## [DATE] 2021

## BY EMAIL

Wiltshire Council County Hall Trowbridge Wiltshire BA14 8JN

For the attention of: Cllr Richard Gamble (Chairman)

Cllr Toby Sturgis (Brinkworth Division; de facto By Brook Division)

Cllr Christine Crisp (Calne Rural Division)

Cllr Ben Anderson (Corsham Without and Box Hill Division)

Cllr Howard Greenman (Kington Division)
Cllr Phil Alford (Melksham Without North)
Cllr Nick Holder (Melksham Without South)

Cllr Chuck Berry (Minety Division)

## Copy to:

James Gray MP (North Wiltshire Constituency) House of Commons London SW1A 0AA

Michelle Donelan MP (Chippenham Constituency) House of Commons London SW1A 0AA

Dear Sirs & Madam,

Urgent planning action for north/west Wiltshire: policy for large-scale solar and battery energy storage system (BESS) developments

We have observed large-scale solar farm and BESS development activity in the north/west part of Wiltshire increase by more than 100% since January 2019<sup>1</sup>, as shown on the map in the attached appendix.

The undersigned represent just a handful of parish councils who currently face the prospect of nearly 500 acres of agricultural land being converted into solar farm development. More

<sup>&</sup>lt;sup>1</sup> A solar farm is 'large-scale' for the purposes of this letter if it relates to installed capacity of 25 megawatts (MW) or more, on the basis that approximately 25 acres of land is required for every 5 MW of solar installation, according to the Solar Farm Association <a href="https://www.solar-trade.org.uk/solar-farms/">https://www.solar-trade.org.uk/solar-farms/</a> (i.e. 100 acres of land is required for a 25 MW capacity solar farm).

broadly in the north/west part of Wiltshire, more than 1,500 acres of land has recently been targeted<sup>2</sup>.

The attached map illustrates the 'pinch-point' created for local communities as developers target high voltage grid connection situated in the corridor between the Cotswold and North Wessex AONBs, to the north west and west of Wiltshire, for these large-scale projects.

In particular, a high concentration has already clustered around the Minety and Melksham sub-stations and their vicinity, with tracts of greenfield land either converted or at risk of being taken over in the process. These clusters are particularly acute at grid connection points corresponding to the Brinkworth/Minety and the Melksham Without North electoral divisions<sup>3</sup>.

We respectfully submit that, given the recent spate of these planning applications, Wiltshire council's apparent approach of focusing on applications individually risks 'missing the wood for the trees' and altering the fabric of significant parts of rural countryside outside AONBs for the medium, if not the long, term.

A number of the undersigned have already made written representations to Wiltshire council about the need to formulate a coherent policy on large-scale solar farms and BESS developments, especially in rural parts of the above-mentioned corridor to the north and west of the county.

A sensible framework is required to provide clarity for developers, local communities and, indeed, Wiltshire council itself, and help allocate the resources required to prepare, review and respond to these applications as efficiently, and equitably, as possible. Critically, this should involve Wiltshire council taking a broader view of the number of developments around grid connection points, as well as siting on greenfield land, and the resulting cumulative impact on the local area overall.

We believe this would be consistent with the Government's Guidance on Renewable and low carbon energy<sup>4</sup> which state:

"There are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to.

...

<sup>&</sup>lt;sup>2</sup> Corner Copse, Stanton Fitzwarren (238 acres: planning permission granted June 2020); Down Barn Farm, Cholderton (234 acres: planning permission granted April 2020); Minety (271 acres: planning application submitted April 2020); Melksham (200 acres: planning application submitted August 2020); Kemble Wick ([170] acres, proposal announced around October 2020); Forest Gate, east of Chippenham (194 acres: proposal announced around October 2020); and Leigh Delamere ([220] acres: proposal announced around October 2020). Source: Renewable Energy Planning Database (December 2020); published developer proposals.

<sup>&</sup>lt;sup>3</sup> https://services.wiltshire.gov.uk/northplanning-plottingsheets/Wiltshire%20Map%20showing%20new%20wards.pdf

 $<sup>{\</sup>color{red}^4} \underline{\text{https://www.gov.uk/guidance/renewable-and-low-carbon-energy\#solar-farms}}$ 

Identifying areas suitable for renewable energy in plans gives greater certainty as to where such development will be permitted. For example, where councils have identified suitable areas for large scale solar farms, they should not have to give permission outside those areas for speculative applications involving the same type of development when they judge the impact to be unacceptable." (para 5)

We understand, and appreciate, the national need for the delivery of sustainable renewable energy through multiple technologies, including solar and BESS. We note the leading contribution that Wiltshire already makes, relative to all other counties in the UK, as host to large-scale solar and BESS installations, according to the Government's Renewable Energy Planning Database (December 2020). We are equally aware that the recent flurry of large-scale solar and BESS planning applications in Wiltshire coincides with the introduction of lucrative government pricing support schemes for solar and BESS technology<sup>5</sup>.

This agglomeration of solar farms and related developments encroaches on viable farmland, animal habitat, rural community amenity and landscape character on the pretext of national need ('climate emergency' is often cited) and, moreover, convenient grid connection. And for what price, where the overall contribution of solar technology to the nation's electricity mix is only modest, in relative output terms<sup>6</sup>?

We are concerned that no consideration appears to be given to the broader impact on a particular area of multiple similar developments of this nature. By contrast, Wiltshire council's approach to new housing developments ensures these are appropriately sited in terms of need, proximity to work, schools and hospitals; yet nothing comparable exists for the siting of large-scale solar and BESS developments in terms of their cumulative impact on the local community and the surrounding area.

We call on you, as our elected Wiltshire councillors, to act quickly to correct this imbalance. The review of planning applications for large-scale solar farms and BESS should heed the Government guidance referred to above, and consider the cumulative effect of other developments in operation, under construction and in the pipeline, especially in areas close to grid connection points, and where siting is proposed on greenfield land.

Allocation - and prioritisation - by the council of suitable brownfield sites for renewable energy developments would also be a proportionate way for Wiltshire council to continue encouraging investment for delivering sustainable renewable energy.

Otherwise, judging by the spate of large-scale solar and BESS activity since January 2019, unless and until Wiltshire council takes concerted, rapid action, swathes of rural - sometimes ancient - Wiltshire countryside are at risk of being disrupted and converted for the medium, if not the long, term, especially where high voltage grid connection sits in the corridor between AONBs.

<sup>&</sup>lt;sup>5</sup> A recent example was the T-1 Capacity Market auction announced by National Grid ESO on 2 March 2021, in which developers (including Minety Battery Storage) won record pricing for their power <a href="https://www.current-news.co.uk/news/capacity-market-auction-clears-at-record-45-kw-year-given-tighter-generation">https://www.current-news.co.uk/news/capacity-market-auction-clears-at-record-45-kw-year-given-tighter-generation</a>

<sup>&</sup>lt;sup>6</sup> As at [XX] March 2021, solar contributed [4.4]% of the electricity mix https://www.mygridgb.co.uk/last-12-months/

## Yours faithfully,

For and on behalf of the Parish Councils of:

Grittleton Hankerton Kington Langley Minety Oaksey Yaton Keynell

Appendix to PC Open letter dated [XX] March 2021
Wiltshire: operational and proposed solar PpV and battery storage sites of 25MW+ Minety sub-station solar (JBM Solar) KEY Brown icons: BESS Purple icons: applications made since January 2019 Minety - Ravensroost Farm battery (Arlin. Melksham sub-station solar (JBM Solar) Melksham - Snarlton Farm battery (Imm Melksham Solar Farm (Foresight) Melksham sub-station west battery (Stat Melksham sub-station east battery (Stat\_ O Corner Copse Stanton Fitzwarren solar (\_ O Down Barn Farm solar (Lightsource BP) O Forest Gate solar (Eden Renewables) O Leigh Delamere solar (Eden Re O Kemble Solar Farm (Aura) O Charlton Park solar (unconfi O Wroughton Solar (Rockfire Capital) O Water Eaton Farm solar (Foresight) O Lynt Farm solar (Meag) Catsbrain Farm battery (Green Hedge

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