

Robert Green
Senior Planning Officer
Development Management
Winchester City Council
City Offices
Colebrook Street
Winchester
SO23 9LJ



13th October 2021

Dear Mr Green

21/01391/FUL: Solar Farm and Associated Development

The Bishop's Waltham Society apologises for the delay in writing to you about this planning application after the Expiry Date, but we have been assured in the past that all comments will be taken into consideration, if received before Decision Date. We have considered the proposals carefully and engaged a variety of residents of Bishop's Waltham in conversation.

If one mentions that there are plans to build a solar farm on the outskirts of the town, there is normally a welcoming response to the idea - after all, most of us are pleased that someone else is doing something about climate change. And solar farms are widely seen as a "good thing".

However if one goes on to say that greenfield sites on agricultural land are not amongst the government's priorities in its intention to have net zero carbon emissions by 2050, there is usually a pause for thought and further enquiry.

If one then adds the fact that the government is prioritising the use of an estimated 250,000 hectares of industrial and commercial roofing for solar panels instead of using the countryside¹; that the 84 acres of solar arrays involved in this plan join up with an existing solar farm to form a site spread over more than 150 acres of local countryside; that these arrays run right along the banks of two upper parts of the River Hamble, as it flows from the Moors Site of Special Scientific Interest, for about a mile; and that it will surround part of a public right of way/footpath with 20-25 rows of black panels to left and right for about a half a mile on both sides and the whole will be surrounded by a 2 metre high fence with about 62 CCTV cameras keeping permanent watch... At which point attitudes frequently change.

As a Society we are aware that these points, in and of themselves, are not necessarily material planning considerations. But we believe that every now and then it is important to relay to our local planning authority the public response to the proposals they have to consider.

We are struck by the consistency of the concerns and objections raised by other bodies which have a close knowledge and understanding of the potential impact of this proposed

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/302049/uk_solar_pv_strategy_part_2.pdf "we want to move the emphasis for growth away from large solar farms and instead focus on opening up the solar market for the UK's estimated 250,000 hectares of south facing commercial rooftops"

development, including Bishop's Waltham Parish Council, Shedfield Parish Council, the Bishop's Waltham Museum Trust, CPRE Hampshire and the South Downs National Parks Authority itself.

This level of opposition is in marked contrast to that made against the two local Solar Farms approved in 2015, (15/00082/FUL and 15/00786/FUL), now some seven years ago. The Bishop's Waltham Society did not comment on either at the time.

So now to some material considerations that we wish to raise about this application:

1. Landscape character

CPRE: The Society notes that CPRE Hampshire have conducted a careful 16-page study of the landscape south west of the town, which will be most immediately impacted by the development. It concludes that it should be considered as "Valued Landscape" within the context of the National Planning Policy Framework (NPPF) paragraph 170 (a). This proposes that: *"Planning policies and decisions should contribute to and enhance the natural and local environment by ... protecting and enhancing valued landscapes, sites of geological value and soils (in a manner commensurate with their statutory status or identified quality)"*.

As CPRE Hampshire says: "The Area lies wholly within HICA County Character Area 2E: Forest of Bere West and WDLCA: Durley Claylands, exhibiting a varied landscape of arable and pasture agriculture, copses (including ancient woodland), with a strong hedgerow and woodland network. To the southern part is the River Hamble with associated wetland habitat, water meadows and locks, and Grade 2 listed water mill at Chase Mill. There are long views from elevated positions across farmland, with shorter views enclosed by woodland and strong hedgerow boundaries. Contained are several scattered farms and associated dwellings. These features are key characteristics of the Durley Claylands LCA and Lowland mosaic Small Scale Landscape Type within the Forest of Bere CCA."

CPRE reinforce the significance of this "attractive and distinctive landscape with good quality views over attractive countryside from many points" by pointing to "the intimate and attractive riverscape of the River Hamble and its associated wetland, the lack of development, general sense of tranquillity and dark night skies... the high quality public experience of this landscape from public rights of way [including the Kings Way] and the contribution this landscape makes to the landscape setting of Bishop's Waltham and views from the built up area."

South Downs National Park Authority (SDNPA) - This accords well with the views expressed by the SDNPA:

"This site, together with other open and undeveloped land within the area, positively contributes to the rural setting of the South Downs National Park and its scenic quality. Furthermore, the site also contributes to a wider green infrastructure network and wildlife corridors, of particular importance considering the close distance to the boundary of the National Park. The site is approximately 700 metres away from the South Downs National Park at its nearest point."

And that:

"Associated development such as fencing, tracks, outbuildings, tower, CCTV equipment and any lighting would be detrimental to the visual and perceptual qualities of the area as well as the photovoltaic panels."

Which, amongst other considerations, led the SDNPA to conclude that "It is considered, given the high rural character of the site in the area immediately south of the [SDNP] boundary, that the development of a solar farm, of this scale, would erode the setting of the National Park."

We believe it is pertinent therefore to look, retrospectively, at the arguments put forward in the Committee Report for the Forest Farm solar farm (15/00082/FUL) and the Officer's Report for the Winchester Road solar farm (15/00786/FUL). Both these applications were, of course, approved.

We note that for the approximately 16 acre site in 15/00082/FUL (to the east of the B2177), WCC felt that there were no landscape concerns because "it is relatively small scale" and "would be almost entirely concealed from public view by virtue of the low lying nature of the landscape". Neither of these conditions apply to the current application which seeks to add a further 84 acres of photovoltaic panels (on an undulating site) to a 69 acre site and surround a public right of way in the process.

For that 69 acre site (15/00786/FUL) to the west of the B2177, WCC argued that while "the insertion of a large solar panel development would represent a large magnitude of change to the landscape character of the site" in this particular instance "the development would be substantially screened from view by the existing and proposed vegetation". However, this new application will, as we have said, create a 150+ acre area of panels - one of the largest solar panel sites in Hampshire - so this does indeed represent "**a large magnitude of change in the landscape character**" of the area.

We note that for 15/00786/FUL WCC further argued that "although there would fundamentally be a very obvious change to the landscape character of the site, it would be within a contained location, whereby the scale of the proposal and its effects on the landscape character of the wider area would be highly limited." Again this argument does not hold up for the new application 15/00786/FUL precisely because, taken with the existing solar farm to its east, it would create over 150 acres of contiguous solar farm - something that will indeed represent "**a very obvious change to the landscape character of the site**".

As the SDNPA said, in reference to 15/00786/FUL, "it is important to retain a transition rural landscape to and from the protected landscape, rather than a fixed boundary along the SDNP." The combined solar farms would occupy the landscape from the Botley Road in the west to within a few hundred metres of the National Park's boundary in the east. And it would do so in a way that would create a large scale change to that landscape.

The Bishop's Waltham Society therefore objects to this application because it:

- Is set in an attractive and distinctive open landscape
- Utterly spoils the "intimate and attractive riverscape" of this upper reach of the River Hamble
- Involves ancillary equipment (fencing, tracks, outbuildings, tower and CCTV equipment), in addition to the photovoltaic panels, that will detract from the visual qualities of an area that borders the National Park
- Creates a 150+ acre ribbon of industrial development that, in the SDNPA's own words, "would erode the setting of the National Park"
- Makes a very obvious and largescale change to the character of this valued landscape.

2. A feature that "may be considered of national significance".

Notwithstanding the arguments above, Winchester City Council (WCC) itself has identified the importance of a particular feature of this landscape.

In WCC's Local Plan Part 2 (LPP2), paragraph 4.2.17 refers specifically to "a key historical feature... around Bishop's Waltham is the Deer Park. Where it survives well, the Park Lug may be considered to be of national significance and where it is in proximity to proposed development then it should be appropriately assessed as to whether paragraph 139 of the NPPF might be applicable. Also, the impact of new developments on the settings of the Palace, views from the Palace and the Deer Park as a landscape feature needs to be assessed to ensure any adverse impacts can be avoided or minimised through suitable mitigation."

Just to be clear, the Deer Park referred to is of historical significance itself. It is one of only 37 such parks mentioned in the Domesday Book and dates back to Saxon times - Waltham being a Royal Estate into the tenth century. In medieval times the Park Lug enclosed 1,000 acres of deer park used for centuries by the Bishops of Winchester and the monarchs of the day as a hunting ground. No less than 15 Kings and Queens of England stayed at Bishop's Waltham's Palace before its destruction in 1644 and it is certain that almost all participated in hunting within this park. Indeed next year is the 500th anniversary of Henry VIII's meeting with the Holy Roman Emperor, Charles V, at the Palace to sign the "Treaty of Waltham" - it is recorded that they frequently hunted together over this ground.

The proposed solar farm is surrounded on three sides by the Park Lug and if built would mean that, in combination with the existing development, solar arrays would practically straddle the widest part of the park. What had previously been confined to one corner of the park would spread westwards and come to dominate the whole southern area of the park landscape. The overall, combined effect of this industrialisation (with its 2 metre high perimeter fencing with 62 security cameras, 15 metre mast, metal clad inverter cabins, shipping containers for battery units, electricity substation, switchgear and communication buildings) would seriously impact any sense of historical significance within this currently green open space.



Park Lug shown in white, existing and currently being built site in pale blue, new proposed development in red outline.

3. Settlement Gap

The Partnership for South Hampshire (PfSH), a grouping of 12 local authorities including WCC, was formed in 2003 and describes itself as “a great example of local authorities, local partners and government agencies working together for the benefit of the people living in and working in and visiting the region” (of South Hampshire).

In June 2016, PfSH issued a Spatial Position Statement. Its prelude reads:

“We see countryside gaps between settlements as important to maintaining the identity of different places. We also want to protect local landscapes and wildlife sites.”

In discussing development it acknowledges that “the potential for further development is constrained by needing to maintain an appropriate minimum width for key **countryside gaps** or **open spaces** in other locations; landscape and landownership considerations; and the rural relatively unconnected nature of parts of Winchester.”

It also emphasised “the need to maintain **open natural green space** and countryside gaps between settlements.”

The Position Statement reads: “S1: STRATEGIC COUNTRYSIDE GAPS Strategic countryside gaps between settlements are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities.”

In our view, in relation to this application, the key words are “open natural green spaces”.

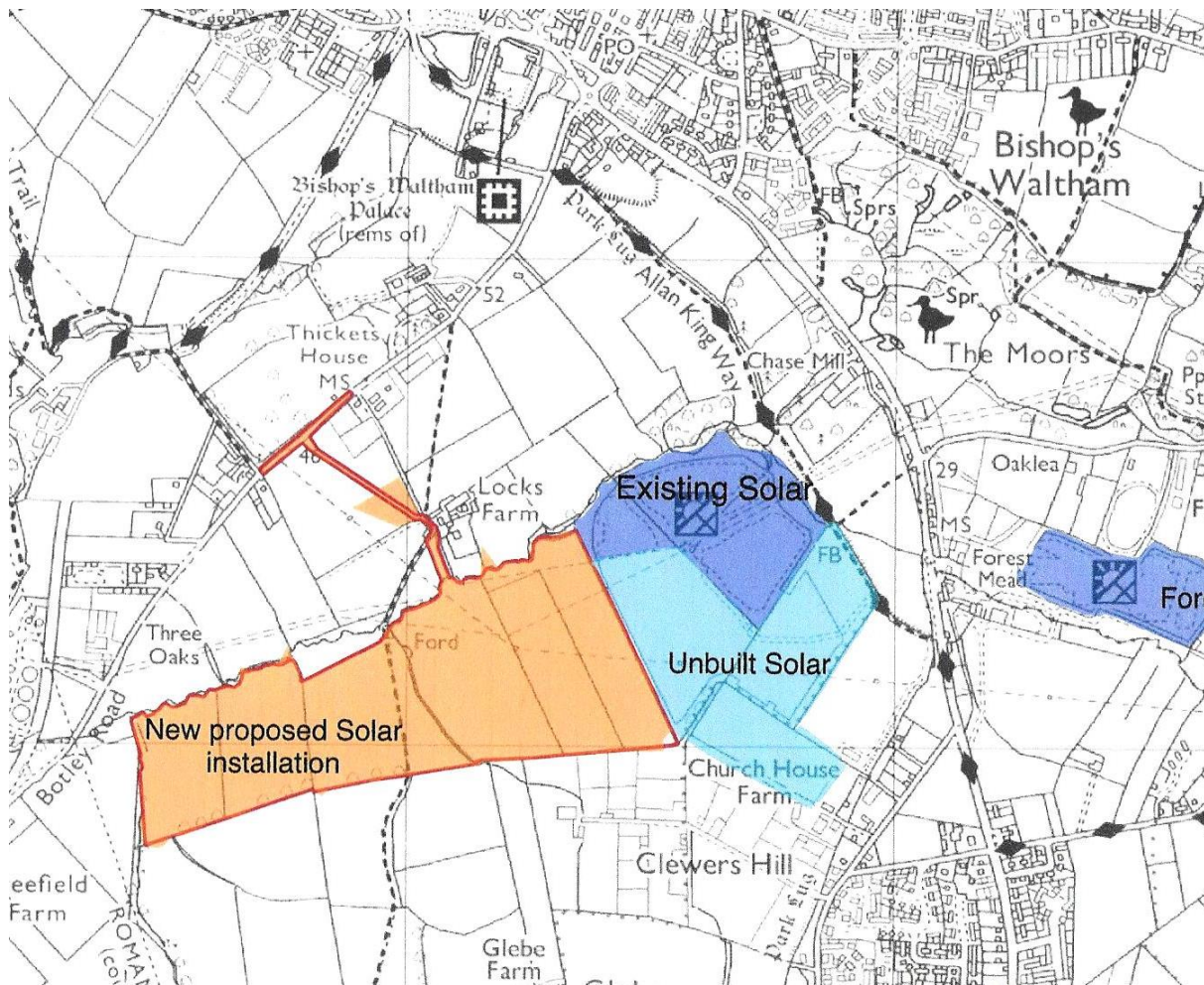
We note that in the Officer’s Report for the Winchester Road solar farm (15/00786/FUL), the issue of that application’s implications for any settlement gap was addressed as the Bishop’s Waltham - Swanmore Gap. This seems obtuse given that the site is to the west of the B2177. So we assume it was a simple typographical error and should have read “the Bishop’s Waltham - Waltham Chase Gap”.

Of greater concern is that the only aspect addressed in that report was that the “the proposed development would include an access track and a substation building in this location, the track would largely replicate the existing concrete track. Furthermore, the substation is very limited in scale and is screened by proposed planting.” This seems to wish away the fact that photovoltaic arrays would spread over nearly 70 acres of “open natural green spaces” (PfSH’s term).

There can, surely, be no doubt that acres of solar panels is an industrialised development of the landscape and countryside and must be acknowledged as “development”. To suggest that all that counts as a ‘development’ is a track and a substation is to ignore reality. This application is for a large scale industrial development.

Solar panels, almost by definition, destroy “open natural green spaces” whether there is a track and substation or not.

As you may well be aware, the area marked pale blue of the Developer’s Agent’s map (shown below) is actually now being built. So we will have a strip/ribbon development across a landscape that is at present undeniably a “countryside gap” and a long stretch of ‘open natural green space’. As such, it poses an unacceptable threat to the critically important ‘settlement gap’ between Bishop’s Waltham and Waltham Chase.



Map extracted from Intelligent Alternatives documentation

Indeed the Society is not only concerned that the scale of this development means that it will close the settlement gap between Bishop's Waltham and Waltham Chase but will, in addition, effectively connect Bishop's Waltham to the parish boundary at Curdridge.

In our view this is contrary to LPP Part 1 CP18 (Settlement Gaps) because it will physically and visually diminish the gap between Bishop's Waltham and, in particular, Waltham Chase, contrary to the requirement to retain open and undeveloped land between the settlements.

4. Failure to consult

In closing, the Society wishes to express its strongest disappointment, echoing that of Bishop's Waltham Parish Council, with the lack of Community consultation undertaken by this Applicant, in marked contrast to other major developments in the town in recent years. We are dismayed to read in the letter of objection from the residents most immediately affected by this development that the Applicant refused to meet with them, describing this courtesy as having "no merit".

We note that the NPPF states that "Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot" (Paragraph 128). We hope that Winchester City Council will consider this in judging the merits of this Application. We also note that Solar Trade Association expects Members to "engage with the community in advance of submitting a planning application, including seeking the support of the local community and listening to their

views and suggestions” and that Winchester against Climate Change (WinACC) makes the point that it is “unlikely to support a planning application which overlooks this commitment”.

We therefore object most strongly to this planning application and trust that Winchester City Council will refuse permission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Tony Kippenberger', with a long horizontal flourish extending to the right.

Tony Kippenberger
Chairman

cc: Mike Berry, Josie Woods (BW Parish Council)