



Clearstone Energy
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DLP Planning Ltd

Our Ref: 20/00180/PREAPP
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PROPOSAL: Solar Photovoltaic Farm
AT
SITE LOCATION: Street Record, Bidden Road, North Warnborough, Hook, Hampshire

Dear Sir/Madam

I refer to your pre-application submission, validated on 29.01.2020, relating to a proposed solar photovoltaic farm at land off Bidden Road to the south west of North Warnborough (the 'site'). I have reviewed the submitted pre-application information (Cover Letter dated 24.01.2020, Location Plan D01 and the proposed layout plan).

We discussed the site in our online meeting of 02.04.2020. This letter provides a summary of the Local Planning Authority's (LPA) pre-application advice. It does not seek to repeat in detail the verbal advice previously provided but summarises the key advice.

The Site

The site extends to 143 hectares (ha) of agricultural land as shown on the Location Plan. It includes land to the north and south of Bidden Road, surrounds Chosley Farm and extends south to meet Alton Road. The site is positioned between a number of settlements; North Warnborough to the north east, Odiham to the east, RAF Odiham to the south east and Greywell to the west.

Proposed Development

The application proposes a solar photovoltaic farm (SVF) consisting of rows of solar photovoltaic panels, associated inverters (x32), a customer substation compound on-site substation compound and associated development. Further details are provided in the Cover Letter.

In addition, you advised:

- There would be no built development on the areas north west of Bidden Road;
- The SVF would be enclosed and this would likely consist of 1.8m high herras style fencing; and
- The SVF would utilise the existing access from Bidden Road to Chosley Farm.

It is noted that the SVF would generate 50 megawatts (MW) of energy per annum. This advice has been prepared on the basis that that the capacity of the 'generating station' is not more than 50MW and does would not be catorgarised as a Nationally Significant Infrastructure Project (Planning Act 2008).

Planning History and Policy

There is no relevant planning history for the site.

The development plan for the site is the Hart Local Plan (Strategy & Sites) 2032 (dHLP32) which has been recently been adopted, Saved Policies of the Hart District Local Plan (Replacement) 1996-2006 and First Alterations to the Hart District Local Plan (Replacement) 1996-2006 (HLP96) and the Odiham and North Warnborough Neighbourhood Plan (ONWNP, 2017). The Saved Policies of the HLP96 are identified at HLP32 Appendix 5.

The site is in a countryside location outside of any defined settlement boundary.

There are two public rights of way running across the site as identified on the submitted Site Location Plan.

Greywell Fen Site of Special Scientific Interest (GFSSSI) is located to the immediate north west of the site.

The site is within the Hart Downs Landscape Character Area (HDLCA).

Principle of Development

HLP32 Policy NBE10 sets out that proposals for energy generation from renewable resources will be supported provided that any adverse impacts are satisfactorily addressed. The criteria at NBE10(a-f) are considered as relevant elsewhere in this advice.

There are no specific policies relating to renewable energy in the ONWNP but Policy 12(iv) states that, inter alia, development proposals that contain measures that will help to mitigate the impacts of, and adapt to, climate change will be supported.

The National Planning Policy Framework (NPPF, 2019) supports renewable energy (para. 148). It advises Local Planning Authorities not to require applicants to demonstrate the overall need for renewable energy and to approve applications if impacts are (or can be made) acceptable (para. 154).

Accordingly, there is support for the principle of the proposed development in the development plan and NPPF, subject to impacts been addressed.

However, any potential impacts upon RAF Odiham to the south east should be carefully considered. In particular, the potential impact its operational requirements. Early consultation is recommended in this regard.

Countryside and Landscape Impacts

The SVF would introduce built development on a greenfield site over a significant area, as shown on the site layout plan.

The impacts upon the countryside and landscape would therefore be an important consideration in any future application to which the following (summarised) policies would apply:

- HLP32 Policy NBE2 Landscape - development must respect and wherever possible enhance the special characteristics, value or visual amenity of the District's landscapes. This should be done with reference to the HDLCA (a), visual amenity and scenic quality of the landscape (b) and other identified criteria.
- ONWNP Policy 5(v-vi) - development shall seek to retain existing mature hedging and established trees and to enhance landscaping to provide for biodiversity. Views out towards the countryside should be considered and where possible retained or enhanced.
- ONWNP Policy 12(ii-iii) - development should not adversely affect the distinctive character of open landscapes or harm public views or vistas. PRow should be protected and/or enhanced.
- HLP96 Saved Policy GEN1(v) - proposals should include for the provision or enhancement of the Districts landscape and natural resources.
- HLP96 Saved Policy CON23 - development that would seriously detract from the amenity and consequent recreational value of PRow by reducing their rural character or detracting from significant views will not be permitted.

The Hart District Landscape Assessment (para. 5.33) refers to the HDLCA as:

"Overall, the open, rolling chalk scenery of the Hart Downs is of high visual quality and presents a striking contrast with the more muted lowland landscapes further north. Of particular scenic value are those areas which have retained a predominantly pastoral character and a stronger structure of hedgerows and woodland blocks, which provide shelter, visual containment and add diversity to the landscape. However, other areas have a denuded, exposed character as a result of conversion to arable farmland which has led to field enlargement, loss of hedgerows and trees and greater intrusion of power lines and development. The Odiham airfield is particularly prominent and detracts from local landscape quality."

The NPPF provides guidance on conserving and enhancing the natural environment (Section 15), including recognising the intrinsic character and beauty of the countryside (para 170b).

Any future application should be accompanied by a comprehensive landscape

and visual impact assessment that considers the impacts from key receptors. This should include PRoW, highways and existing residential properties. It should take into account all potential visual impacts, including solar glare.

The site has a sloping topography and various glimpsed and open views into it. Key receptors would likely include, but not be limited to; Alton Road (particularly the more open views when moving north), Bidden Road, the PRoW crossing the north parts of the site, Chosley Farm, properties on the west side of RAF Odiham, heritage assets (see following section) and GFSSSI.

It is noted that the proposal is for a 40 year period. This does not obviate the need to comply with the above policies but would be a material consideration in respect of the longevity of any landscape and visual impacts. This would be related to their relative permanence and 'reversibility'.

Any future design and layout of the development should demonstrate how any adverse landscape and visual impacts have been minimised through minimising the quantum and massing of built form, careful siting and any necessary mitigating.

Design and Heritage

Relevant design and heritage policies include HLP32 Policies NBE8 Historic Environment; NBE9 Design; NBE10 Renewable and Local Carbon Energy; NBE11 Pollution, and; I2 Green Infrastructure, HLP96 Policy GEN1 General Policy for Development, and ONWNP Policies 5 General Design Principles; 6 Odiham Conservation Area; 7 North Warnborough Conservation Area, and; 12 The Natural Environment. These policies are available to view online in full, so the wording is not repeated here.

The provisions of NPPF Section 12 'Achieving well-designed places' should also inform any scheme, as should the Government's National Design Guide (MHCLG, October 2019).

The layout of the site would be important in this instance and this is largely linked to the relative impact on the countryside and landscape (see previous section). It is noted that no built development is proposed on the area north west of Bidden Road. This is considered, in principle, a good approach as this part of the site could be considered more sensitive given the proximity of the GFSSSI and Greywell Conservation Area and 'important views' from the latter.

In heritage terms, the site is not within any, nor does it contain, any designated heritage assets. However, the conservation areas of North Warnborough, Odiham and Greywell are located to the north east, east and north west of the site respectively. There are also listed buildings in North Warnborough (immediately north of the site), RAF Odiham and Greywell.

Any potential impacts on the significance of these heritage assets from development within their settings (if applicable) should be considered in accordance with the guidance in the NPPF (paras. 189-196). Any such assessment should be proportionate to the assets importance and no more than is sufficient to understand the potential impact upon significance.

A number of archaeology points (x5) are identified on the site to the south and east of Chosley Farm. These should be investigated and considered in the context of the above policies and guidance.

Ecology

As identified above, the site is close to the GFSSSI. It is also a greenfield site.

Any proposal should not result in the loss of habitat and the applicant should consider how the proposal would deliver a quantifiable net gain for biodiversity. Relevant ecological surveys and a biodiversity calculation should be undertaken and provided with any future planning application.

The north east part of the application site has the potential to contribute to the ecological enhancement of the GFSSSI (e.g. 're-wilding') and we would encourage you to liaise with the Surrey Wildlife Trust in this regard.

The provisions of HLP32 Policy NBE4 and ONWNP Policies 5(v) and 12(i) in relation to any relevant protected species and biodiversity impacts are relevant. The NPPF (para. 170) and Policy NBE4 seek a net gain in biodiversity.

Any impacts on trees, woodland, hedgerows of amenity value would be considered with reference to HLP32 Policy NBE2(d), HLP96 Policy CON8 and ONWNP Policy 5(v).

Other Planning Considerations

The following matters and policies would also likely be relevant to a future planning application for a SVF at the site:

- HLP32 Policies NBE5 and NBE6 and ONWNP Policy 12(v-vi) in relation to flood risk and water quality, although the Hart District Council Strategic Flood Risk Assessment (July 2016) indicates that the site is located within Flood Zone 1.
- The requirements of HLP32 Policies NBE10(a) and I3, HLP96 Saved Policy GEN1(vii) and ONWNP Policy 5(viii and xi) in relation to access, parking and servicing arrangements. Servicing, including any waste and recycling storage and collection should be considered at an early stage and integrated into the development. It is noted that it is proposed to utilise the existing access to Chosley Farm from Bidden Road. It would need to be demonstrated that this access and any parking provision to be provided is appropriate for the nature and volume of traffic associated with the proposed use and there would be no adverse impacts on highway safety. Given the extent of the built development proposed and the rural location of the site, a construction management plan should be provided upfront with any future planning application.
- The site is agricultural land. You advised that grazing could continue on land on which solar panels are located. Notwithstanding, the potential impact on any high-grade agricultural land (as applicable) should be considered in accordance with HLP32 Policy NBE10(d).

Other Representations Received

Comments have been provided by Odiham and South Warnborough Parish Councils, these are available to view online. These largely identify issues considered above.

In addition, the application was discussed with Greywell Parish Council and their comments have been passed on and covered above.

Scope of Future Planning Application

The Council have published validation criteria for planning applications, these can be found on the Council's website. Requirements are linked to the type of application.

In addition to the mandatory requirements, the following are also likely to be local requirements sought for a SVF scheme at the site. However, this is not a definitive list and is subject to the nature of any future application:

- Agricultural Land Assessment
- Arboricultural Assessment
- Biodiversity Assessment (including surveys, existing records and biodiversity calculation)
- Energy Statement
- Flood Risk Assessment and Drainage Strategy
- Heritage Assessment
- Landscape and Visual Impact Assessment
- Planning Statement
- Statement of Community Involvement
- Transport Assessment

Any documentation should be proportionate to the nature and scale of any application and it is recognised that in some instances it may be appropriate to incorporate within other documents (e.g. a comprehensive planning statement). In any event, documents and plans should be clearly signposted in a cover letter to assist validation and review.

SVFs are not specifically listed in Schedule 1 or 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, but 'energy industry' developments are. We advise that you carefully consider the selection criteria at Schedule 3 in respect of the potential for EIA screening.

Concluding Comments

In summary, based on the information submitted, the principle of a solar photovoltaic farm at the site does not need to be justified in 'need' terms and is potentially supportable in principle pursuant to HLP32 Policy NB10. However, the site is in close proximity to RAF Odiham and we encourage you to engage with them at an early stage to ensure that the proposal does not conflict with any operational requirements.

In addition, there are several areas where detailed consideration and justification would be required as identified in this advice. In particular, the impact of any such development on the countryside and landscape is key.

The advice set out above is based on the information submitted but without the benefit of publicity and so is made without prejudice to the consideration of any application. Although the advice might indicate the likely outcome of a formal planning application, it is only informal advice and no guarantees can or will be given about the decision that will be made on any such application.

Yours faithfully

Robert Moorhouse
Place Services