

Katherine Fitzherbert-Green
Planning and Development
Basingstoke and Deane Borough Council
Civic Offices
London Road
Basingstoke
RG21 4AH

January 2021

Dear Ms Fitzherbert-Green

OBJECTION TO PLANNING APPLICATION Ref: 20/03403/FUL

Installation of renewable led energy generating station, comprising ground-mounted photovoltaic solar arrays, battery-based electricity storage containers together with substation, inverter/transformer stations, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure, landscaping biodiversity enhancements including a Forest School, associated car parking and Nature Area | Site At Minchens Lane Bramley Hampshire

I wish to register my objection to this planning application in the strongest possible terms.

Whilst I acknowledge the climate challenges facing our planet and the need to increase the sustainability of our energy production in Hampshire and across the UK this application for a huge solar farm will engulf the area and cause demonstrable harm to our countryside, heritage assets and agriculture. It proposes very little by the way of community benefit to mitigate this harm.

I therefore **OBJECT** for the following reasons:

1 Loss of good quality agricultural land.

I refer you to the Government Written Ministerial Statement dated 25th March 2015 which says in the light of continuing concerns about the unjustified use of high quality agricultural land, "... we want it to be clear that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence."

Over half the site (52.5%) is categorised as Best Most Versatile Agricultural Land (BMV). In fact none of the land is rated as grade 4 (poor quality) or grade 5 (very poor quality).

The Bramley area is mainly grade 3 so to lose 11.7ha of grade 2 soil is all the more important. Losing good to very good quality agricultural land is not the most efficient use of this site and wholly contrary to paragraph 123c of the NPPF. Paragraph 5.10.8 of the Overarching National Policy Statement for Energy (EN-1), so readily quoted in the planning application, says applicants should "preferably use land in areas of poorer quality (grades 3b, 4 and 5)".

Paragraph 170 of the NPPF states "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality". This 200 acre development is neither necessary nor is it situated on poorer quality land.

I also ask the council to check the **field classification** submitted by the applicant and commission an independent survey. It is not uncommon for field one to have more than one crop in a year. Winter wheat and turnips have been planted in this field in the same year showing its value as an agricultural use, which places doubt over the credibility of the applicant's supporting agricultural statement.

2 Detrimental change to the character of open fields and farmland

North of the Sherfield Road/Silchester Road the character of this area is one of open fields dotted with individual buildings and tiny villages. The solar farm will dominate the area and change the character of this part of the countryside.

I have no objection to small sensitively placed solar farms potted around the area that are occasionally glimpsed. However this enormous installation will blight this highly coveted countryside. This is contrary to Policy EP4 of the Basingstoke & Deane Borough Council Local Plan (BDLP).

3 Close the gap between Bramley and Silchester Villages

It is important our villages remain separate and retain their own identities. The solar farm will bridge most of the gap between Bramley and Silchester villages and by association, lose part of their separate identities. The development is contrary to Policy EM2 of BDLP and by losing its rural character setting, Policies BSA4 and D1 of Bramley Local Plan.

4 Destroy the Silchester Trail and Brenda Parker Way

The Silchester Trail (which was funded by Heritage Lottery Fund in 2010) and Brenda Parker Way are well used and loved trails that cut right through the proposed solar farm. Whilst these public rights of way are being retained their enjoyment will be ruined by this enormous installation. The high security 6.5ft mesh fencing, CCTV, 11ft high transformers, battery containers that are almost ten feet high and 40ft long (and look like shipping containers) and other supporting infrastructure are eyesores and blight the public pathways. A bit of planting that will take 15 years to establish is insufficient mitigation and in any event would destroy the openness of some of these pathways. I also note the pathways are not accurately recorded in the planning application. They are plotted as straight routes but they meander and I trust the council will insist this is corrected. These trails are very popular and heavily used by residents and visitors from Silchester to the north down to Bramley in the south for the occupiers of St James Park Housing development.

The high security fences and planting (when established) will enclose parts of the routes through the solar farm and turn them into corridors. This is harmful to the visual amenity of these treasure walks.

The applicant is trying to mislead the council by carefully selecting summer views in the supporting information. However in the autumn and winter when most of the surrounding trees have no leaves the solar farm will be more obvious and harmful.

Whilst the applicant concludes there will be “very little glare” there will still be glare, particularly when the panels are wet, drawing the attention to walkers when navigating through the pathways.

Health and well-being are particularly important for our community during this difficult period and landing these alien structures right next to our walkways and many homes is a backward step.

The threat to Silchester Trail and Brenda Parker Way is real. In the attached appendix No 3 is a picture of a public footpath which traverses two sets of panels (there are other panels on the other side of this hedge) at Goodworth Clatford. Since the Solar Farm was installed the path no

longer passes an open landscape, the joy is lost and the path has fallen into disuse and no longer a community asset! This is likely to happen to our walkways.

The development is clearly contrary to Policy CN8 (b) of the BDLP which seeks to improve the quality and capacity of facilities valued by the community, Policy EM1 and EM10 which seeks to protect the character and visual quality of an area, Policies BSA4 and D1 of the Bramley Neighbourhood Development Plan and paragraph 170 of the NPPF which seeks to enhance the natural and local environment including valued landscapes and soils and “the intrinsic character and beauty of the countryside”. Para 9.5.9 of the UK Solar PV Strategy states “Support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity, and provide opportunities for local communities to influence decisions that affect them”. The development does not meet these tests nor has there been proper engagement to meet the objections raised by the local community.

The applicant cites the Overarching National Policy Statement for Energy (EN-1) however this advice is aimed at Nationally Significant Infrastructure Projects and in any event paragraph 5.9.7 rightly says the impact “on views and visual amenity” and “local amenity, and nature conservation” needs to be taken into account. Paragraph 5.9.14 says outside nationally designated areas, “there are local landscapes that may be highly valued locally”. As a local resident I highly value this local landscape.

5 Impact on the setting of the Pound Conservation Area

The Pound Conservation Area is only 100 yards away and faces onto the elevated ground of the Solar Farm site. Large parts of the conservation area, which is populated with listed buildings, will be afforded long views of the backs of these panels stretching south west to south east. The panels will be highly visible, particularly during the winter where the tree and hedge coverings offer little cover and will be seriously detrimental the setting of the Conservation Area. The Pound Conservation Area covers a small area and should not be dominated by these structures. As such the structures will fail to preserve or enhance the conservation area which is contrary to paragraph 193 of the NPPF.

As such the proposal is contrary to Policy EM1 of the BDLP which protects the setting of settlements including views to, across, within and out of settlements and Policy EM11 which protect the historic environment.

6 Impact on setting of listed buildings

There are numerous cherished listed buildings within close proximity to the Solar Farm. These include Lower Farm house and its associated Barns (many of these listed buildings were originally part of Stratfield Saye estate and date back not only to the original Duke of Wellington (1815), but also way back to William Pitt (1559-1636). Old Meadows is also listed and most of these heritage assets are set in large gardens that sweep down to the boundary of the solar farm.

The setting of these buildings and their curtilages will be seriously harmed by line upon line of solar panels that rise up along the slope of Field 1. This is contrary to Policy EM11 of the BDLP.

7 Impact on setting of nearby housing

The application site is surrounded by many houses. Brookside Grange on Bramley Road is one example of a home that will be surrounded on two sides with solar panels. The entire western edge of the dwelling curtilage is adjacent to solar panels in Field One and the entire southern

edge by panels in Field Two. Field One is on a higher level than the garden edge of this dwelling and with the land in Field Two rising to the south, this family home will be dominated by a sea of panels. Whilst generally there is no right to a private view in planning, where the scale of the development is so big, as is the case with this 200 acre proposal, the overall impact on the attractiveness of the area for the occupiers of these homes and the general public is a material planning consideration. To have adjacent fields filled with hundreds of solar panels will dominate their environment and render the homes unattractive places to live.

St James Park overlooks the solar farm on the south east. Many of the homes look across Field 5 and 6 and notwithstanding the attempt to set the panels away from this development, they will be visible particularly during winter months.

The proposal is therefore contrary to Policy EM1 of the BDLP which protects the setting of settlements including views to, across, within and out of settlements. It is also contrary to Policy BSA4 and D1 of Bramley Neighbourhood Development Plan.

8 Increased risk of flooding

There is a long history of flooding around these fields. In particular field 2 and the Bramley Road floods frequently and becomes impassable. It is undeniable that structures such as the battery containers, concrete supports, foundations for fences and other impervious equipment will result in less land that can take up excess water. The existing fields are regularly ploughed and this helps let rainwater soak down through the surface. This flooding mitigation will be lost if covered in panels and the areas around the solar panels are likely to become trodden down from being used for maintenance access (or by sheep grazing) and are less likely to soak up water. The panels will deviate heavy downpours and result in a greater risk of flooding.

Any increase in the risk of flooding is unacceptable given the current problems in the area and contrary to Policy EM7 of the BDLP and Policies D1 and RE1 of the Bramley Neighbourhood Development Plan.

9 Damage to our Cultural Heritage

The solar panels will cover part of a rich archaeological heritage; not just Roman Silchester but its Iron Age predecessor. Three heritage assets are known to exist within the site,

- Possible Roman Villa (HA1) located in Field 1 is considered to be of medium importance because of its likely associations with the Roman town of Silchester (itself a Scheduled Monument);
- An enclosure (HA2) located in Field 6 which is of an unknown date and function and its importance is unknown; and
- An enclosure (HA3) located in Bramley Frith Wood which may also extend into Field 2.

The applicant's claims that there is no additional potential within the grounds is pure speculation and inconsistent given the existence of archaeological remains on the site and their abundance in surrounding areas, which have yielded many Roman and Iron Age remains, even a Bronze Age site.

It is perplexing and disappointing to learn that Reading University and Professor Fulford should be so heedless of the site. The assertion that the site can be revisited when the solar installation is removed in 30 years time gives no assurances that this will be the case. The country will still

need energy, quite possibly on a larger scale. The most likely scenario will be a suggestion that the site be re-equipped with the latest solar equipment, since that would not create fresh disruption elsewhere. Another likely scenario, is that brownfield site status will then be claimed with a view to residential development. Access to our history will disappear and not be safeguarded.

The local community and through the Calleva Foundation, has dedicated considerable resources to support the research into Roman and Iron Age Britain at the Silchester heritage site and its surrounding areas over the last 15 years. This has been done by private funding and needs to continue. Silchester is an important centre and the continuation of this research is important. It needs to draw on all possible local sites going forward.

As to the views of Reading University, their advice must be seen in the context they have been promised 'a donation to the Reading University Archaeological Department'. And for reasons cited elsewhere in this letter the donation cannot be given any weight in considering this application.

10 Construction via Minchens lane over 7 months

Minchens Lane is very narrow with single lanes to the north and pinch points to the south including a chicane. Some parts are unable to take two way traffic. Fourteen trips a day generated by 16.5m articulated lorries plus ancillary vehicle movement for the workforce over a seven month period is likely to damage the local roads and increase the risk of accidents. The lorries also have to cross Oliver's Lane connecting Fields 3 and 4.

The Transport Assessment is wholly inadequate. It ignores the fact Minchens Lane becomes a single track where it runs into The Street with no room for two vehicles to pass. HGVs approaching from the west have to swing into the southbound traffic in Minchens Lane and wait on the The Street for any vehicles to exit before making their turn. Minchens Lane is not only a very busy road it is crossed by children and frail elderly adults on a regular basis to access the Doctors Surgery. There are also turnings into Clift Meadows games area and St James Park Housing development. There is a curve on the road blind spotting approaching traffic which makes it more dangerous. The chicane was introduced to slow down speeding cars on this stretch of Minchens Lane. This will have to be modified or removed to let the articulated lorries pass.

No risk assessment has been made to assess the impact on the safety of children and the elderly in particular. The access is contrary to policy CN9 of the BDLP and the council should ensure such an assessment is carried out and a construction management plan secured.

11 Insufficient public benefits/mitigation to over the harm caused

The applicant puts forward a list of initiatives in support of the application but most of these are without any substance. No mention is made of the fact these vast open fields are used by herds of deer. Nor is there any mention of the use of these fields by Red Kites. Kites are protected under the Wildlife and Countryside Act 1981 and the loss of such a large area of their natural hunting ground will impact on their numbers. The biodiversity improvements, most of which are in connection with attempts to green over the high perimeter fencing, does not mitigate the harm the solar farm will cause to the local deer and Kite population. This is contrary to the aims set out in Policy EM4 and EM8 of the BDLP.

For example;

- There are no details about the “potential” Forest School and nature reserve. Who would run and pay for it? In any event there is already a 'Forest School' at Bramley Frith called the Muddy Puddle Club! There is no need for a second Forest School so close to this club which is well established and offers a good learning programme.
- Sheep grazing is suggested but there are no details or guarantees this activity would happen and overgrazing can lead to soil erosion. Using good quality agricultural land for sheep grazing is a waste. More details should be provided over how the grass will be cut and maintained rather than relying on sheep.
- Whilst bat and dormouse boxes are welcomed we would expect the current agricultural activity to incorporate these as a matter of good practice.
- The proposed Bramley Green Corridor tree screening will not work – you can see between trees, particularly during the autumn and winter months.
- There are no details for the three pronged bridge link. This needs planning permission and there is no guarantee it will be acceptable.
- The proposal not to screen pathways through field 2 merely helps maximise the number of solar panels in this field.
- The interpretation boards will need advertisement consent and will only add visual clutter to the area.
- The suggested solar panels on Silchester Primary School are likely to need planning permission, the roofs may not take the loading and I am not aware the school has agreed to this.
- An unspecified sum of money is offered as a donation to the University Archaeological Department. The NPPF advises such payments have to be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. This financial bribe for the UAD does not meet those tests and cannot be given any weight in considering this application.

12 Risk of the farm land not being reinstated

Despite early assurances by the applicant that reinstatement would occur and an insurance policy or bond would be purchased to ensure the reinstatement of the land, the applicant has become silent on these obligations. The assumption is that they no longer intend for this to be a temporary development, but instead a permanent development, which also opens up the possibility of the site being classed as brownfield and eventually developed for housing.

The reinstatement of the land will be a costly exercise and an enormous risk should the company go bust. It is imperative the works to remove all the equipment is costed and put into a bond so the council can ensure the land is reinstated should the company go into liquidation or not have the finances after the planning consent expires. Without this the removal of the equipment will be unenforceable.

Overall the serious harm caused by this unwelcome development outweighs any benefits the Solar Farm does or can possibly offer and is contrary to Policy EM8 of the BDLP. Hampshire has more Solar Farms than al

l the other 16 counties in the South of England, with the only exceptions being Devon & Cornwall (see appendix 1 and 2). Hampshire is way ahead of many nearby counties such as Berkshire, East Sussex, the Isle of White or Surrey, which each have less than one tenth that of Hampshire.

Finally the majority of local residents were not consulted by the applicant before the application was submitted. For example there was no consultation with residents in the Pound Conservation Area or Silchester Parish Council.

For all the above reasons this enormous ill-conceived development is wholly unacceptable and I urge the Council to refuse planning permission.

Yours sincerely,

Name:

Address:

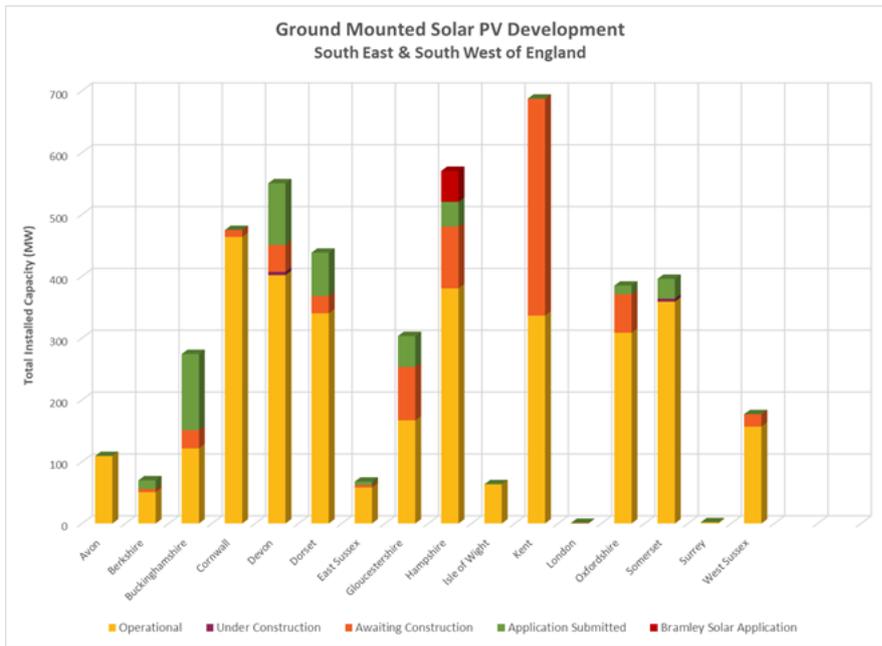
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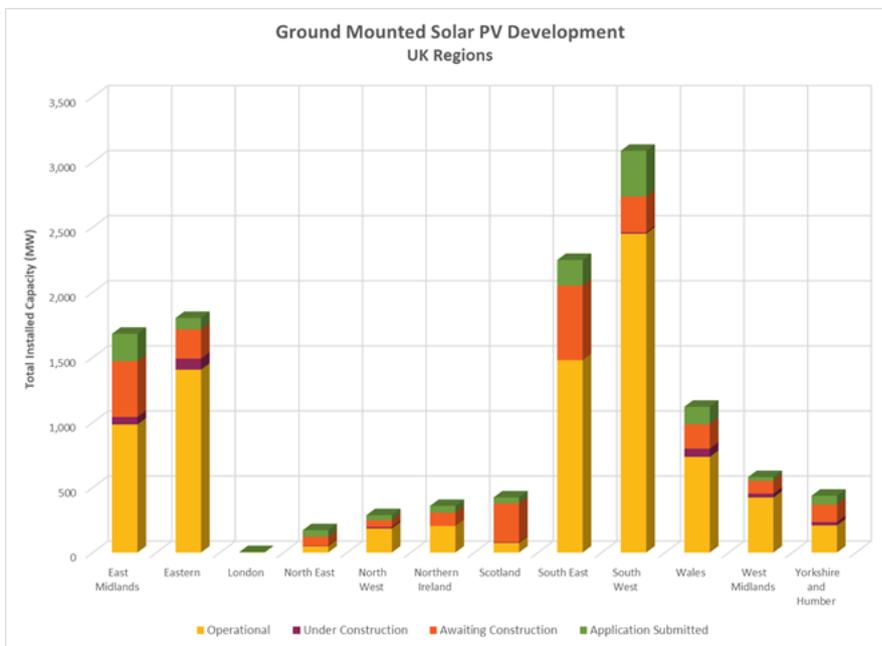
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Appendix one: Ground Mounted Solar PV Development in the South East & South West of England



Appendix Two – Ground Mounted Solar PV Development in the UK



Appendix Three - Goodworth Clatford – walkway lost after the Solar Farm was built

