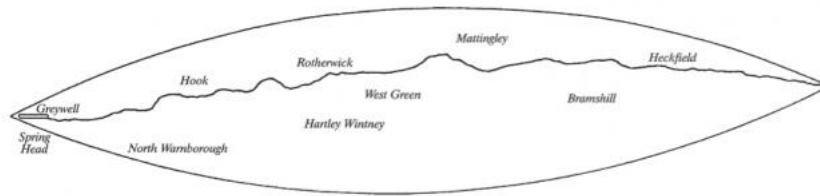


The Whitewater Valley Preservation Society



Robert Moorhouse
Principal Planning Officer
Hart District Council

By email: robert.moorhouse@hart.gov.uk

21st April, 2021

Dear Mr Moorhouse,

21/00552/FUL

Solar Farm and battery stations together with all associated works, equipment and necessary infrastructure

Bunkers Hill Farm Reading Road Rotherwick Hook Hampshire RG27 9DA

Based on the detailed analysis in the reviews attached and summarised below, the Whitewater Valley Preservation Society considers that this substantial development proposal would industrialise the open countryside of this very distinctive rural section of the Whitewater Valley. Consequently, the Society strongly objects to this application.

The attached documents provide a critical analysis of the omissions and failings in the applicant's LVIA Assessment, Heritage Statement and Ecology assessment.

Hart District Council's pre application advice listed the many policies which apply to this application and assessments required to support it. It concluded that "*In particular, the impact of any such development on the countryside and landscape is key*".

The test in Hart's own, recently adopted, Landscape Policy NBE2 is of **No** adverse impact to the defined characteristics listed in the policy.

While recognising the country's need for renewable energy, to consider granting any such application, Hart District Council must be certain that the assessments provided are rigorous, thorough and accurate.

WVPS has analysed three of the crucial areas and found the assessment in each of the areas not to have reached the benchmark of rigour, thoroughness and / or accuracy.

LVIA

The WVPS' professional adviser has shown that the LVIA contains many flaws in its approach and, therefore, cannot be relied upon to determine this application.

- It omits an analysis of the topography and contours though undulating land is recognised as particularly sensitive to solar farms and therefore under-estimates its susceptibility to such development;
- It fails to re-assess the landscape as required by guidelines for LVIA and entirely ignores the Hampshire Historic Landscape characterisation and therefore ignores the Valley as a landscape unit;
- The baseline assessment provides only a simple assessment of landscape value and does not adequately explore all relevant factors;

- Of the 10 viewpoints identified in the LVIA, our evidence shows that 7 would be adversely affected, with proper mitigation impossible. Of these, 4 would suffer major or significant adverse effect. Furthermore, our evidence shows that 7 additional key view points from roads and PRow have not been identified or assessed at all.

Landscape

The Society's assessment is that no amount of vegetation (existing or additional) within the valley can screen the industrialising effect of such a large development. The topography of the land, the extensive scale of the proposal and the height of the panels cannot be mitigated, and from roads and paths particularly on the eastern side of the valley the development would be extremely intrusive giving a significantly adverse effect. The valley is small in landscape terms so this detrimental effect would be experienced at relatively close quarters.

PRow

The applicant's own LVIA concludes that there would be major adverse effects on both PRow 17 and 23 in the short-term reducing to moderate in the longer term. But their LVIA does not take into account the enclosing effects of creating tunnels of varying widths between the 3 metre high panels either side of the paths, and removing most of the valley-wide views, against which the proposed mitigation would have no impact.

The LVIA totally underestimates the effect on PRow 16 and 31 from whose upper slopes there are numerous and sequential views across the valley which would remain severely impacted through the life of the project. And it fails altogether to consider the substantial impact on long sections of PRow 23.

Heritage Statement

Our assessment of the applicant's Heritage Statement demonstrates that the applicant has

- not followed the latest Historic England Guidance note on Setting of Heritage Assets;
- failed even to identify all the designated Heritage Assets that would be affected;
- failed to analyse the true impact of the proposed development on the settings of Heritage Assets, their significance and historic relationship to the landscape;
- failed to consider the potential commercial effect on Heritage Assets of making PRow 17 and 23 extremely unappealing to walkers and visitors;
- ignored the Grade II* Heritage Assets which would be affected, notably Borough Court

The selective use of GPA3 in the production of the Heritage Statement means the impact on Heritage Assets and landscape has been inadequately assessed. The Heritage statement cannot, therefore, be relied upon to assist in determining the application.

In the Society's view, the settings of and landscape surrounding Borough Court, Damales, Bunker's Hill Farm and Barns, The Leather Bottle Public House and Bartletts Farm complex would be adversely impacted.

The landscape itself is of historic value and that too would be subject to severe adverse impact.

By contrast, precedent at Appeal shows that the Secretary of State, whilst recognising the need for renewable energy, does not believe that this need outweighs the harm to the setting of designated Heritage Assets.

Ecological Appraisal

- WVPS assessment shows that there will be a negative impact on protected, indicator and notable species, including dormice, bats and birds such as skylarks, linnet and lapwing, and aquatic invertebrates.
- By failing to conserve and enhance biodiversity, contravenes Hart Local Plan 2032 policy NBE4.
- By failing to protect and enhance the River Whitewater to assist in the achievement of Good Ecological Status, contravenes policy NBE6.

Summary

Analysis of the application has revealed that the applicant has failed to meet the pre-application advice provided by not providing thorough, rigorous assessments of the effects on landscape, Public Rights of Way (PRoW), Heritage Assets and ecological impact.

The Society's thorough reviews of the developer's assessments reveals the true extent of damage that would be caused by this proposal to the landscape, PRoW, Heritage Assets and ecological impact. The reviews also demonstrate that the application fails to comply with policy requirements and, therefore, fails to satisfy the basis on which the application could be approved.

In conclusion, and based on the reviews provided by the Society, the Society believes this development would have a significantly negative impact on the Whitewater Valley. The development would destroy the valued landscape and historic assets / environment of the Whitewater Valley. Were such a development to be approved it would change the rural nature of the Whitewater Valley and adversely affect the enjoyment of its landscape by this and future generations.

The Society's members believe passionately in the integrity of this beautiful section of the Valley and are distraught at the damage that would be caused to this idyllic and characteristic lowland river valley by what would be an extremely industrial intrusion of the proposed solar farm and its accompanying paraphernalia.

It is on this basis that the Whitewater Valley Preservation Society objects to the application and we therefore trust that Hart will refuse this application.

Yours sincerely,



Candy Burnyeat
Chairman,
Whitewater Valley Preservation Society

Contents:

Review for WVPS of LVIA for 21/00552/FUL	pages 1-20
WVPS Review of Heritage Statement for 21/00552/FUL	pages 21-33
WVPS Review of Ecological Appraisal	pages 34-36

Bunker's Hill Solar Farm and Battery Stations Comments on Landscape and Visual Assessment

1 Introduction

1.1 Appointment

- 1.1.1 Alison Farmer Associates (AFA) was appointed by the Whitewater Valley Preservation Society (WVPS) to undertake a review of the Bunker's Hill Solar Farm and Battery Station Landscape and Visual Impact Assessment (LVIA).
- 1.1.2 The proposed development has been submitted by JBM Solar Projects 18 Ltd as a full planning application 21/00552/FUL to Hart District Council.

1.2 Scope of work

- 1.2.1 This review focuses on the landscape and visual impact of the proposed development on the receiving landscape. It follows guidance published by the Landscape Institute in relation to reviewing landscape and visual impact assessments (LI Technical Guidance Note 1/20) and has been undertaken by Alison Farmer (BA MLD MLI) a qualified landscape architect with over 25 years' experience in LVIA.
- 1.2.2 The review has also made reference to the following application documents:
 - Design and Access Statement
 - Planning Statement
 - Heritage Statement
 - Arboricultural Impact Assessment (Tyler Grange)
 - Associated drawings and plans

1.3 Approach

- 1.3.1 The work has included a desk based review and site visit. Where specific aspects of the scheme are not mentioned in this report it should not be taken as acceptance of what is proposed or assessed.
- 1.3.2 The report considers firstly the methodology adopted in the LVIA and the presentation of data. It then goes on to review the baseline assessment followed by a review of the landscape and visual effects. The conclusion summarises the findings of the review and highlights areas where additional information would provide helpful clarification.

2 Methodology

2.1 Overview

2.1.1 The methodology used to assess the effects of the proposed development is set out in Appendix 3 of the LVIA. It is broadly in accordance with published guidance and makes a clear distinction between landscape character and visual effects. The definition of the study area extending to 2km from the site is regarded as adequate to record the effects of the proposed scheme. However, the following points are noted:

- Table 2 does not adequately allow for landscape which has a recognised value but no formal designation.
- Table 3 does not adequately reflect those aspects of a landscape which are known to increase landscape sensitivity to solar developments. For example, landform is a key consideration and is referred to under enclosure while perceptual qualities are not mentioned at all.
- Typical descriptors of landscape and visual effects in tables 10 and 11 respectively do not illustrate the full range of descriptions as shown in table 9 i.e., a major adverse visual effect can arise not just due to high sensitivity and high magnitude of change but also where there is medium sensitivity and high magnitude of change or a high sensitivity and medium magnitude of change.
- Table 8 does not describe how a consideration of size/scale of change, geographical extent or duration influence judgment on magnitude of change.

2.2 Landscape character

2.2.1 The Guidelines on Landscape and Visual Impact Assessment (GLVIA) states in para 5.13 that *‘existing assessment must be reviewed critically as their quality may vary, some may be dated and some may not be suited to the task in hand.’* No such review is set out in the LVIA. This is important as it appears that none of the assessment accurately define the Whitewater Valley. The Hart District Assessment is the most effective at describing the valley characteristics but even this assessment excludes the valley sides to the west of the site. In reality the valley is a perceived landscape unit including both east and west valley sides.

2.3 Landscape Value

2.3.1 The LVIA makes no reference to recently published guidance by the LI¹ on valued landscapes which provides further information on what should be taken into account when assessing value, in addition to the factors listed in Box 5.1 of GLVIA.

2.3.2 GLVIA highlights that the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value. Box 5.1 and the more recent LI guidance highlights the need to consider a range of factors including scenic quality and conservation interest and recreation value for example. The LVIA does not include a transparent assessment of these relevant factors. It states

¹ Landscape Value and valued landscapes, Technical Guidance Note Consultation Draft 02/21, LandscapeInstitute January 2021

at paragraph 4.18 *'factors are not analysed in detail due to the scope of this LVIA'*. However, given the past interest in the special qualities of the Whitewater Valley landscape (see paras 5.4.1 – 5.4.2 below), this is considered to be an omission.

2.4 Visual Effects

- 2.4.1 The LVIA provides information on 10 viewpoints all of which fall within the Zone of Theoretical Visibility as shown on Drawing PO2-0535-03. There is no indication that these viewpoints were selected and agreed with the Local Planning Authority. A site visit has revealed that these viewpoints whilst showing a range of different views from the surrounding landscape, fail to effectively demonstrate the visual effects of the scheme and especially the sequential views gained along footpaths 17 and 23 which cross the Whitewater Valley. Furthermore, they do not include viewpoints from Reading Road or Borough Court Road/Murrell Green Road or other footpaths to the north and south of the site.
- 2.4.2 The LVIA classifies all receptors from Public Rights of Way (PRoW) as high sensitivity but from roads as medium sensitivity. However, receptors using quiet rural lanes for recreation in the vicinity of the site (e.g., Borough Court Road/Murrells Green Road) should also be classed as high sensitivity.
- 2.4.3 Para 5.2 of the LVIA notes that the assessment was carried out in mid-September and the photographs in the LVIA taken in late April. It is likely that there was notable leaf cover at both these times of year and that the screening effects of vegetation should be considered medium and not low as stated.

3 Presentation of Data

3.1 Mapping

- 3.1.1 There are no plans within the LVIA or wider documentation that show the detailed topography of the site. A topographic survey has been undertaken as illustrated in the Constriction Traffic Management Plan drawings, but this information has not been provided for the site as a whole. Furthermore, the topography of the site and the layout of the solar panels are not overlaid. This would be useful considering the nature of the views and how the panels will be perceived from various viewpoint locations i.e., whether the views are of the fronts, backs or sides/rows of panels.
- 3.1.2 Drawing Number P20-0535-11 Topography and Public Access is helpful but does not show sufficient detail regarding local topography. The contours on the plan appear to be at 10m intervals which is less than that shown on an OS 1:25,000 map. This drawing also fails to show local cycle routes many of which link into and use the Murrell Green Road/Borough Court Road to the west of the site. Nevertheless, the plan does illustrate how rising land at Bunker's Hill, coupled with the higher land to the west of the site defines a relatively narrow stretch of valley in the vicinity of the site. The valley broadens to the south and north and is less clearly defined topographically.
- 3.1.3 Drawing P02-0535-03 illustrates the Screened Zone of Theoretical Visibility and Viewpoint Locations. Again, this plan is informative demonstrating the level of visibility within 2km of the site and especially within the valley itself. However, the base map is not clear and the yellow ZTV not sufficiently transparent to read the underlying base mapping.
- 3.1.4 The LVIA provides no mapping of the Historic Landscape Characterisation for Hampshire which illustrates the range of historic enclosure patterns within the site and surrounding landscape including early enclosure patterns reflecting assart clearance and early wavy field boundaries of late medieval/17th and 18th Century. Nor is there a map of local natural and cultural features - elements of the landscape which contribute to local character and sense of place. The Heritage Statement does include a series of maps showing heritage designations and features including the Grade II* listed building at Borough Court, conservation areas and parkland in the surrounding area and pillboxes and anti-tank ditches which line the Whitewater Valley, but these are not referred to in the LVIA. Similarly, the Planning Statement includes an Environmental Designations Plan (P20-0535-01) although this is missing from the document.

3.2 Photographs and Visualisations

- 3.2.1 The LVIA includes a number of photographs relating to the ten selected viewpoints. The images are useful and good quality. They would benefit from having key buildings and landmarks annotated. While the extent to the solar panels is indicated it would also be helpful to have the substation located where relevant.
- 3.2.2 Given the extent of the proposed development on the western valley sides and the close proximity of some views, it is not possible to capture the full extent of the development within a single frame. This point is not made clear within the LVIA. The single frame on an A3 page only enables part of the site to be represented at

various viewpoints e.g., 4 and 9. In reality a much wider area of development would be visible from each location - this is a significant limitation of the presented visualisations. LI Guidance on Visual Representation of Development Proposals (Sept 2019) states in para 81.2 that '*where it is important to communicate the wide-angle nature or context of the view, panoramas are preferable to limiting the view by cropping*'. This issue is partly addressed in the photomontages which were prepared for consultation. The first photomontage is from Viewpoint 4 in the LVIA and the second photomontage from Viewpoint 5. These montages show a wider panorama and extent of development although the shading used to depict the development appears muted in colour and abstract.

4 Baseline Assessment

4.1 Description of Proposed Scheme

- 4.1.1 The description of the proposed development within the LVIA does not set out all the key components of the scheme which are likely to give rise to landscape and visual effects. The description contained within the Design and Access Statement is more informative.
- 4.1.2 The site comprises 70.09 hectares over six agricultural fields in open countryside to the north of Hook. The east-west extent of the development is approximately 750m and the north-south extent is approximately 1.5km. The development would sit on the western side of the Whitewater Valley, the river lying immediately to the east of the site. The highest point of the site is c. 80m AOD in the south west and falls to around 58m AOD in the northeast. The slopes are most pronounced in the southern part of the site at Bunker's Hill. Beyond the site to the west the valley sides also rise to Murrell Green Road.
- 4.1.3 The development would be accessed via an existing farm track leading to Bunker's Hill Farm and Industrial Park.
- 4.1.4 The solar panels would be static and up to 3m in height and would be arranged in an east-west orientation and perpendicular to the contours on the valley sides spaced 4-6.5m apart. The development would also include the following components:
- Permanent substation comprising ancillary buildings c. 3m in height, battery units/inverters, DC-DC convert houses and ancillary equipment - shown on drawing 23052-0300
 - 33 battery units comprising containers c.3m high and 12.2m long arranged in groups of three and clustering in the north of the scheme and around the substation and southeast boundary of the site
 - 9 central inverters comprising containers c2.8m high and 12m long distributed around the site
 - CCTV cameras mounted on 3m high poles around the site
 - 2m high security deer fencing around the perimeter of the site and 2.4m high palisade fencing around the substation
 - 4m wide access track comprising crushed aggregate around the site
 - 4 gates in perimeter fencing where the access track intersects with the PRow
 - 12 hectares of wildflower meadow (c17% of the site)
 - Approximately 2389 linear metres of hedgerow
 - Approximately 2400square meters of understory planting and 24 trees

- 4.1.5 The proposed development is considered temporary and would last for 40 years, which is a considerable period of time. The substation however would be permanent.
- 4.1.6 No information is included in the LVIA in relation to the construction stage of the development which is likely to last c. 4 months. During this time there will be considerable activity on the site.

4.2 Description of the Baseline

- 4.2.1 The LVIA does not describe the topography of the site. This is a critical aspect of understanding and assessing the effects of solar farms and ensuring successful integration of a development of this type. Landscapes where topography contributes to sense of place can be more sensitive to solar farm development and best practice advocates that solar panel rows should, wherever possible, follow contours rather than run perpendicular to them.
- 4.2.2 The baseline assessment makes reference to the relevant landscape character assessments. However only the landscape character areas and types within which the site falls are considered and the character areas and types which lie immediately adjacent are not reviewed.
- 4.2.3 The baseline assessment provides only a simple assessment of landscape value and does not adequately explore relevant factors. Although the assessment concludes the value of the landscape is medium it does not clearly set out the factors which contribute to this. This is important as it informs sensitivity and judgments regarding the nature of effect.
- 4.2.4 No consideration is given to the historic character of the landscape and no reference is made to Hampshire's Historic Landscape Characterisation which describes the historic landscape patterns through the Whitewater Valley.

4.3 Description of Mitigation

- 4.3.1 The LVIA states that '*a variety of landscape and visual mitigation measures have been incorporated through the iterative design process in order to prevent, reduce or offset potential landscape and visual effects.*' The key mitigation is described at para 2.5 and includes:
- Exclusion of development from the eastern part of the site to provide a physical and visual buffer to PROW and the river (although the setback around footpath 17 is minimal – refer viewpoint 9)
 - New planting to screen and filter views and enclose certain close-range views through the site (such screening will also curtail existing views of the valley afforded from these routes)
 - New hedgerows and some small areas of woodland planting along the northern boundary and adjacent to the substation (although this planting would not mitigate views of the substation from the south, nor of the solar panels where they extend across the mid valley slopes).

- 4.3.2 The LVIA assumes growth rates of new planting to be 0.5m per annum. This is considered to be optimistic given the substantial deer population in the area. Proposed planting is outside of the site perimeter deer fencing and would require further fencing or tree guards to protect it. Double staggered rows for hedge planting are unlikely to result in thick hedgerows within 5 years. For hedgerows to effectively screen development they would need to achieve sufficient lateral growth as well as height.

5 Landscape Effects

- 5.1.1 The landscape effects of the proposed development are separated out into effects on landscape elements (section 3 of the LVIA) and landscape character (section 4 of the LVIA).

5.2 Landscape Elements

- 5.2.1 The LVIA assess the effects on the landscape elements of the site including ground cover, topography, tree and hedge resource and public rights of way. This analysis primarily considers the physical effect of the proposed development on these specific components of the landscape.
- 5.2.2 In terms of landcover the assessment describes the change from arable to pasture concluding a beneficial effect. Whilst the increase in pasture may be considered beneficial it is noted that only a small proportion of the grassland created will comprise wildflower meadow, the remainder comprising a grassland mix for grazing. This is described in the LVIA as permanent pasture but given that the development is for 40 years, after which time it is to be removed, it is unlikely that the grassland will be permanent. Furthermore, it is considered incorrect to conclude that the proposed change in landcover will be beneficial to landscape character. This is because the solar panels will rest above much of the grassland and will be the predominant visual land use when viewed from the surrounding area.
- 5.2.3 In terms of effects on topography, the site is considered to have a sloping landform which is 'uncomplicated' and low value. However, the very fact that the site comprises the valley slopes which drop in height by c22m indicates a sensitivity greater than low. When considered in the context of the valley it is evident from the OS map that the valley slopes are pronounced in the vicinity of the site and the valley is narrowly defined becoming broader to the south and north. Whilst it is accepted that the topography of the site may be little altered physically, the visual prominence of the solar panel rows and associated development will give rise to characterising effects.
- 5.2.4 The LVIA states that there will be no vegetation removal as a result of the proposed development based on the arboricultural assessment (para 3.8). This contrasts with the Design and Access Statement para 3.14 which states that small sections of hedgerow are to be removed to facilitate the access tracks within the site.
- 5.2.5 In terms of public rights of way, the LVIA states that the proposed development has no direct effects on the public rights of way. This is not correct as the masterplan illustrates that the rights of way will be crossed by the access tracks in a number of locations.

5.3 Landscape Character

- 5.3.1 The Hart District and Hampshire Landscape Character Assessments have been used to determine landscape effects. As noted above the Hart District assessment describes the River Whitewater although the boundary of the character areas does not reflect the topography of the valley and excludes the western valley sides which are a key component of the valley in and around the site. Similarly, the Hampshire

assessment determines a change in character along the River Whitewater but in reality, the landscape is perceived as a complete valley unit comprising valley sides to the east and west and a distinct valley floor.

- 5.3.2 Given the definition of areas and types in the assessments and the valley context, all relevant character areas and types should be referenced e.g. to the west Tylney and to the east Hazeley/West Green from the Hart District LCA and to the east North East Hampshire Plantations and Heath from the Hampshire LCA.
- 5.3.3 Para 4.14 of the LVIA notes the site is perceived from the valley floor and northern part of the site but no mention is made of perceptions from the eastern valley sides. The description of the wider landscape includes reference to the A30, numerous transmission lines and settlements. In reality these elements do not significantly intrude on this section of the valley but are more prevalent to the south of the site.

5.4 Sensitivity

- 5.4.1 There are concerns regarding the assessment of the value which fails to adequately articulate those qualities of the Whitewater Valley which are valued. No reference is made to the Whitewater Valley Preservation Society (established in 1980) which seeks to conserve the natural and historic aspects of the valley. Independent publications relating to the Whitewater Valley which set out the qualities of the landscape, including *Whitewater Heritage* and *Journey Down the Whitewater* by Anne Pitcher (1981), are not referenced. The former publication states:

'This is not dramatic scenery, but gentle pastoral farmland, enlivened by a rich assortment of ancient hedges, woods and commons, many of them relics of the enclosure of the Royal Forest of Eversley. They form a splendid example of "ancient countryside" – the old-enclosed organic landscape- which developed in its haphazard way long before the straight hedged, woodless, planned farmscapes of the "open-field" Midlands.

Parts of this landscape may date back to the Iron Age or even the Bronze Age, yet those patterns are everywhere overlaid by medieval boundaries and land management features, the main determinants of the present-day landscape.

Meadows, small copses, broad drove-roads left as relics of the enclosure of once-vast commons, moated manors, and some of the finest fen peat habitat in lowland England all contribute to a land-use pattern of immense age and complexity, which has been complemented through the centuries by the natural potential of the river for milling and fishing.'

5.4.2 It goes on to describe the elements of the landscape which define the area including the River Whitewater and its natural form, rills and meanders, riparian habitats, ancient woodlands, enclosure patterns, commons and greens, and manors and farms. What is clear from this description is that the landscape is valued not just as 'the valley' but also the landscapes which flank it. This is important to understand not least in terms of how the landscape is perceived. People's experience of the valley along public rights of way is gained through crossing it east to west, rather than experiencing the valley along its length north to south. From public rights of way which enter the valley on the elevated valley sides it is possible to perceive the distinct valley of the Whitewater and to look both up and down the valley as well as across to the opposite valley sides.

5.4.3 *For these reasons it is considered that the value of the receiving landscape, and its special qualities have been underestimated.*

5.4.4 The LVIA does not adequately set out the susceptibility of the receiving landscape to the proposed development. The analysis of susceptibility is limited to paragraph 4.22. It concludes that the receiving landscape has a low susceptibility to solar PV due to '*the light footprint and low profile of the panels*' and '*panels following and reflecting the underlying topography*'. This statement does not adequately express the geographical extent to which the solar panels will extend nor the effects of their layout relative to the topography. The fact is that whilst 'low' compared to say wind turbines, they are still c.3m in height and thus have the ability to block views (viewing heights being between 1.5-1.7m high) and significantly alter perceptions of landscape when in close proximity. As noted above no mapping to illustrate topography and development layout is provided in the application documentation and from the OS map it is clear that the panels run perpendicular to the valley slopes. Thus given the sloping and undulating nature of the topography which defines the valley; the relatively intimate scale and narrow width of the valley; the open character of some parts of the valley; historical field enclosures which include fields with sinuous boundaries²; landcover which includes pasture on the valley floor and arable on the valley sides; and scenic qualities derived from the pattern of land use, enclosures and topography and built features, ***it is considered that the susceptibility of this landscape has also been underestimated.***

5.5 Sensitivity, Magnitude and Significance

5.5.1 As a result of an underestimation of the sensitivity of the receiving landscape to the form of development, predicted changes in landscape character have not been fully understood. The LVIA accepts in para 4.24 that the proposed development would '*add a new large-scale element to the landscape*' but it justifies the acceptability of this change based on the presence of existing large-scale features.

5.5.2 In para 4.24 the LVIA describes other large-scale features in the receiving landscape including settlement, the A30 and pylons. However, these features lie predominately to the south of the site and although pylons cross the site, they comprise a pylon line extending in a northwest direction and a smaller line extending northwards. Four pylons are located within or adjacent to the site and in the southern part of the site only. The northern part of the site is less affected. These features do not dominate, the wider rural characteristics of the Whitewater Valley are the prominent characteristics and experience.

² As highlighted in Hampshire Historic Landscape Characterisation

5.5.3 The LVIA concludes that the magnitude of change would be low and give rise to a minor effect on landscape character. This is considered to be an underestimation of the scale of effect which will be felt along at least 2km of the river valley and would be readily perceived from the eastern valley sides and from public rights of way across the valley. The LVIA concludes in para 4.25 that the proposed development *'would not express itself in the landscape due to its low profile and visual containment of the site'*. The LVIA concludes in para 4.30 that minor effects will occur on LCA4 Whitewater Valley and its associated landscape types. This is considered to be an underestimation for the following reasons:

- Rows of solar panels perpendicular to the valley contours would undermine and detract from the valley profile and its intimate valley scale.
- Large areas of panels and associated infrastructure would increase the perceived human influence on the landscape in this part of the valley and erode its intrinsic rural character.
- The extent of development will change the land use and appearance of field enclosures affecting land cover patterns and character of the valley sides.
- Some areas of regular abrupt edges to panels will appear out of keeping with curving contours and wavy field boundaries.
- The height of racks will prevent views across the valley when passing through the development on public rights of way.
- The extent of development on the slopes is unlikely to be significantly screened by proposed planting.
- Urbanising elements of development would appear out of place with the special qualities of the valley.
- The panels will change colour in different atmospheric conditions and may reflect the sky on a sunny day appearing blue or on a cloudy day appear grey - this may make them stand out visually.

5.5.4 Overall, significant landscape charactering effects would occur within 1km of the site and would be felt acutely within a 2km stretch of the Whitewater Valley.

6 Visual Effects

6.1.1 The visual effects of the proposed development are set out in Section 5 of the LVIA.

6.2 Viewpoints and Visualisations

6.2.1 The LVIA notes that there are no views from roads (para 5.36). This is questioned in relation to Murrell Green Road and Reading Road (B3349).

6.2.2 Judgements in the LVIA rely on the topography and vegetation of the wider landscape to conclude that the visual effects of the proposed development would be limited. Whilst this is true in terms of the effects being limited to within c. 1km of the site boundaries it is not the case regarding the significance of effects on views from within and on the margins of the Whitewater Valley, where the topography of the valley increases the visibility of the scheme and gives rise to significant visual effects due to the orientation of solar panels relative to the valley slopes.

6.2.3 Footpaths which cross the valley would be adversely affected by the proposed development for much if not all of their length within the valley. The current visual amenity afforded by footpaths 17 and 23 is of open views across and up and down the valley. The introduction of the development on the western valley sides would curtail these views limiting them to a tunnel of solar panels within the site which would be too high to see over the top of. The visual amenity afforded by these footpaths would be transformed for the duration of the development and would not be possible to mitigate to any meaningful degree.

6.2.4 Para 5.10 of the LVIA illustrates an overreliance on field boundary hedgerows and trees along the Whitewater River to screen the development. At best, this vegetation filters views but would not reduce the scale and extent of the proposed development which would be perceived from the footpaths especially where they are elevated and look west across the valley to the development.

6.2.5 The viewpoints have been reviewed and comments provided against each in the table below:

Viewpoint	Commentary
1	The evergreen trees and foreground of arable field are noted in this viewpoint as well as V/P 3. The LVIA considers the arable field to lie beyond the site but this is questioned. The evergreen trees are likely to be those south of Great Nightingales Copse and the direction of view would suggest the arable field is the rising land in the south of the site at Bunker's Hill. On this basis the proposed development will add a new uncharacteristic element to this view. Given the distance and limited extent of the view the development is likely to give rise to a low adverse effect. This is unlikely to be mitigated by the proposed planting on site.
2	From this viewpoint there are filtered views to the site in winter. Given the low elevation of the view and intervening vegetation and narrow extent of view the change is likely to be negligible.
3	As for V/P 1. The southern part of the site is visible and more of the valley sides and site would be visible in winter through the trees. The development is likely to give rise to a low adverse

	effect.
4	The photograph associated with this viewpoint fails to show the extent of the site visible nor does it discuss in the narrative the nature of the sequential views along the footpath. These views are open, elevated with the valley sides clearly perceived. There is no reference to the lines of panels which would be visible, the extent of the development (180 degrees or more). Views are close enough for other elements of the development to also be visible (fencing, CCTV, batteries and inverters etc). Effects would be significant and adverse. Mitigation is unlikely to reduce the scale of effect due to the angle and elevation of views and extent of development.
5	This viewpoint represents views from the public right of way on the valley floor and from Borough Court listed building. In winter the rising valley slopes are clearly visible though existing valley floor vegetation. The farm buildings on Bunker's Hill and barns are clearly visible from various locations within the grounds of Borough Court. The setting back of development from the river would not mitigate the visual effects of development rising up the valley slopes. The substation is also likely to be visible. The development would fill a good proportion of the view and introduce a notable new element resulting in a significant adverse effect.
6	The northern part of the site would be visible from this location. Given the distance and limited extent of development likely to be visible and given that the panels will be seen front on, the degree of effect is considered to be moderate-slight adverse.
7	No comment
8	From this location the view of the wider valley will be transformed and views curtailed within a narrow corridor of fencing and solar panels. Although hedgerow is proposed either side of the footpath this will not alter the complete transformation of views and amenity afforded by this recreational route. The effects would be major adverse and would not be possible to mitigate.
9	From this location on the valley floor the rows of solar panels will be visible rising up the valley slopes perpendicular to the contours. This view reflects only a narrow field of view but in reality the proposed development will extend c.200 degrees giving rise to perceptions of the solar farm dominating the valley scene and wrapping behind the viewer. The close proximity of the view to the site will mean that other elements of the proposed development will also be readily apparent include battery stations, fencing and CCTV. The effects would be major adverse and would not be possible to mitigate.
10	No comment

6.3 Public Rights of Way

6.3.1 The LVIA assesses the effects on Public Rights of Way 16, 17, 23 and 31. It concludes that there would be major adverse effects on PRoW 17 and 23 in the short-term reducing to moderate in the longer term. However, the proposed mitigation is unlikely to lessen the enclosing effects of the development and the loss of wide valley views. For PRoW 16 the LVIA concludes that the magnitude of

change in year 1 would be low reducing to negligible in year 5, again the effects on the route are considered to be underestimated as are the effects on PRow 31 – whilst views from the valley floor may be more filtered by vegetation it would not remove views of the development all together and from the upper slopes there are numerous views across the valley in addition to Viewpoint 4.

7 Conclusions

7.1 Additional Information/Clarifications

7.1.1 The following additional information and clarifications should be requested:

- Mapping showing the topography/contours of the site with the proposed layout of the development provided over the top.
- Additional viewpoints from the following locations (suggested views 4 and 5 listed below are appended to this report by way of example):
 1. Reading Road, Murrell Green Road
 2. Footpath 17 where it enters the site from the west near Stokes Farm
 3. Footpath 16 to the north and east of the site
 4. Footpath 31 on the eastern valley slopes looking west
 5. Footpath 23 from elevated land southeast of the site and along the south-eastern boundary of the site looking north.
- Detailed assessment of landscape value and review of landscape effects
- Request maps in Construction Traffic Management Plan which appear to be missing, and also Appendix 1 of the Planning Statement

7.2 Summary

7.2.1 Relevant policy in relation to landscape include NPPF para 170 and Hart Local Plan Policy NBE2. The latter requires proposals to *'respect and enhance, special characteristics, value or visual amenity of the District's landscape. As such, proposals will be supported where there will be no adverse impact to:*

- a) *the particular qualities identified within the relevant landscape character assessments and relevant guidance;*
- b) *the visual amenity and scenic quality of the landscapes*
- c) *historic landscapes, parks, gardens and features;*
- d) *important local, natural and historic features such as trees, woodlands, hedgerows, water features e.g. rivers and other landscape features and their function as ecological networks; and*
- e) *it does not lead to the physical or visual coalescence of settlements, or damage their separate identity, either individually or cumulatively with other existing or proposed development.'*

[emphasis added]

7.2.2 Local Plan Policies CON23 (Development affecting public rights of way), Policy NBE9 (Design) and Policy NBE10 (Renewable and Low Carbon Energy) are also relevant. The latter requires that proposed schemes need to ensure *'any adverse impacts are addressed satisfactorily.'*

7.2.3 The effects of the scheme may be geographically limited in extent, but the level of effect felt within c1km of the site boundaries and along c.2km of the Whitewater

Valley, and when using the public rights of way which cross the valley, would be significant adverse.

- 7.2.4 The layering effect of vegetation within the valley will not screen the proposed development and will at best filter some views. Given that a number of the views are across the valley from roads and PRoW and afford sequential views across and up and down the valley, it is not possible to fully mitigate the scale of development proposed. The nature of the views, especially from the east would be of rows of solar panels extending down the valley sides and would appear particularly intrusive.
- 7.2.5 This review has highlighted a number of shortcomings within the LVIA. Of particular importance are the following:
- Lack of analysis of topography of the site and layout
 - Lack of description of the Whitewater Valley as a perceived landscape unit
 - Limited analysis of landscape value, susceptibility and sensitivity
 - Omission of viewpoints which are important in understanding effects
- 7.2.6 As a result, the effects of the proposed scheme are considered to have been underestimated. The LVIA is not considered to be a fair representation of the effects of the proposed development and should not be relied upon to determine this application.

← Approximate Extent of Solar Farm →

Bunker's Hill Farm

Existing Barns

Location of
Substation

Barns at
Bartlett's Farm



Bunker's Hill Solar Farm

View from footpath 23 southeast of the site looking north

For Illustrative Purposes Only

← Approximate Extent of Solar Farm →

Allotments

Bunker's Hill Farm

Substation will appear in front of
existing barns



Bunker's Hill Solar Farm
Winter/Early Spring View from Borough Court looking west

For Illustrative Purposes Only



Approximate Extent of Solar Farm

Allotments

Bunker's Hill Farm

Existing Barns



Bunker's Hill Solar Farm

View from footpath 31 looking west to mid valley slope

For Illustrative Purposes Only

Bunker's Hill Solar Farm and Battery Stations

Comments on Heritage Statement

WVPS Introduction

The Whitewater Valley Preservation Society (WVPS) has produced the following review of the Heritage Statement submitted by Pegasus Group on behalf of JBM Solar.

The work of the WVPS in relation to this application is to reflect the relevant objects of the Society:

- 2.2 To ensure only positive development and exploitation of the Whitewater Valley through high quality, sympathetic design and sustainable infrastructures*
- 2.3 To conserve the rural nature of the Whitewater Valley for the enjoyment of this and future generations*
- 2.4 To promote the valued landscape and historic environment of the Whitewater Valley¹*

It is noted by WVPS that whilst the author's qualifications are not in dispute, the author is an employee of Pegasus Group which is part of the application team. The statement is not an independent assessment of impact.

The WVPS has produced this review mindful of the references to the historic nature of the area that contains the site.

The references below are derived from the Rotherwick Neighbourhood Plan 2016-2032.

- *It (Rotherwick) has been stated as one of the most beautiful historic villages in Hart District.*
- *Rotherwick is a quiet, rural community surrounded by farmland and ancient woodland.....In keeping with its rural character, Rotherwick has no public transportThis reflects the rural nature of the community set in its historic countryside landscape*
- *Residents and visitors particularly value the Parish's remote setting ... its open spaces and views, its Conservation Area, historic listed buildings and a network of footpaths allowing access to the surrounding countryside and woodlands.*
- *Access to the rural landscape is enabled by numerous unpaved tracks, rights of way ... used by the community and visitors.*
- *The Neighbourhood Area is crossed by a number of pathways Beyond the village, footpaths link to outlying groups of dwellings and the network of pathways includes a significant section of the long distance route the Brenda Parker Way.*

¹ Whitewater Valley Preservation Society Constitution

Further, the Hart Landscape Character Assessment identifies distinguishing characteristics of Rotherwick relevant to this Heritage Statement review.

- *a patchwork of mixed farmland*
- *a strong landscape structure of woods and hedgerows which provide a backdrop to open fields and provide views contained by these features*
- *gently undulating land-form which also helps to provide containment of views and create enclosure*

SPO1 – Sense of place – *Development proposals will be supported which maintain a strong sense of place Retaining the distinctive local character of Rotherwick Parish.*

NE04 – *Development proposals shall maintain or enhance the network of footpath and rights of way ... across the Parish... Proposals which harm the character, appearance or the use of rights of way will not be supported.*

General Introduction to Heritage Assessment

The Historic England Good Practice note (GPA3)² sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

Whilst not a statement of government policy the practice note supports national policy and is the basis for the statement commissioned by the applicant.

Statement

2. Site Description and Planning History

2.2 Planning History – the author states “*A review of Hart District Council planning records available online identified no planning history for the site*”.

WVPS Comment: The site as drawn creates a ‘V’ shape exclusion area around the buildings of Bunkers Hill Farm and the Barn at Bunkers Hill and a further island of the farm buildings in the middle of the site. Together these ‘excluded’ areas have been the subject of in the region of 39 planning applications, 34 since 1996. This point in the statement is therefore wholly misleading.

Statement

3. Methodology

3.3 Methodology – the statement notes that it has not been possible to study aerial photographs held at Historic England Archives due to its closure throughout the Covid-19 Pandemic.

WVPS Comment: We established in 5 minutes that photographs are available online via Historic England’s Britain from Above site. To evidence this we provide here the link to an aerial photograph of the area surrounding Tylney Hall

² Historic England’s Planning Note 3 (2nd Edition, 2017)

<https://www.britainfromabove.org.uk/en/image/EPW058111> indicating that aerial photography is and was available.

3.7 Site visit – the author notes that the trees were in full leaf and “*it was still possible to establish intervisibility between the site and selected designated heritage assets*”.

WVPS Comment: This statement is then reversed in later sections where it is stated that assets are not visible from the site.

Further it is noted that the author does not appear to have viewed or considered any impacts from the assets themselves – other than Bunker’s Hill Farm. All photographic and verbal input of assets and landscapes in the statement is testament to this fact.

It is the understanding of WVPS that no owner of a historic asset, other than those at Bunker’s Hill, was approached to take part in the heritage statement.

Assessment of significance

WVPS Comment: The definition of significance is correct but leaves out important definitions from GPA3.

We would draw your attention to the further definitions contained within GPA3:-

- “*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the heritage asset’s conservation*”³
- *Views, however, can of course be valued for reasons other than their contribution to heritage significance. They may, for example, be related to the appreciation of the wider landscape, where there may be little or no association with heritage assets. Landscape character and visual amenity are also related planning consideration. The assessment and management of views in the planning process may therefore be partly or wholly separate from any consideration of the significance of heritage assets.*⁴
- “*The staged approach to taking decisions on setting...can also be used to assess the contribution of a view, or views, to the significance of heritage assets and the ability to appreciate the significance.*”⁵
- “*They (local planning authorities) may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability ... thereby threatening its on-going conservation*”.

WVPS Comment: This applies to the heritage assets of The Leather Bottle Public House which could suffer economic loss due to a reduction in the attractiveness of walking and cycling in the area, similarly Borough Court which operates a high-end Bed and Breakfast and potentially Tydney Hall

³ NPPF, paragraph 132

⁴ Historic England’s Planning Note 3 (2nd Edition, 2017)

⁵ Historic England’s Planning Note 3 (2nd Edition, 2017)

(although this falls outside the valley for the purposes of any review by the WVPS).

3.9 WVPS Comment: The applicant in their Heritage Statement for Bunker's Hill Farm commences by referencing Historic England's Good Practice Advice 2 (2nd edition July 2015) referenced as GPA2. The current guidance, which itself is being reviewed, is Historic England's Planning Note 3 (2nd Edition, 2017) or GPA3. We note that the author moves to GPA3 at 3.21 but with no further reference as to why.

Setting and significance

3.16 – WVPS Comment: once again the author gives a definition of setting but not the full definition. The following extracts from GPA3 also apply.

- *"Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive ..."*⁶
- *"The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting."*⁷ **WVPS Comment:** Therefore, the impact of the proposal on those heritage assets within a reasonable distance of the site should be considered as part of the decision-making process. Furthermore *"... significance is not dependent on number of people visiting it (heritage asset)...this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting ... and the importance of the setting to a local community who may be few in number."*⁸
- *"The contribution of setting to the significance of a heritage asset ...can ...include a variety of views of, from, across, or including that asset."*⁹ **WVPS Comment:** This is key to the question of Borough Court.

Further in relation to cumulative change:

- *"Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting (e.g. the approval of industrial units at Bunkers Hill), to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or enhance, the significance of the asset"*¹⁰.

WVPS Comment: This guidance will apply to not only the views from Borough Court, Damales and Bartlett's Farm but also the assets of Bunker's Hill Farmhouse and the Barn at Bunkers Hill Farm.

Further in relation to landscape

- *"an area, as perceived by people, the character of which is the result of the action and interaction of natural or human factors"*¹¹.

⁶ Historic England's Planning Note 3 (2nd Edition, 2017)

⁷ Historic England's Planning Note 3 (2nd Edition, 2017)

⁸ Historic England's Planning Note 3 (2nd Edition, 2017)

⁹ Historic England's Planning Note 3 (2nd Edition, 2017)

¹⁰ Historic England's Planning Note 3 (2nd Edition, 2017)

¹¹ Glossary, Guidelines for Landscape and Visual Assessment, 3rd edition, Landscape Institute and the Institute of Environmental Management and Assessment

Assessing change through alteration to setting

3.19 WVPS Comment: the author now references GPA3 – as this is the latest planning advice it is unclear why the author has moved from GPA2 to GPA3 without explanation.

The author highlights the non-exhaustive checklist and mentions 5 and 8 areas in 2 points. There are in fact 17 areas which we believe should be considered and are listed below.

Different assessments should be carried out for each of the heritage assets both within and without the Zone of Visual Influence. These should take into account the degree of harm to each and the cumulative and complex impacts on the heritage assets in the area. For example if there is less of a desire to walk on the PRoW to and from Borough Court, does this impact on the heritage asset at The Leather Bottle or indeed Tylney Hall (which is included in the statement but falls outside the remit of the WVPS). Cumulative assessment has not been considered here as the proposal is not large enough to trigger an EIA.

Those areas that should be considered:-

Location and siting

- *Proximity to each heritage asset* WVPS Comment: Those within 1km of the site are listed by the applicant.
- *Proximity in relation to relevant topography and watercourses* – WVPS Comment: WVPS has sought to address this point in our separate review of the LVIA at various points including 3.1.1. and our contribution on the ecological impact.
- *Position in relation to key views to, **from and across*** WVPS Comment: The statement considers views to but not from or across.
- *Degree to which the location of the site will physically or visually isolate the assets* WVPS Comment: Not commented on by the applicant.

Form and appearance of the development

- *Prominence, dominance and conspicuousness* WVPS Comment: This area should be covered directly in the heritage statement but is left to the LVIA. As outlined in the WVPS review of the LVIA at various points including 5.4.4, 3m high solar panels on undulating land set at an angle to the topography of the existing terrain would mean that the development is prominent, dominant and conspicuous.
- *Competition with and / or distraction from the assets*
- *Dimensions, scale and massing* WVPS Comment: Not covered by the applicant's statement and logically must be covered given the size of the proposed development
- *Visual permeability (extent to which it can be seen through), reflectivity*: WVPS Comment: The author does not address this point. As per the LVIA, visual permeability would be non-existent. The existing pylons allow for acceptable permeability.
- *Materials (texture, colour, reflectiveness)* WVPS Comment: Should be addressed in relation to the impact on the historic assets. The changing colour of the panels in different atmospheric conditions is highlighted in the WVPS LVIA review at 5.5.3.
- *Diurnal and / or seasonal change* WVPS Comment: Not addressed and therefore the impact of site lights on historic settings is not considered.

Wider effects of the development

- *Change to skyline, silhouette* WVPS Comment: Not addressed by the statement. With reference to the LVIA review, with an eye height of 1.7m and

panels of up to 3m, there would be no visible skyline or silhouette from within the site and the looking towards the site the highest points would alter the skyline and create an artificial silhouette.

- *Noise, vibration, dust – even in the building period* WVPS Comment: Not addressed by the statement. WVPS lacks the required expertise in this area but it should be covered.
- *Lighting effects and light spill* WVPS Comment: Not covered and as per Diurnal impacts (above) should be covered.
- *Change to the general character of the area* WVPS Comment: Here the industrialisation of a rural area as defined by the Rotherwick Neighbourhood Plan 2016-2032.
- *Changes to public access, use or amenity.* WVPS Comment: Changes to the public footpaths are addressed in the statement. The statement makes no reference to the Brenda Parker Way.
- *Changes to land use, land cover* WVPS Comment: We refer to evidence based comment in the WVPS LVIA review.
- *Economic viability* WVPS Comment: The statement does not address the potential impact on The Leather Bottle, the stated impact on Borough Court (see landowner comment) and potentially Tylney Hall.

WVPS Comment: The author expends much of sections 3 and 4 of the statement on definitions of significance and background to government policy in relation to Listed Buildings and Conservation Areas and, separately, the desirability of sustainable development. Legislation which as outlined by the author, conflicts. Much verbiage is given to policy towards eg scheduled monuments and non-designated heritage assets background which we do not propose to address as it is largely irrelevant to this proposal.

4.35 Policy NBEB states “*proposals must be supported by a heritage statementthat demonstrates a thorough understanding of the significance of the heritage asset and its setting ...*” WVPS Comment: It is not clear from the heritage statement how the author can have a thorough understanding of significance or setting of any asset which she has not stood on the site of, or investigated the background to, from informed sources. The statement has therefore failed to reach the benchmark required other than for Bunkers Hill.

5. The Historic Environment

Previous Archaeological Works

5.4 WVPS Comment: WVPS would respectfully highlight that the absence of recorded archaeological works is not evidence of the lack of archaeological significance. As evidenced by the author, permits have only been issued where necessary for recent housing development. There is considerable evidence of the areas watercourses being of significance to the Romans. That work has not been the subject of a permit does not dismiss its significance.

Geography, Topography and Geology

5.22 mentions two pillboxes on the east side of the river WVPS Comment: There is no mention of the further pillbox below Damales and two further boxes at Borough Court and one at DogTails although it is noted that these are included in the appendix to the Statement.

5.24 WVPS Comment: There are a further three known kilns opposite the site.

Designated Heritage Assets

5.26 WVPS Comment: It is factually incorrect to describe the site as “...*having no designated heritage assets*” – see correction to 2.2 above.

6. Setting Assessment

GPA3 recommends a staged approach in the assessment of development on heritage assets and the applicant has used selected parts of this process as a framework for their statement.

Step 1 – identification of the heritage assets

The proposal references 53 heritage assets using the 1km radius. The area in which the site is proposed is heavily populated by listed heritage assets. A conservative ‘area of search’ for WVPS of 0.5kms from the site provides a list of 27 heritage assets (Addendum 1).

Within the list 10 heritage assets fall within the ‘Zone of Visual Influence’ and the remainder are within the ‘Zone of Theoretical Visibility’.

WVPS Comment: It is to be noted that the author has moved away from GPA3 at this point by not defining either assets within the Zone of Visual Influence or assets falling within the Zone of Theoretical Visibility. Whilst the Zone of Theoretical Visibility is used in the LVIA, no assets are highlighted and WVPS has made comment on the lack of clarity in the base mapping – see LVIA review at 3.1.3.

Nor does the statement mention any viewing points for assessment of the historic assets and therefore has not addressed why the viewing point was selected.

Listed Buildings

6.4 the author makes a judgement that “*it is clear that their heritage significance is derived predominantly from the special architectural and historic interest of their built form and fabric*” WVPS Comment: the author dismisses the views towards and from the assets as making a lesser contribution to their significance – but there is no evidence provided to support the statement “*it is clear that*”. This is, therefore, an unsubstantiated claim repeated at various points in the report in relation in particular to Borough Court and the Bartlett’s Farm complex.

6.5 and 6.6 WVPS Comment: It is accepted that there are no ‘designed’ views across the site from Bunkers Hill, Bunkers Hill Cottage or Bartlett’s Farm but original design is only a slight part of the consideration under GPA3. Furthermore, Damales, Bartletts, Bunkers Hill and Dogtails all formed part of the Tylney Estate at their inception. They were designed to interact with each other as working parts of the estate until the dispersal in 1926. Whilst there is no historical record, it is likely that the footpaths were derived to pass between the parts of the estate by foot and to reach the village of Rotherwick and Tylney Hall beyond. The ‘views’ are, therefore, created by the practical need to see across the estate as a group of interacting assets rather than architectural design of individual assets.

6.7 WVPS Comment: again historical visual associations are not the only consideration.

6.8 WVPS Comment: visual impact is not the only consideration.

6.9 WVPS Comment: absence of design does not equal negative impact.

6.10 WVPS Comment: the “*transient glimpses of Borough Court*” and Damales are less so when there is no foliage and are far stronger than the pictures would indicate as these are taken on the site at the furthest point from Borough Court and Damales as the footpath starts across the site. The author accepts this at 3.7 above.

If solar panels are put on the site, from the point where the photograph is taken in plate 3 a walker would not see any part of the heritage assets at Bunkers Hill, Damales, Bartletts or Borough Court. It is also to be noted that the footpath in Plate 3 would not be a straight line as would appear to be the case in this plate 3. Therefore, Borough Court would not even be visible at the end of the tunnel of solar panels. The proposal would reset the footpath to the original field boundaries and zig zag through the site / solar panels. Where the author states “*the site is evidently not a location from where they are best experienced*” that is correct, but the author fails to address the numerous other points on the footpath from where Borough Court is evident. The author also fails to address the question of the impact on the setting of Borough Court / Damales when walking from those areas as required by GPA3. The author has made no reference to the views *from* these, or any, historic assets (other than Bunker’s Hill).

WVPS has also noted the objection to the proposal by Hampshire Countryside Service and a requirement to divert footpaths 17 and 23. Were this to happen, the historic routes from Tylney, Mattingley etc across the valley would be removed forever and the damage to the settings increased.

6.11 WVPS Comment: the statement has not accurately considered the assets in the two required Zones and has therefore dismissed all historical assets other than the Bunker’s Hill and Bartletts Farm complexes. The author has therefore no need to discuss any asset further in the rest of the statement. This is an oversimplification of the process and the results of this statement cannot therefore be accurately relied upon.

Those assets that should have been within the Zone of Visual Influence can each provide both tangible and intangible association with their surroundings. Further, the contribution of the noise of the development both at the time of building and during its lifespan have not been calculated.

The assessment of the contribution to significance of a view does not depend alone on the significance of the heritage assets in the view but on the way the view allows that significance to be appreciated. For example, the significance of the 15th Century chimneys at Borough Court cannot adequately be estimated by standing at Borough Court, it is only by walking *from* Bunkers Hill that the full significance of the chimneys can be understood.

Although the author has chosen to dismiss Borough Court at Step 1, we have provided below a short description of Borough Court, one of the most historical assets in the Whitewater Valley.

Borough Court

The Grade II* listed building was first documented in AD1420 as ‘Brokecourt’. The name ‘Brokecourt’ derives from brook or stream with later corruption but showing a clear ‘design’ to link the building with the river and valley. The house formed part of the Tylney estate and was prominent in the Tudor period. The north face has 2 massive chimneys with 2 and 3 octagonal flues above rectangular bases, the middle flue having a raised spiral pattern. Of particular significance, the chimneys can best be enjoyed from a distance e.g the walk from Bunker’s Hill.¹²

¹² HER Record ID: 4077, Borough Court

Step 2 – assessment of the degree to which the settings and views make a contribution to the significance of the heritage assets or allow significance to be appreciated.

Bunker's Hill Farmhouse and Barn

WVPS Comment: The statement promotes the logic that the Bunker's Hill setting is already marred by industrial units and the layout has changed such that any development on the site would have no impact on the historical settings. WVPS would highlight GPA3 guidance that "*Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting (e.g. the approval of industrial units at Bunkers Hill), to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or enhance, the significance of the asset*". By reference to our LVIA review, WVPS would highlight that the proposed site would provide a significant further detraction to the heritage assets at Bunker's Hill.

6.25 WVPS Comment: Bunker's Hill Farmhouse is accessed by the same 'track' which is in fact a tarmac lane, as the site, and assessment of the added disturbance of works creating noise, vibration and dust, even during the building period is recommended under GPA3.

Bartlett's Farm complex

6.29 – Bartlett's Farm WVPS Comment: the author's historical description is accurate, but the author once again considers setting as 'view' this is not borne out in the guidance.

The author addresses the entire statement with reference only to views by the public from exclusively the footpaths this is not an accurate use of the guidance. To reiterate the guidance "*The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.*"¹³

Plates 10 and 11 show the views of Bartlett's farm from distance and when the trees are in full leaf – it is clear from the photographs that the trees are indeed oaks and other shedding trees.

6.38 "*the northern fields of the site are considered to make a modest contribution to the significance of the Farmhouse*" WVPS Comment: Once again WVPS would ask on what evidence this statement is made? Again, all of the assessments have been done from the outside looking in – not one has been done from the heritage asset considering the impact of the site.

6.40 – WVPS Comment: The statement "*The site is considered to make no tangible contribution to the significance of any of these assets ...*" is not borne out by the facts contained in the statement which as repeated often here is a conclusion based on looking from the site at the assets and not looking from the assets at the site. It is therefore only following a selected portion of the guidance. The conclusion cannot reasonably be relied on.

¹³ Historic England's Planning Note 3 (2nd Edition, 2017)

Additional Information

Relevant s.78 Appeals under the Town and Country Planning Act 1990

MARKUS WIERENGA (GREEN SWITCH DEVELOPMENTS LTD) AT RECTORY FARM, RECTORY LAND, UPTON WARREN, WORCESTERSHIRE APPLICATION REFERENCES: (A) W/15/01035/PN (B) 15/0387

Character and Appearance

10. The Secretary of State ... shares the Inspector's view that, for the reasons given at IR139, the proposed development would be an incongruous and alien intrusion that would be harmful to the landscape character of the area. The Secretary of State also agrees with the Inspector that the network of paths that cross the site would be dominated by the presence of the proposed development (IR145) to the extent that the enjoyment of a network of public rights of way would be significantly affected and harmed by the proposal.¹⁴

Heritage Assets

11. Having carefully considered the Inspector's reasoning at IR150-157, the Secretary of State agrees that, whilst the proposed development would not cause harm to the nearby Upton Warren Conservation Area (IR151) or be harmful to the special interest or setting of West Lodge or its barn (IR152), it would be an alien and discordant feature within the pastoral setting of the Bowling Green Farmhouse and barn (IR153-154). The Secretary of State agrees with the Inspector that, for the reasons given at IR154-157, although the harm caused to Bowling Green Farmhouse and barn would be less than substantial for the purposes of paragraph 134 of the Framework, the fact that the overall scheme would be harmful to the setting of these heritage assets and would not therefore accord with the SWDP or national policy weighs significantly against the proposal.¹⁵

Summary

1. By dint of being produced by a company within the applicants team, the Heritage Statement is not an independent study.
2. The Heritage Statement does not reference:-
 - a. The Rotherwick Neighbourhood Plan, SP01 and NE04
 - b. The Hart Landscape Character Assessment
and consequently does not reference the importance of the landscape, footpaths and historical assets to the area.
3. The site description is deceptive as the site's boundaries have been drawn round Bunker's Hill Farm and the barns and create an island of the agricultural barns on the site. This has meant that a full picture of the 'site' has not been given.
4. As a result of point 3, the description of the site as having "*no designated heritage assets*" is wholly inaccurate.
5. The full planning history was not expressed due to the 'helpful' drawing of the site's boundaries.
6. The statement recognises the "*intervisibility between the site and selected designated heritage assets*" but later concludes there is no visibility between some assets and the site?

¹⁴ MARKUS WIERENGA (GREEN SWITCH DEVELOPMENTS LTD) AT RECTORY FARM, RECTORY LAND, UPTON WARREN, WORCESTERSHIRE APPLICATION REFERENCES: (A) W/15/01035/PN (B) 15/0387

¹⁵ MARKUS WIERENGA (GREEN SWITCH DEVELOPMENTS LTD) AT RECTORY FARM, RECTORY LAND, UPTON WARREN, WORCESTERSHIRE APPLICATION REFERENCES: (A) W/15/01035/PN (B) 15/0387

7. The statement does not address the significance of the impact of the site from any asset other than Bunker's Hill.
8. Heritage asset owners were not approached as part of this assessment and no asset was, therefore, visited.
9. Edited definitions of 'significance' and 'setting' were used in the statement, including a lack of highlighting of the need for local planning authorities to consider economic damage to heritage assets. Also 'views' should include those '*of, from, across or including an asset*'. This may be due to the use by the author of older guidance GPA2 and not GPA3.
10. The statement does not consider cumulative change in relation to the requirement to consider 'further detracting' by the site even where, as with Bunker's Hill, unsympathetic development has already negatively impacted the asset.
11. The statement does not discuss that landscape as a stand-alone can be considered an historic asset.
12. The historical assets should have been divided between those in the:
 - a. Zone of Visual Influence and
 - b. Zone of Theoretical Visibility

The report does not refer to or consider either a or b.
13. The assessment of heritage significance is unsubstantiated.
14. The statement uses its own consideration to eliminate historic assets from the assessment without evidence. The impact on Borough Court was therefore not considered in the relevant steps of the assessment.
15. Where photographs of heritage assets are taken these have been taken from wholly misleading angles and only in one direction.
16. The impact of the negative development on Bunker's Hill has been considered as not significant as the asset has already been reduced by previous development. This is not the correct approach. Further detrimental impact must still be considered along with the impact of noise and pollution – even if only in the building phase.

Conclusion

The site falls within an area that both Hart and Rotherwick Parish Council recognise as having significant historical and landscape importance to the area.

The statement eliminates from consideration, without evidence, those heritage assets which are unhelpful to the statement, and in so doing reveals the statements lack of rigorous academic independence.

The statement further fails to reach the benchmark given in GPA3 of "*demonstrating a thorough understanding of the significance of the heritage asset(s) and its setting*". Not one heritage asset (other than Bunker's Hill) was visited prior to the statement and consequently not one view or setting was considered from within the curtilage of that asset.

Further, we have provided Appeal decisions by the Secretary of State where the SoS has refused permission for solar farm applications where this "*would be harmful to the setting of... heritage assets*" as would be the case to a number of important heritage assets.

For these reasons the WVPS would respectfully submit that the Heritage Statement cannot be relied upon as a rigorous or accurate assessment of the impact of the proposal on the heritage assets or the landscape when considering the landscape as a historical asset.

The WVPS view is that the negative impact on the heritage assets both built and landscape would have a considerable and lasting negative impact on the Whitewater Valley and therefore the enjoyment of the valley by both residents and visitors.

Appendix 1

Listed Heritage Assets within 0.5kms of the proposed site

Property Name	Grade	UID
Hadley Dene House	II	1244541
Kilns at Hadley Dene House	II	1272316
White House Farm, Granary	II	1244542
Borough Court	II*	1339893
Bunker's Hill Farmhouse	II	1272278
Barn at Bunker's Hill Farm	II	1244618
Bunker's Hill Cottage	II	1244634
Damales House	II	1242762
Stokers	II	1244620
Barn at Cowfold Farm	II	1244533
Cowfold Farmhouse	II	1244532
Cartshed at Cowfold Farm	II	1272325
Shed at Cowfold Farm	II	1244535
Barn at Cowfold Farm	II	1244534
Mattingley Post Office	II	1244619
Granary at Bartlett's Farm	II	1244617
Barn at Bartlett's Farm	II	1244616
Bartlett's Farmhouse	II	1244615
Cartshed at Bartlett's Farm	II	1272277
Leather Bottle Public House	II	1092215

Post Cottage	II	1092268
White Knights Farmhouse	II	1092269
Dipley Grange	II	1092321
Barn at Dipley Grange	II	1116874
Priors Farmhouse	II	1339889
Granary at Priors Farm	II	1092216
Moorcocks	II	1272223

Bunker's Hill Solar Farm and Battery Stations

Comments on Ecological Appraisal

Summary – Ecology

- WVPS assessment shows that there will be a negative impact on protected, indicator and notable species, including dormice, bats and birds such as skylarks, linnet and lapwing, and aquatic invertebrates.
- By failing to conserve and enhance biodiversity, contravenes Hart Local Plan 2032 policy NBE4.
- By failing to protect and enhance the River Whitewater to assist in the achievement of Good Ecological Status, contravenes policy NBE6.

Relevant Hart Local Plan 2032 policies

Policy NBE 4 Biodiversity

In order to conserve and enhance biodiversity, new development will be permitted provided:

a) It will not have an adverse effect on the integrity of an international, national or locally designated site including the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSIs), Sites of Importance for Nature Conservation (SINCs) and National and Local Nature Reserves (NNRs and LNRs). The level of protection afforded to these sites is commensurate with their status within this hierarchy and gives appropriate weight to their importance and contribution to wider ecological networks.

b) It does not result in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;

c) Opportunities to protect and enhance biodiversity and contribute to wildlife and habitat connectivity are taken where possible, including the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations. All development proposals will be expected to avoid negative impacts on existing biodiversity and provide a net gain where possible.

If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, or, in the case of European Protected sites does not comply with the Conservation of Habitats and Species Regulations 2017, then planning permission will be refused.

Policy NBE6 Water Quality

Development will be required to protect the quality of the District's water environment, and where possible contribute towards improvements that are necessary to meet statutory requirements for water quality. Development will be supported provided that:

- a) it would not deteriorate the individual element band status of the District's waterbodies²⁶ or prevent the waterbodies from achieving 'good' ecological status;
- b) it would help to protect and, where possible, enhance the quality of groundwater and surface water features;
- c) any adverse impacts on local water bodies would be fully mitigated; and
- d) it incorporates sustainable drainage systems where appropriate.

Water Quality

The River Whitewater is a main river, which is a rare and important chalkstream environment, one of only around 200 chalk streams globally. It is a Site of Interest to Nature Conservation (SINC) throughout its length and includes stretches of Sites of Special Scientific Interest (SSSI).

According to the Environment Agency data published in September 2020 just 14% of England's rivers meet the criteria for 'Good Ecological Status', the same percentage as in 2016. This includes, the River Whitewater¹⁶, which is currently failing to meet 'Good Ecological Status' as required under the Water Framework Directive. As population growth, land use and climate change are having a significant impact on our water environment, the data shows we are at a stand still in progress towards achieving good ecological status.

The River Whitewater runs along and close to the east boundary of this solar farm site. Natural England¹⁷ states that drainage from utility scale solar farms sites such as this could lead to deterioration in water quality and changes to water quantity particularly through construction impacts (e.g. from dust, spillages, polluted runoff etc) and discharges to the protected river habitats. Given that the River Whitewater is designated for its unique water quality and chemistry this implies that surface water discharge could impact on the already failing / poor water quality.

In order to mitigate these adverse effects and make the development acceptable, and in line with Natural England advice elsewhere, WVPS requests that a drainage design should be submitted and agreed with Hart District Council if this application were to proceed. This should include evidence to show that the proposals will ensure there will be no deterioration in water quality, or changes to water quantity, in discharges from the site.

Aquatic Invertebrates

The above findings on water quality are supported by three years of Riverfly surveys, commissioned by the Whitewater Valley Preservation Society from Salmon & Trout Conservation, the results of which are published on our website¹⁸.

Its summary of their findings says:

"The Salmon & Trout Conservation (S&TC) Riverfly Census on the Whitewater has revealed that ecologically the river is in crisis. The River Whitewater is a chalkstream, one of only about 200 in the world. Overall, the most significant water quality pressure was indicated to be sediment, but nutrient and chemical pressure was also concerning in places. Our findings indicated Holdshott Farm to be the healthiest site, although sediment, chemical and nutrient stress was still exhibited here."

A review of the potential ecological impacts of ground mounted photovoltaic solar panels by BSG Ecology¹⁹ showed that aquatic invertebrates are attracted to horizontally polarised light, as reflected from both waterbodies and solar panels, and use this as stimulus to induce egg laying. White gridding and anti reflective coatings were found to decrease the attraction of some invertebrate species to solar panels. Anti reflective coatings were not found to deter all invertebrate species - namely, Mayflies, and Midges - under all conditions. BSG Ecology concludes it follows that it is important to site solar farms away from important and sensitive aquatic invertebrate populations. This research is not referred to by the Council's Ecology Officer.

¹⁶ Environment Agency data, published 17 September 2020

<https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039017240>

¹⁷ Although it has not yet responded to this application, Natural England, commented on the EIA Screening application (20/02632/EIA) for an almost identical utility scale solar farm nearby.

¹⁸ <https://www.whitewatervalley.org.uk/riverfly-census-on-the-whitewater/>

¹⁹ BSG Ecology, April, 2019. Potential ecological impacts of ground mounted photovoltaic solar panels. An introduction and literature review. <https://www.bsg-ecology.com/wp-content/uploads/2019/04/Solar-Panels-and-Wildlife-Review-2019.pdf>

Birds

The site is within 10 km of two sites of European designation, both of which are part of Thames Basin Heaths Special Protection Area and Species Area of Conservation. These sites are designated for Nightjar, Woodlark and Dartford warbler species. The Hazeley Heath SSSI and the Hook Common and Bartley Heath SSSIs are within 2km of the site.

The Breeding Bird Survey recorded several notable species, including skylarks, linnet and lapwing breeding, on the site. Skylarks in particular require an 'open sky' habitat, which be curtailed by this development. The enhancement of field margins – claimed as a benefit in this application - could be achieved better without this development.

Bats

The bat activity and surveys recorded Common Pipistrelle, Soprano pipistrelle, Noctule, Serotine, Myotis spp. and Brown long-eared bats. The site is considered of local ecological importance for bats. Although it has not responded to this application, Natural England, commenting on the EIA Screening application (20/02632/EIA) for an almost identical utility scale solar farm nearby (and a similar distance away from Greywell) states: *There is particular potential for adverse effects on the Greywell Tunnel (Basingstoke Canal) SSSI, as the development would potentially impact on commuting and foraging routes for bat species utilising the tunnel for roosting ...*

The Council's Ecology Officer for that EIA also advised that the proposed utility scale solar farm of this size has potential to impact commuting and foraging bats, quoting the Natural England review²⁰ of evidence of the impact of solar farms on birds, bats and general ecology.

For this application, the Council's Ecology Officer requires a lighting strategy, which must ensure there is no light spill on the hedgerows and monitoring of bat activity on the site should be undertaken.

Dormice

The MAGIC database - which provides geographical information about the natural environment across government - shows that there is a European Protected Species licence for Hazel Dormouse within 1.5 kilometres. This indicates that Hazel Dormouse is present locally; however this species has not been considered in this application. The ecology officer requires more information on the likely presence of dormouse and an assessment of any potential impact from the proposed development. Standing advice from Natural England is that this information is required prior to the application being determined. For this reason, we object to this application being determined in the face of the lack of this information.

Biodiversity Net Gain

The Ecological Appraisal produced by Tyler Grange includes a Biodiversity Net Gain assessment, calculated via the much criticised DEFRA 2.0 algorithm²¹. The Whitewater Valley Preservation Society does not share the Ecology Officer's confidence that this biodiversity net gain calculation "seems to be realistic", for the following reasons:

- The establishment of perennial chalk grassland with wildflowers, as described, is notoriously difficult. Success requires poor soil, not Grade 3 b land which has been in agricultural use and thus regularly fertilised. The supplier of the EM2 seed mix advises planting on ground that is not highly fertile. On fertile

²⁰ Natural England. Evidence review of the impact of solar farms on birds, bats and general ecology (NEER012) 1st edition - 9th March 2017

<http://publications.naturalengland.org.uk/file/6000213410447360>

²¹ <https://www.endsreport.com/article/1675423/why-natural-englands-net-gain-calculator-may-struggle-accurately-value-nature>

ground, such as this site, even slow growing grasses as proposed and any enduring weeds will outperform the 20% of wildflowers provided in this mix, rendering it of negligible benefit in supporting biodiversity improvement. The management required to cut, clear cuttings and dig out any perennial weeds as advised by the seed supplier does not appear to be acknowledged. Thus the apparent 12 Ha of wildflower meadow, while only 17% of the site, are likely to end up as rough grass or scrub with little resultant improvement in the biodiversity.

- The theoretical calculation of impact on biodiversity refers only to effects on the site itself. As outlined above, and the Hazeley Heath SSSI and the Hook Common and Bartley Heath SSSIs (within 2km of the site) and the Basingstoke Canal (Greywell Tunnel) SSSI and SINC of the River Whitewater adjacent to the site are where the negative biodiversity and ecological impacts of this development will be felt. These protected areas have not been taken into account in the biodiversity calculation.

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