

## LONG SUTTON & WELL PARISH COUNCIL OBJECTION COMMENT TO HART DISTRICT COUNCIL:

Re: PLANNING APPLICATION 23/02591/FUL: SOLAR PHOTOVOLTAIC FARM INSTALLATION, LAND AT WHITE HILL, WELL, HOOK.

Long Sutton & Well Parish Council (LS&WPC) is a statutory consultee for the above planning application, the bulk of which sits within the boundary of the parish, and wishes to register a strong objection to the application.

In the current climate emergency, LS&WPC fully recognises the importance of renewable energy in the drive towards achieving net zero carbon, and is not opposed in principle to well-designed installations which are sensitive to their surroundings and setting, and which respect the local environment and the local community; in short, where any “harms” which may be attributable to the installation do not outweigh the benefits. But in the case of application 23/02591/FUL, LS&WPC believes that the harms associated with this proposal outweigh to a considerable degree any benefits which may be claimed for it.

### **BACKGROUND**

A substantially similar proposal for a solar farm around Long Sutton was first mooted in 2020, when the applicants, Fleet Solar, sought a screening decision from Hart DC on whether or not a separate Environmental Impact Assessment (EIA) would be required to supplement a full planning application. At the time LS&WPC (and many parishioners) argued that the potential impact of the proposed installation was such that an EIA should be required and Hart DC took a similar view. In a letter dated 25 January 2021 Hart said that

*“...it is anticipated that the development will result in significant environmental effects. Accordingly, the Local Planning Authority considers that based on the information provided, the proposed development is EIA development (positive screening opinion) due to the visual impacts on the landscape, impacts on ecology, potential impacts on flooding and heritage...”*

However, at the same time Fleet Solar also submitted an EIA screening request direct to the Secretary of State, who ruled that an EIA was not required, thus overriding Hart DC’s decision. Fleet Solar submitted a fresh EIA screening request to accompany this planning application in November 2023 and Hart this time determined that the application did not require an EIA but noted in a letter dated 18 January 2024 that:

*“...the proposal has the potential to affect the landscape as a result of cumulative impact of the proposal together with the existing Chosley Farm..., the impact on the visual amenity of the local communities in relation to PRoWs, namely footpath Long Sutton 1, 3 and 8 and the Long Sutton Conservation Area and South Warnborough Conservation Area.”*

LS&WPC considers that the present application addresses none of these issues adequately. While the current proposal has been “tweaked” from the original 2020 plans, it is substantially the same as before. In particular it continues to be less than a kilometre from the Chosley Farm site; it continues to surround on three sides much of the historic village of

Long Sutton, and it continues to occupy 260 acres of good quality arable agricultural land on undulating North Hampshire Downs landscape, criss-crossed by Public Rights of Way which are much-used by the local community and visiting walkers.

## **GOVERNMENT GUIDANCE**

LS&WPC is aware of the Government guidance on renewable energy installations in the National Planning Policy Framework and the associated Guidance.

In particular, LS&WPC draws attention to those elements of the National Planning Practice Guidance (NPPG) (2023) relating to Renewable and Low Carbon Energy, which it believes to be particularly relevant to this application, namely the following statements:

*“- the need for renewable or low carbon energy does not automatically override environmental protections;*

*- cumulative impacts require particular attention, especially the increasing impact that large scale solar farms can have on landscape and local amenity as the number of solar arrays in an area increases;*

*- great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;*

*- protecting local amenity is an important consideration which should be given proper weight in planning decisions.”*

The Guidance advises local planning authorities to take account of the potential impacts on the local environment and the views of local communities in considering which areas are suitable. It also guides development away from the "best and most versatile" agricultural land.

## **HART LOCAL PLAN**

Hart's approved Local Plan, policy NBE 10 (Renewable and Low Carbon Energy) states that all such applications are subject to an assessment of, amongst other things:

*“-the significance or special interest of heritage assets*

*-the impact on high grade agricultural land*

*-the impact on residential amenity, including...noise...and visual amenity;*

*-and the degree to which the developer has demonstrated any wider environmental, economic and social benefits of a scheme as well as how any adverse impacts have been minimised.”*

The Local Plan document goes on to say (paragraph 309):

*“When assessing the impacts of a proposal for a renewable energy scheme we will consider the cumulative landscape and visual impacts of the development. Cumulative visual impacts*

*may arise where two or more of the same type of renewable energy development will be visible from the same point or will be visible shortly after each other along the same journey.”*

#### **PLANNING APPLICATION 23/02591/FUL**

LS&WPC considers that this application, 23/02591/FUL, when assessed against the above national guidance and Local Plan policies, should be refused for the following reasons.

- 1) Proximity to the Chosley Farm site: if this application were to be approved it would give rise to a significant cumulative impact and concentration of intensive solar farm arrays covering some 500 acres in this relatively small rural area, thus seriously damaging the landscape and its rural character.
- 2) The landscape is attractive rolling downland, which the application itself acknowledges is “a pleasing rural landscape with a level of tranquillity...looking south towards Long Sutton the impression of calm undisrupted rural landscape is dominating”. This will undoubtedly be seriously harmed by an installation of solar arrays spread across 9 fields, including some 30 large transformers (2.6m high x 3.4m long), all surrounded by continuous 2.2m high fencing.
- 3) Long Sutton (and Well) are ancient settlements and it is therefore not surprising that it has a significant concentration of listed buildings (32 in total) and 2 conservation areas. A number of these buildings and areas will be visible from, and have visibility of the installation, thus impacting on their historic character and setting. The application acknowledges this, but states only that these impacts “will be the subject of further assessment”. LS&WPC draws particular attention to the egregious impact of the proposed installation on Andrews Farm, a Grade 2 listed building, which would be almost completely surrounded by solar arrays. LS&WPC agrees with the conclusions of expert consultants HCUK’s report (commissioned by the owner of Andrews Farm), both in respect of the impact of the scheme on Andrews Farm, and on other heritage assets in the parish.
- 4) The loss of 260 acres of good quality arable agricultural land, 90% of which is classed as Grade 2 or 3a, deemed “best and most versatile” land. At the present time, when UK food security is very much a matter of concern, such a move seems ill-advised and in the view of LS&WPC outweighs any claimed benefits of renewable energy generation. Considering that the proposed solar farm would be in place for at least 40 years, the applicant’s conclusion (in their Agricultural Land Classification and Framework Soil Management Plan) that “reversible development of a solar farm on agricultural land quality would not significantly harm national agricultural interests” seems surprising, particularly given the cumulative impact of solar farms in this rural area.
- 5) In this regard, LS&WPC notes with concern that the installation would be implemented by a Special Purpose Vehicle, which would potentially enable liabilities for land remediation and decommissioning to be evaded (as this parish is currently

experiencing with unfulfilled landscape obligations at Wingate Meadow following the collapse of the developer), and draws no reassurance from the bald statement in the applicant's Design, Accessibility & Planning Appraisal document that "a decommissioning Environmental Management Plan...would be prepared to ensure the process is undertaken effectively and in accordance with the relevant policy and recommended practices at the time".

- 6) As Hart's screening decision letter of 18 January 2024 notes, 3 x PRow's will be affected by the proposed installation. These PRow's have important amenity value for local residents and visiting walkers and ramblers, which enable them to enjoy views of the "pleasing rural landscape with a level of tranquillity" and the "calm undisrupted rural landscape" acknowledged by the applicants themselves. These benefits will be significantly diminished if substantial sections of the PRow's are flanked by high fencing, bulky container-sized transformers and noise-emitting equipment.
- 7) The proposed development area provides habitat for numerous species, yet the application fails to provide any information on how the scheme will avoid a net loss of diversity, and as such does not comply with national planning policy on biodiversity. LS&WPC agrees with the report by expert consultants ACJEcology, commissioned by the Long Sutton Solar Farm Action Group, which recommends that the scheme should be refused on these grounds alone.

In LS&WPC's view, all of the above harms significantly outweigh any claimed benefits of the scheme; this is compounded by its adjacency to the Chosley Farm site and the fact that, if approved, the scheme would have an expected lifespan of at least 40 years, which can hardly be described as "temporary": it will impact the landscape, the local environment, and the rural character of the area for a generation.

In conclusion LS&WPC would make 2 final points:

- 1) It does not follow that the benefits of renewable energy generation should always and automatically trump any environmental or community concerns. While we of course recognise that every application has its own characteristics, we note that in 2 recent planning appeals (refs. S62A/2022/0011 (11 May 2023) and APP/F1040/W/22/3313316 (21 July 2023)) the Inspector dismissed the appeal in the first case predominantly on grounds of loss of best and most versatile agricultural land for a period of 40 years; and in the second case on the harms to "character and appearance, landscape and visual matters, the settings of designated heritage assets...loss of BMVAL, highway safety, biodiversity and noise". All of these considerations apply to the Fleet Solar Farm application.
- 2) As a parish council when commenting on planning applications, LS&WPC always strives to take a balanced view as between the merits of the individual application and the wider impact of the application on the local environment and the local community – we do not oppose everything as a matter of course - and we have applied the same approach in arriving at our views on this application.

Notwithstanding, we also need to take into account the views of our local community – as indeed Government planning guidance advises planning authorities to take account of the views of local communities in considering proposals for renewable energy installations. In this regard it is important to note that not only LS&WPC objects to this application but so too do the adjoining parish councils of South Warnborough and Odiham. Moreover, of the 193 comments on this application from individuals recorded on the planning portal, 190 object to it, 2 support it and 1 is neutral.

Taking all of the above considerations in to account LS&WPC objects to this application and urges Hart DC to refuse it.