



Long Sutton Village Hall, The Street, Long Sutton, Hook, Hampshire RG29 1SS

16 November 2020

Mr Graham Speller
Planning Officer, Hart District Council
Graham.speller@hart.gov.uk

Dear Mr Speller

Ref: 20/02632/EIA | Request for screening opinion for a proposed ground mounted solar farm with associated ancillary works and buildings (up to 105.11 hectares) | Ford Farm Ford Lane Upton Grey Basingstoke Hampshire RG25 2RP

The Town and Country Planning Environmental Impact Assessment) Regulations 2017 (“the EIAR”)

On behalf of Long Sutton & Well Parish Council I am writing to request that the District Council issues a positive screening opinion i.e. that the proposal would constitute EIA development (within the meaning of Regn.2(1)), and, that an Environmental Statement is required for the purposes of Regn.5(2)(b) of the EIAR.

Due to the late notification of this screening request to our Parish Council (despite the fact that we are a formal consultee,) we have expended a lot of effort on the preparation of this letter within a very short period of time due to the potential serious environmental impacts of the proposed development on this parish. We are treating this as a serious proposal but our comments at this stage are limited to the matters set out below. However, that should not mean that the District Council should regard our comments with any lesser weight.

Having had the benefit both of urgent advice from senior planning counsel, Mr John Pugh-Smith of 39 Essex Chambers, as well as swift consultation with all Parish Councillors, I have been asked to draw the following matters to your attention justifying the conclusion drawn at the end of this letter.

(1) Although this is a proposal for a significant development for the purposes of Schedule 2, para. 3(a) (given that the specified threshold is set as low as 0.5. ha) it is surprising and reflective of the tokenist approach taken to date that:

(i) there have been no informal discussions with this Parish Council at all, and

(ii) no formal pre-application has been made to the District Council despite at least one other known proposal within the area only a mile or so away at Chosley Farm, Bidden Road, North Warnborough RG29 1BW (see further below at sub-paragraphs 10 & 11)

(2) Despite the fact that the Screening Request is prepared by one Tom Sylger Jones MRTPI¹, seemingly a renewable energy professional, its contents are so scant in the information provided that it is questionable whether it adequately meets the collective requirements of Regns. 6(2), 6(4) and Schedule 3 of the EIAR.

(3) Further, the applicant Fleet Solar Limited, has no “track record” in the delivery of renewable energy projects; from a simple company search it was only incorporated on 17th December 2019² and has yet to file any accounts, so no reassurance can be gained as to whether this is an entirely speculative proposal or not.

(4) At this time no consultation responses appear from either the District Council’s Heritage Officer or Historic England, although the proposed development will have an impact on the setting of the Long Sutton Conservation Area ³, as it will surround the village on three sides, and on several listed buildings within it.

(5) The Parish Council also understands that no consultation has yet taken place with the Ministry of Defence over the potential impacts of this proposal on operations from RAF Odiham, either in its own right or cumulatively with at least another known proposal (see further below at sub-paragraphs 10 & 11).

¹ <https://uk.linkedin.com/in/tom-sylger-jones-mrtpi-85b87>

² <https://find-and-update.company-information.service.gov.uk/company/12368193>

³ Omitted from specific reference

(6) While it is acknowledged that a full range of technical reports will be essential to the determination of any specific planning application the following Schedule 3 criteria are particularly highlighted as, cumulatively, highlighting the need for formal EIA through the preparation of an Environmental Statement

(7) *The Natural Environment*: Applying the selection criteria set out in Schedule 3 to the EIAR both the District Council's Ecology Officer and Natural England have raised particular matters affecting ecology and visual effects. They have highlighted, in the former respect, that the location of the proposed development is within/partly within the Greywell Tunnel (Basingstoke Canal) SSSI⁴ which gives shelter to the largest population of bats (a European Protected Species) of any known site within Britain and, in the latter, on the South Downs National Park, both of which aspects require further assessment

(8) . Given the foregoing, combined with the paucity of information provided by the applicant, both the District Council and the current state of UK and EU law require this exercise to be undertaken through formal EIA processes

(9) *Cumulative impacts*: This criterion has not been considered by the applicant.

(10) However, it is highly relevant given the District Council's knowledge of and determination, both by way of a pre-application submission (20/00180/PREAPP) and a negative screening opinion (20/1658/EIA), of another solar proposal at Chosley Farm, Bidden Road, North Warnborough RG29 1BW during Summer 2020.

(11) As the Chosley Farm proposal is approximately one mile from the Ford Farm proposal, and, viewable from each other other's outer points, and, raise the same or substantially similar considerations to those above, this is a further reason why a formal EIA is required by way of an Environmental Statement.

Given the foregoing, there are clear reasons why it would be both legally appropriate as well as sound decision-making for this proposal to be the subject of a formal EIA.

⁴ Omitted from specific reference in the Screening Request

Accordingly, the District Council is requested to issue an appropriately worded decision letter to that effect.

Finally, as it is the Parish Council's understanding that the application is solely a Screening Request under Regn. 6(1) and not combined with a Scoping Request for the purposes of Regn. 15(5) of the EIAR, the District Council is under no requirement to provide such details at this time. However, the Parish Council wishes to be kept informed and its views formally sought on the scope of the requested Environmental Statement.

Yours

Susan Richardson
Clerk, RFO Long Sutton & Well Parish Council