements which exceed the statutory biodiversity net gain objective. Its restriction concerns attempts to require above-statutory gains through development plan policies outside the stated circumstances; it does not remove weight from voluntary enhancement delivered by a proposal.
- 7.33 Here the amended biodiversity metric identifies +143.69% in area habitat units and +84.12% in hedgerow units. Those gains are far above the statutory minimum and remain a substantial environmental enhancement to be weighed positively in the planning balance.

TR8 - Public Rights of Way

Policy TR8 requires development proposals to protect and enhance the public rights of way network and to take opportunities to extend, link or improve routes where this improves access to the countryside or creates new direct or circular connections. The proposed permissive link between CHIC4 and CHIC5 responds directly to that policy and to the Council's Rights of Way officer.

DP3 - Design

- 7.34 Policy DP3 provides the new national decision-making test for design. It requires development

to respond to context and gives substantial weight to compliance with relevant development plan design policies when design quality is assessed. The low-profile layout, use of existing topography and vegetation, retention of field boundaries, landscape mitigation, reversibility and functional relationship with the EV hub all support the design case. NPS EN-1 remains a useful energy-infrastructure-specific complement to DP3.

HE4 to HE7 - Historic Environment

- 7.35 The new heritage policies distinguish expressly between positive effect, no effect and harm. The submitted Heritage Impact Assessment concludes that the assessed designated heritage assets would experience no harm to their significance; substantial weight is nevertheless given to their conservation under HE6. The archaeological assessment identifies low potential and limited ground disturbance, and the Council's archaeologist raises no objection subject to a programme of investigation secured by condition. The heritage evidence therefore identifies no matter which would outweigh the proposal's benefits.

Wiltshire Local Plan Review (withdrawn)

- 7.36 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.
- 7.37 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.
- 7.38 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

- 7.39 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
- 7.40 Climate change mitigation and adaptation were identified as cross-cutting priorities running through the Plan as a whole, rather than isolated policy considerations.
- 7.41 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
- 7.42 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.
- 7.43 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

- 7.44 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.
- 7.45 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.
- 7.46 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

- 7.47 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.
- 7.48 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.
- 7.49 Accordingly, the withdrawn Local Plan Review carries no weight as an adopted or emerging development plan policy. Its evidence and former strategic direction may provide background context, but the decision should rest on the adopted development plan and the national decision-making policies in the August 2026 Framework.

Clean Power 2030 Action Plan December 2024

- 7.50 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

- 7.51 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

- 7.52 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

- 7.53 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.
- 7.54 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

- 7.55 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.
- 7.56 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)

- 7.57 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)

- 7.58 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)

- 7.59 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)

- 7.60 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

- 7.61 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)

- 7.62 *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.
- 7.63 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.
- 7.64 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 National Landscape Partnership Plan 2025 to 2030

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- 7.65 The current statutory management document is the Cranborne Chase National Landscape Partnership Plan 2025-2030. It is a material consideration and provides the current framework for conserving and enhancing the natural beauty and special qualities of the National Landscape.
- 7.66 The Partnership Plan is not itself a development plan decision rule. It informs the site-specific assessment under Core Policy 51 and N4, including landscape character, tranquillity, dark skies, nature recovery, heritage and the management of change within the National Landscape.
- 7.67 The proposal has been designed in that context. The LVIA identifies moderate adverse effects on the National Landscape but also confirms their limited geographical extent, the influence of the A303 and consented EV hub, and the scope for mitigation. The landscape framework retains existing features and adds hedgerow, woodland, orchard and grassland planting, while the proposal remains temporary and reversible.

Wiltshire Local Transport Plan 4

- 7.68 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.
- 7.69 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

- 7.70 The Council's Landscape Sensitivity Study is a material consideration, but its role and weight in decision-making must be correctly understood.
- 7.71 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

- 7.72 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.

7.73 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

7.74 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.

7.75 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+.

7.76 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.

7.77 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.

7.78 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.

- 7.79 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

- 7.80 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.
- 7.81 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.
- 7.82 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 by arbitrary thresholds. The August 2026 decision-making framework instead requires the actual proposal to be assessed under S5, W3 and, in this location, N4, with its site-specific effects and benefits weighed on the evidence.

Relationship to Site-Specific Assessment

- 7.83 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.
- 7.84 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.
- 7.85 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

- 7.86 It is acknowledged that the site lies within the Cranborne Chase National Landscape, a Protected Landscape for the purposes of N4. N4(1) requires substantial weight to be placed on the importance of conserving and enhancing its natural beauty. Neither N4 nor the statutory designation, however, creates an absolute prohibition on renewable energy development.
- 7.87 The correct approach is the specific N4 assessment set out above. On the precautionary

assumption that the proposal is major development, the exceptional-circumstances and public-interest test in N4(2) applies. The Landscape Sensitivity Study does not displace that statutory and national-policy exercise, nor the requirement to consider the particular site, design, mitigation and public benefits.

- 7.88 In this case, the LVIA demonstrates that the proposal's effects on landscape character and visual amenity are moderate overall, localised, time-limited and capable of moderation, and that the scheme does not fundamentally undermine the special qualities of the National Landscape.

Weight in the Planning Balance

- 7.89 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.

- 7.90 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 express national decision-making support in S5 and W3 for renewable energy infrastructure, energy security, economic development and the transition to net zero.

- 7.91 When considered in this way, the Landscape Sensitivity Study does not identify an adverse effect capable of substantially outweighing the proposal's benefits or otherwise requiring refusal under N4 or S5.

Material Considerations Conclusion

- 7.92 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.

- 7.93 Taken together, these considerations add substantial positive weight in favour of the proposal. Read through S5, W3 and N4, they do not identify adverse effects which substantially outweigh the benefits or otherwise require refusal.

8. Planning Balance

- 8.1 In the planning balance, this statement distinguishes between the extent of a benefit or harm and the policy weight to be given to it. The August 2026 NPPF now expressly prescribes 'substantial weight' for particular considerations, including the renewable-energy benefits in W3 and the importance of conserving and enhancing natural beauty in N4. Those policy terms are applied as written rather than treating 'significant', 'substantial' and 'great' as automatically interchangeable.

- 8.2 The overarching decision rule is S5. Because the proposal is energy infrastructure outside a settlement, it should be approved unless its benefits are substantially outweighed by adverse effects when assessed against the national decision-making policies as a whole. N4 is applied as part of that exercise because the site lies within a Protected Landscape.

Planning considerations weighing in favour of the scheme

The Need for Renewable Energy Generation

- 8.3 The scheme has an installed capacity of 3MW and will supply the adjacent EV hub through a private-wire connection, offsetting part of the hub's demand from the grid whenever the array is generating.
- 8.4 There remains an urgent and compelling need for renewable and low-carbon energy, but the August 2026 Framework makes the planning position more direct: W3(2) says applicants should not be required to demonstrate need for renewable or low-carbon energy development.
- 8.5 S5(1)(a) expressly identifies energy infrastructure as a form of development which should be approved outside settlements unless the benefits are substantially outweighed by adverse effects assessed against the national decision-making policies.
- 8.6 More importantly for weight, W3(1)(a) now requires substantial weight to be given to the benefits of renewable and low-carbon energy development for improving energy security, supporting economic development and/or the transition to net zero. Previous appeal decisions remain useful context, but it is no longer necessary to infer the appropriate policy weight from appeal precedent: the Framework now states it expressly.
- 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 by meeting part of the EV hub's electricity demand at source and reducing its call on the local network when the array is generating. The renewable-energy benefit therefore attracts substantial weight under W3.
- 8.9 The urgency of renewable deployment is common ground in national energy policy. For this decision, however, the important change is that W3 now settles the minimum policy treatment: substantial weight should be given to the relevant benefits.
- 8.10 Taking all of the above into account, the 3MW private-wire solar array provides a significant renewable-energy benefit which should be afforded substantial weight in favour of planning permission.

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

Climate Emergency

- 8.11 The August 2026 Framework continues to make clear through W3(2) that applicants need not demonstrate overall need for renewable energy. The wider climate evidence remains relevant to understanding why the transition to net zero carries the substantial weight now prescribed by W3.
- 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 remains an important statement of Government policy on the urgency of clean-energy deployment. It is now reinforced at decision-taking level by CC2, which requires relevant development to contribute to climate change mitigation and expressly supports co-location of energy generators and users.

8.18 The climate-mitigation benefit is significant and attracts substantial positive weight through W3 and CC2. Because this overlaps with the renewable-generation and net-zero benefit identified above, it is taken into account as part of the same substantial policy case rather than double-counted as a second identical 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 domestically generated renewable electricity through a private wire and will reduce the hub's call on the National Grid when the array is generating. That directly engages the energy-security limb of W3(1)(a), as well as the wider Government policy on energy security.

8.20 Energy security remains a material benefit in its own right conceptually, because it concerns resilience and reduced exposure to imported energy as well as carbon reduction. The important policy change is that W3 now expressly includes improving energy security among the renewable-energy benefits to which substantial weight should be given.

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

8.21 NPS EN-3 similarly distinguishes solar's role in low-cost decarbonisation from its contribution to greater energy independence. That national energy-policy context reinforces, rather than creates, the substantial weight now prescribed by W3.

"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 Accordingly, the proposal's contribution to energy security is a significant benefit and forms an express basis for substantial positive weight under W3(1)(a).

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 At local level, the relevant design context is provided principally by Core Policies 41, 42, 51 and 57. Nationally, DP3 now supplies the generic decision-making policy for design, while NPS EN-1 provides the more specific design principles for energy infrastructure.
- 8.30 That combination is more useful than applying generic built-development expectations mechanically to solar infrastructure. The scheme should be judged by how effectively its siting, layout, technology, landscape framework and reversibility respond to its context and functional purpose.
- 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 DP3(3) requires substantial weight to be given to compliance with relevant development plan policies when assessing design quality. We remain content that the scheme complies with Core Policy 57 and the other relevant local design expectations insofar as they reasonably apply to this form of infrastructure.

8.34 The scheme therefore represents good functional and contextual design. We identify a moderate design benefit and, consistently with DP3(3), give substantial weight to its compliance with the relevant development plan design policies.

Good design and efficient use of land				
Benefits	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
		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 addition to the route network is limited in length, but it responds directly to the Council's Rights of Way officer and to TR8, which encourages opportunities to link and improve existing routes and create new direct or circular connections. We therefore identify a minor benefit to which moderate positive weight should be given.

Rights of Way				
Benefits	Significant			
	Moderate			
	Minor/limited			
	None			
		None	Minor/Limited	Moderate
		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
		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 world². 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*

² [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 The proposal's +143.69% gain in area habitat units and +84.12% gain in hedgerow units is far in excess of the statutory minimum. N2(3) expressly permits proposals to incorporate biodiversity enhancements beyond the statutory objective. In the context of the scale of the uplift and the wider biodiversity crisis, we regard this as a significant environmental benefit to which significant positive weight should be applied.

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

Economic Development

8.48 The August 2026 Framework provides a stronger and more specific basis for the economic case than the former NPPF paragraphs relied on in the June statement. W3(1)(a) expressly requires substantial weight to be given to renewable-energy benefits which support economic development. Policy E2 also requires substantial weight to relevant economic benefits of commercial development which allows businesses to invest, expand or adapt.

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 The economic benefit is therefore not dependent on a generic claim that all development generates growth. It arises from private investment in a sector which national energy policy expressly links to economic development, and W3 directs substantial weight to that benefit.

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.

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

- 8.53 The renewables industry contributes to investment, skills and the wider clean-energy supply chain. In this case the relevant economic benefit is reinforced by the functional link to EV charging infrastructure and by the co-location of renewable generation and demand.
- 8.54 We identify a moderate level of economic benefit to the green economy, to which substantial weight should be applied under W3(1)(a).

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 Policy E4(1)(b) supports the development and diversification of agricultural and other land-based businesses. The proposal therefore continues to receive national policy support as a farm-diversification measure, subject to the other national decision-making policies.
- 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
		Significant/ substantial/ great		
		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 Policy N2(1)(b) now provides the relevant national decision-making policy for agricultural land. It requires development proposals to take account of agricultural land quality, including best and most versatile land and its grade, and, if significant development of agricultural land is necessary, to use areas of poorer quality land where possible.
- 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 The proposal does not permanently remove the BMV resource. It is a temporary and reversible use, grazing can continue, physical disturbance is limited and the land can be restored to full agricultural use. The ALC also explains why the poorer-quality Subgrade 3b land in the wider site is not a practicable alternative for the array because of its slope and separation from the EV hub.
- 8.66 On that evidence, the proposal addresses the precise requirement of N2(1)(b): poorer-quality land has been considered and is not a practicable alternative within the site. At most, the use of Subgrade 3a land gives rise to a minor residual policy concern, to which only minor weight should be given; there is no loss of the BMV resource 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 at wider scales and that the effect on the Cranborne Chase National Landscape is moderate adverse over an intermediate area for the operational lifetime of the scheme.
- 8.69 Policy N4(1) requires substantial weight to be placed on the importance of conserving and enhancing the natural beauty of the Protected Landscape. That is not the same as automatically assigning substantial weight to every degree of adverse effect: the actual scale, extent, duration and mitigation of the effect remain part of the assessment, and major development is then

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

subject to the specific N4(2) test.

- 8.70 On the LVIA evidence, we identify a moderate adverse landscape effect which is localised, diminishes as mitigation establishes and is reversible at decommissioning. We apply to that assessment the substantial policy importance which N4 requires for conserving and enhancing the National Landscape.

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 The designated status and the recreational use of nearby routes are important under N4, but the policy does not convert every close-range visual effect into 'great' harm. The LVIA identifies where the greatest effects occur and also demonstrates their limited geographical extent and reduction over time. The proposal will often be experienced in the context of the A303, the EV hub and overhead electricity infrastructure.
- 8.73 We therefore identify a moderate adverse visual effect overall, applying the substantial policy importance required by N4 while recognising the actual scale and extent of the effects. The new permissive CHIC4-CHIC5 link is a separate recreational benefit under TR8.

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

Heritage

- 8.74 The submitted Heritage Impact Assessment concludes that the assessed settings are not sensitive to the proposed change and identifies no harm to the significance of the assessed designated heritage assets. The archaeological assessment identifies low potential and limited ground disturbance, with further work capable of being secured by condition.
- 8.75 Under HE5 and HE6, substantial weight must be given to the conservation of designated heritage assets, and any identified harm would be a matter of considerable importance and weight. However, where the submitted assessment identifies no effect on significance, there is no designated-heritage harm to weigh. Any residual archaeological effect is limited and can be managed through the condition requested by the Council's archaeologist.

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

Planning consideration that are neutral in the balance

Highways and access

8.76 Vehicular access has been revised since submission and is now proposed via Seymour Farm / the existing A303 access north of Chicklade Crossroads, rather than through the EV hub. The updated Construction and Operational Traffic Management Plan concludes that the development is acceptable in transport terms and identifies no residual highway-safety or network-capacity impacts. National Highways has indicated support in principle for the revised access subject to an appropriate CTMP. The overall highways implication is therefore 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*

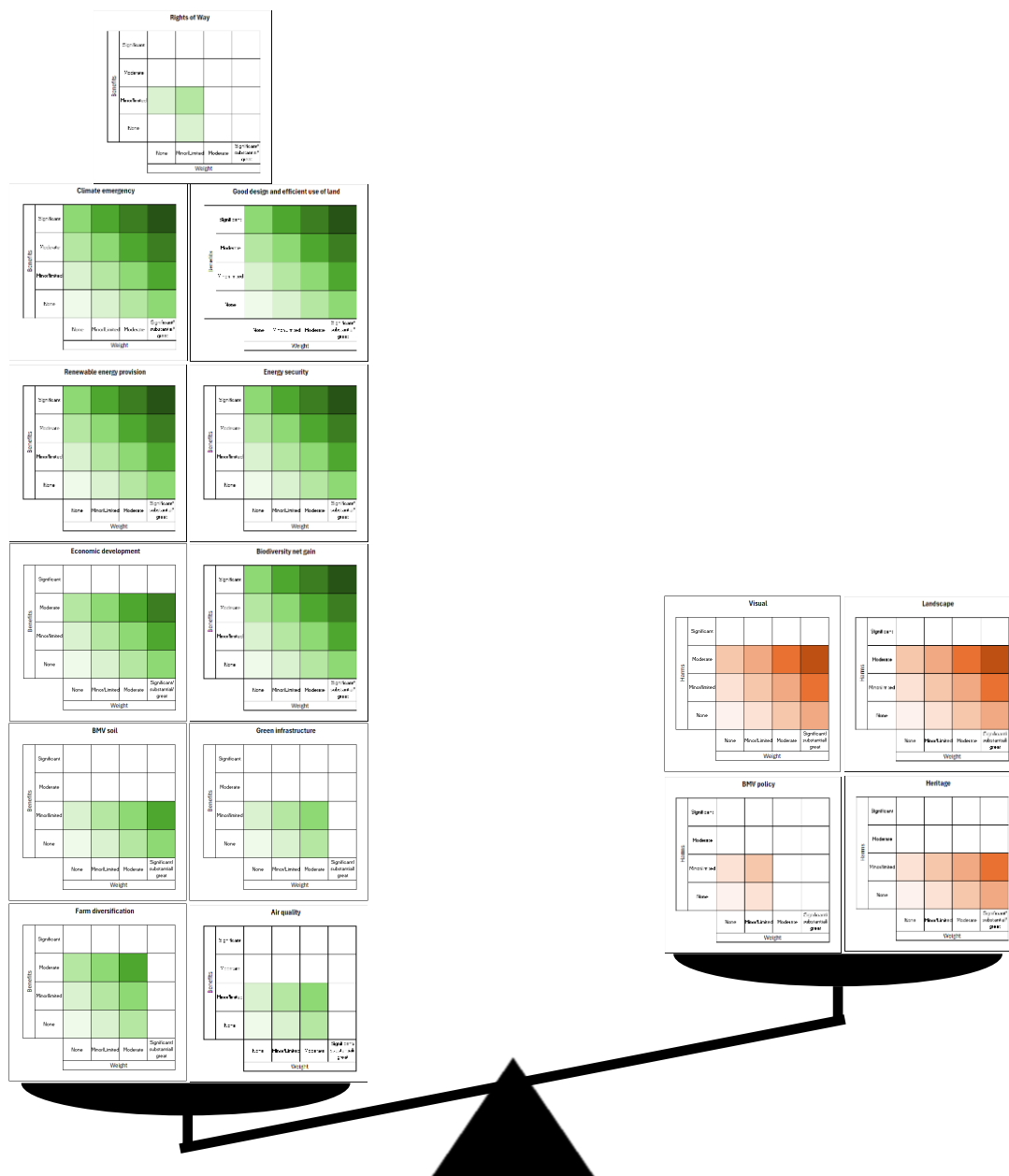
8.79 On this basis we are content that, on a very precautionary basis, there are very limited impact to flood and drainage, minor benefits if the site is actively managed for drainage (compared to its current unmanaged status) and overall the implications to flood and drainage are neutral.

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

Overall balance

8.80 The graphic below shows the overall balance of harms and benefits for this proposed development. The overall balance weighs clearly in favour of the grant of planning permission.

8.81 That conclusion is now reinforced by the August 2026 decision framework. S5(1)(a) says that energy infrastructure outside settlements should be approved unless its benefits are substantially outweighed by adverse effects. W3 requires substantial weight to the renewable-energy benefits, while N4 has been applied on the precautionary basis that the scheme is major development and its exceptional-circumstances/public-interest test is satisfied. The identified landscape and visual effects are moderate overall, localised, mitigated and reversible; they do not substantially outweigh the substantial renewable-energy, energy-security, net-zero and associated public benefits. The Environmental Statement supports that planning judgement but does not itself dictate the legal outcome.



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. Under W3(1)(a) substantial weight should be given to the renewable and low-carbon energy benefits for energy security, economic development and the transition to net zero, while W3(2) confirms that applicants should not be required to demonstrate overall need.
- 9.3 The application has been informed by an extensive suite of technical assessments, including an Environmental Statement because the site lies within the Cranborne Chase National Landscape, a Protected Landscape for the purposes of N4. 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 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. Those effects are localised, time-limited to the operational life of the development and reversible at decommissioning, and are moderated by landform, existing vegetation and the proposed landscape framework. On the precautionary assumption that the proposal is major development, the exceptional-circumstances and public-interest test in N4(2) is satisfied.
- 9.5 In contrast, the proposal delivers benefits which attract substantial policy weight. It will provide 3MW of renewable generation co-located by private wire with EV charging infrastructure on the Strategic Road Network, directly engaging S5, W3 and CC2. It will also deliver +143.69% in area habitat units and +84.12% in hedgerow units, together with landscape enhancement and a new permissive walking link between CHIC4 and CHIC5.
- 9.6 The proposal falls within S5(1)(a) as energy infrastructure outside a settlement. Having assessed the proposal against the development plan and the August 2026 national decision-making policies, including N4, the adverse effects do not substantially outweigh the benefits. The presumption in S3 and the specific decision rule in S5 therefore point clearly to approval.
- 9.7 Planning permission should therefore be granted without delay.