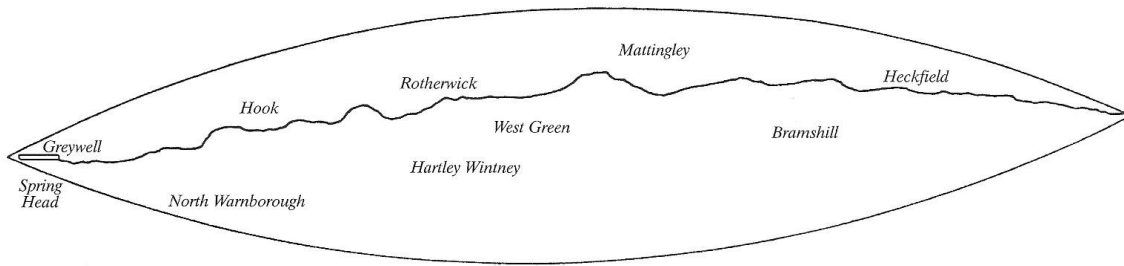


The Whitewater Valley Preservation Society



14th May, 2021

Dear Mr Moorhouse,

20/03185/FUL

Erection of a Solar Photovoltaic Farm with an output capacity not to exceed 49.9MW of energy, with associated battery storage and supporting infrastructure including inverters and a transformer, fencing, CCTV installation and landscaping works

Chosley Farm Bidden Road North Warnborough Hook Hampshire RG29 1BW

The Whitewater Valley Preservation Society (WVPS) has considered the amended plans and stands by its original objection. We have the following comments to make in response to some of the recent information provided by the applicant.

Landscape and Visual Impact

View from the Greywell Conservation Area

Applicant's claims that the site will not be visible from Greywell Conservation Area are incorrect and it is also incorrect that the low height of the vegetation along the Bidden Road will conceal the major part of the site. The Greywell CA rises behind The Street, and is crossed with much used footpaths, from where the view of the hill of panels will be all too clear.

The term "barely visible" used by the applicant understates the case.

Up Nately

To claim that visibility of the site will be of colour and contrast with the other fields understates the acknowledged dark colour and reflective surface and industrial appearance which the installation will display. It is incorrect to claim this will be an unobtrusive change or contrast with cultivated fields.

Three Castles Path

The applicant acknowledges the high sensitivity of this historical route but attempts to diminish the detrimental impact of the proposed installation by claiming a narrow window of visibility of 15%. This clearly ignores the fact that the comparison between vegetation and agricultural landscape is sufficiently significant that even 15% damages the view of the receptor.

Alton Road.

The applicant uses the term main road and claims a negative influence of traffic. It should be noted that this is the B3349.

Whilst acknowledging that the high point of the site will be clearly visible although claims that the arrays are below the horizon overlooks the proposed height of the panels up to 10 ft indicating a mixed view of supporting structures, **cabins** which are clearly industrial in nature and will obscure the existing field hedges.

SC32 Footpath Odiham 1

To call the site denuded with an exposed character is quite misleading. This is a high quality arable downland landscape with long views across the Whitewater Valley.

SC31

Failure to identify the manner in which the quiet Bidden Rd provides the significant views and perception of the valley of the River Whitewater and to claim that the view has zero importance shows how little value can be placed upon the applicant's assessments when compared with the reality. Walkers and cyclist as well as other travellers all have ample time to enjoy these views. Yet minimal mitigation is offered. The extent of the impact from 8 is so damaging because from the rising road almost the entire site is visible stretching to the horizon at The Firs and spanning from south east through east and round to north including the Whitewater Valley and at this point the solar farm will impact 50% of the 135° view of the landscape.

General observations

BRE's Planning guidance for the development of large scale ground mounted solar PV, page 5 makes clear that ground mounted solar pv projects should avoid the use of the best and most versatile crop land where possible. It further states that "Land selected should aim to avoid affecting the visual aspect of landscapes, maintain the natural beauty and should be predominantly flat, well screened by hedges, tree lines, etc"

Recent appeal dismissals have shown that lack of specific landscape designation does not necessarily allow solar farms to be installed when, as in this case, the natural beauty of a river valley and its sloping sides leading up to a well-known high spot should mean refusal.

Planning policy

The debate about NBE 2 and 10 show that the applicant must demonstrate either no adverse impact or at a minimum that mitigation has been satisfactorily achieved. Having decided against general advice to select a hill-top site the applicant has failed to recognise that satisfactory mitigation and the minimisation of impact is virtually impossible on this site. Unsurprisingly although convincing themselves, the applicant's efforts at mitigation have failed, as we have demonstrated in our initial and in this response.

FLOOD RISK ASSESSMENT AND DRAINAGE STRATEGY

WVPS wishes to re-iterate the comments in our original objection which are in strong support of the concerns expressed by the Flood and Water Management Team of Hampshire County Council and Natural England our concern that the true risks to the River Whitewater and associated Greywell Fen from the planned development

have not been properly assessed and analysed. The water flow from the site already has a direct connection bringing silt into the headwaters of the river via Ford Farm, South Warnborough and across the Bidden Road, the photographs below show an example from February 2020.

To rely on conditions only, even if they are required before construction commences, poses the certainty that the impacts will further degrade an ecology which already fails to meet the required ecological standards. We therefore believe that the only safe approach would be to request full infiltration testing of the site as specified by Hampshire CC, who have re-iterated the difficulty of understanding the real impact of the proposals on surface water management and flood risk without adequate investigation, as a necessary part of the application process, not of any post-determination condition.





Ecological Mitigation

Once again the applicant addresses only “on site” impact in the Greywell Tunnel (Basingstoke Canal) SSSI.

As pointed out in our original comments, Natural England have commented that there is particular potential for adverse effects on the on nationally important bat populations at Greywell Tunnel (Basingstoke Canal) SSSI as the development would potentially impact on commuting and foraging routes for bat species utilising the tunnel for roosting. This comment was made elsewhere (Natural England review of evidence of the impact of solar farms on birds, bats and general ecology and the EIA screening for the solar farm at Long Sutton) – but not on this application, which is much nearer and in the same valley as the Basingstoke Canal at Greywell Tunnel.

In response to the Ecologist’s comments on the complete lack of bat activity surveys, the applicant has now indicated that they have now programmed bat activity transects and static monitoring for spring, summer and autumn this year. For this reason, we do not believe this application can be decided until these essential bat activity surveys have been conducted.

For the reasons above, added to our original comments, WVPS can see no basis upon which this application should be approved and asks you to refuse permission.

Yours sincerely,

John Fleming

WVPS Committee Member, on behalf of WVPS

ⁱ 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>