

Ms Bron Curtis,
Planning Officer,
Babergh Mid Suffolk District Council,
Endeavour House,
Ipswich,
IP1 2BX

23 January 2024

Dear Ms Curtis

**DC/23/05656 Full Planning Application - Construction of a solar farm (up to 40MW export capacity) with ancillary infrastructure and cabling, DNO substation, customer substation and construction of new and altered vehicular accesses
Land At Grove Farm and Land East of the railway line, Bentley**

1.0 Summary

1.1 I write on behalf of the Suffolk Preservation Society (SPS) to object to the proposal for a 40MW solar farm on a 41.7-hectare greenfield site in the open countryside just outside the village of Bentley, on the Shotley Peninsular. The site lies to the north of the village, and is in a remote location set either side of the lane leading to the parish church and Commonwealth Graves. The site forms part of the Suffolk Coast and Heaths Additional Project Area.

1.2 The northern part of the parish, of which this site forms a part, has been identified in the Joint Local Plan as a Valued Landscape due to its intact historic patterns of settlement, ancient woodland, remnant parkland and rural lanes. The character of the location is tranquil, deeply rural, wooded and unspoilt. Accordingly, the SPS objects to the introduction of a large-scale industrial development in the form of a commercial solar farm and DNO substation which will result in demonstrable harm to a Valued Landscape, industrialisation of the wider setting of grade II* listed St Mary's Church, and the loss of highly graded agricultural land.

1.3 Whilst SPS recognises the need to increase renewable energy generation, including solar, in the context of transition towards a zero-carbon energy system, it is well recognised in policy and planning guidance that schemes are required to take full and proper account of our natural environment, landscape, local amenity, and the views and concerns of local communities. To this end, SPS calls for the use of brownfield land, rooftops and other previously developed land to be prioritized for large scale solar schemes over high quality greenfield sites in sensitive landscapes.

1. 4 Where greenfield sites are proposed we urge that best practice as set out in the PPG (Paragraph: 013 Reference ID: 5-013-20150327) is followed, namely that schemes are
(i) selected to avoid designated and valued landscapes

- (ii) integrated effectively with the topography of the site and other natural landforms so as to minimise visual impact and heritage harm.
- (iii) restricted to the lowest soil quality sites

Accordingly, we object to this application and wish to make the following comments:

2.0. Landscape and visual impact on a Valued Landscape

2.1 The application site is within the Coast and Heaths AONB (now National Landscape) Additional Project Area which the Joint Local Plan Part 1 (November 2023) defines as a Valued Landscape. The Coast and Heaths Additional Project Area contains special qualities with similar Landscape characteristics to the AONBs. The Valued Landscape Assessment for the Coast and Heaths Project Area (March 2020) sets out the special qualities of the area (see previous section). The Assessment makes clear that the Shotley Peninsular landscape retains important remnants of ancient woodland and rural sinuous lanes, such as the application site, and concludes that *Conserving and enhancing the special qualities articulated in this report is a key aspiration of the Suffolk Coast and Heaths AONB Management Plan*. The Assessment deals with the application site as part of Area 1 (the Western Wooded Plateau) at page 18, recording the following special qualities:

- Hall/church complexes along with ancient woodland and rural lanes reflect patterns of the medieval landscape.
- Remnant areas of parkland and notable veteran trees throughout area impart an established character.
- Sinuous lanes and patterns created by wavy edges to ancient woodland, rural winding lanes and old park boundaries and enclosure patterns.
- Wooded skylines defined by ancient woodlands and highly valued for biodiversity.
- Attractive open views across rural farmland to individual or clusters of vernacular buildings. **These qualities are particularly well expressed in the following geographical areas: Around Bentley Hall and Church and Northern half of the area extending into Belstead Brook Valley.** (my emphasis)

Accordingly, this location is of high sensitivity and the proposed development will have significant impacts upon the character of the area and sense of place.

2.2 The site is located within the Ancient Estate Farmland (central portion of site) and Rolling Valley Farmland (eastern portion of site) with a small strip to the western boundary classified as Wooded Estate Clayland. The character of the application site is one of a deeply rural, settled and tranquil ancient landscape, distinctive by virtue of its hedgerows, veteran trees and listed buildings. Visibility is high as a result of intermittent tree cover, with some long views across Church Lane, Grove Road and Potash Lane. The area has a strongly unified landscape pattern with a strong sense of tranquillity. The proposed development would introduce an alien and industrialising character which would cause demonstrable harm to the Valued Landscape.

3.0 Harm to the setting of Heritage Assets

3.1 St Mary's church is a grade II* listed building, set at the end of Church Road. A site visit reveals, even in mid-winter, that there is no intervisibility from within the churchyard. However, from Potash Lane and from within the site there are clear views of the church tower. This isolated church can only be accessed from the main settlement of Bentley to the south via Church Lane, and it is necessary to pass the site, which is located on either side of the road. This will result in harm to the wider setting of the church, changing from deeply rural to an industrialised site.

3.2 Although the LVIA shows that at year 10, the hedges will have grown up to largely obscure the development, the residual harm to the wider setting of the church, will nevertheless be significant during that first decade. While the harm to the church will be less than substantial, the NPPF requires that all harm to heritage assets require clear and convincing justification, and must be weighed against the public benefits.

3.3 SPS considers that the public benefit of this relatively small commercial scheme (40MW) will not make a sufficiently material contribution to the climate change emergency to outweigh the identified harm, and therefore the public benefit should be given limited weight in the balancing exercise.

3.4 We are aware that the Bentley Neighbourhood Plan also identifies a number of Non-Designated Heritage Assets in the vicinity of the site which will, to varying degrees, have their setting impacted by the development. These include: Red Cottage, Potash Cottages, Falstaff Manor, Uplands, Little House, Glebe Cottage, Bentley House, Grove Farm, Church Farm and Engry Wood. This matter should also be given weight in the balancing exercise, in accordance with para 209 of the NPPF.

3.5 Finally, we note the views of the council's own heritage officer that there will be a level of less than substantial harm to a variety of designated and non-designated heritage assets. The SPS therefore, would direct you to para. 199 of the NPPF: *When considering the impact of a proposed development on the significance of a designated heritage asset, that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

4.0 Loss of Best and Most Versatile land

4.1 According to the applicant, approximately two thirds of the application site consist of the higher grade of agricultural land with: 7% grade 2 land, 56% consists of grade 3A land while only 37% of the site consists of grade 3b land. SPS consistently objects to the use of highest quality agricultural and in favour of previously developed lands for commercial solar schemes. SPS supports the use of brownfield or less highly graded farmland and rejects the criteria which led to the site selection which is predicated simply on a grid connection and a willing landowner. This approach fundamentally undermines the planning process.

5.0 Impact on PROWs

5.1 The site is bounded by a number of footpaths to the north (Footpath 2), south east (Footpath 21), south (Footpath 40) and west (Footpath 65). Cumulatively the proposed development of 3m high panels, 4 km of security fencing, 3m CCTV masts and security lighting, together with noise from the inverters, transformers and two substations will impact upon the amenity of residents, walkers, tourists and all those using this network of ancient footpaths and bridleways. Notwithstanding the proposed mitigation of gapping up missing hedgerows, the kinetic experience when moving through this ancient landscape will be materially impacted.

5.2 The scale of the proposals, as well as the height and layout of serried ranks of metal and black hard surfaces, long uninterrupted lengths of fencing, with poles carrying CCTV will combine to transform the landscape for those living nearby and those experiencing the landscape using the PROWs or travelling along the road network.

5.3 The proposals will therefore fundamentally alter the sense of place. Whilst we note that the proposed use of the existing field pattern, setbacks and enhanced planting will go some way to screening the solar panels and associated infrastructure, it nevertheless remains the case that far-reaching views across the landscape will be lost and that the proposals will have an adverse, impact on the character and appearance of the local landscape. In particular, the wooded backdrop of Engry Wood in long views across the site will be interrupted by industrial development.

6.0. Policy considerations

6.1 The NPPF states that all communities have a responsibility to help increase the use and supply of green energy. The planning system must support the transition to a low carbon future in a changing climate and support renewable and low carbon energy and associated infrastructure (NPPF para 157). However, when determining planning applications for renewable and low carbon development, local planning authorities should only approve the application if its impacts are (or can be made) acceptable (NPPF para. 163b).

6.2 The revised NPPF (Dec 2023) gives greater protection to agricultural land through additional reference to the need to address food production, maintaining the emphasis on best and most versatile (BMV) land at para 180b which states that in the decision making process it is necessary to *recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; (my emphasis)*

6.3 The Planning Practice Guidance (NPPG) on Renewables and Low Carbon Energy (2013, revised 2015)) also makes clear that the need for renewable energy does not automatically override environmental protections and the planning concerns of local communities (para 003). It clearly states that large scale solar should preferably be sited on previously developed land, and where greenfield sites are proposed they should continue in a form of cultivation or provide high levels of biodiversity net gain (para 013). In summary the NPPG states that:

- (i) in considering planning applications, local topography is an important factor in assessing whether large scale solar farms could have a damaging effect on landscape (para 007)
- (ii) That the impact can be as great in predominantly flat landscapes as in hilly or mountainous areas (para 007)
- (iii) That great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting (para 013)
- (iv) That local amenity is an important consideration which should be given proper weight in planning decisions (para 007)
- (v) development within the setting of AONBs must take into account the importance contribution that setting makes and poorly located development can result in significant harm (para 42)

6.4 The Babergh Mid Suffolk Local Plan Policy Policy (December 2023) has a number of relevant policies that have a strong bearing in this case:

6.4.1 Policy LP25 Energy Sources, Storage and Distribution states that renewable and low carbon energy generating proposals will be supported subject to the impact on (but not limited to) landscape, heritage, residential amenity and the local community having been fully taken into consideration and where appropriate, effectively mitigated. LP25 continues at section 3: *Where proposals for renewable and low carbon energy impact on nature conservation sites, the Areas of Outstanding Natural Beauty, or the setting of heritage assets (including conservation areas), the applicant must be able to convincingly demonstrate that potential harm resultant from development can be effectively mitigated and that there are no alternative sites available within the district or for community initiatives within the area which it is intended to serve. This includes providing underground power lines and cabling.*

6.4.2 Policy LP17 Landscape states that *to conserve and enhance landscape character development must:*

- a. *Integrate with the existing landscape character of the area and reinforce the local distinctiveness and identity of individual settlements;*
- b. *Be sensitive to the landscape and visual amenity impacts (including on dark skies and tranquil areas) on the natural environment and built character; and*
- c. *Consider the topographical cumulative impact on landscape sensitivity.*

6.4.3 Policy LP18 Area of Outstanding Natural Beauty states that development within the AONB Project Areas should have regard to the relevant Valued Landscape Assessment (Alison Farmer 2020). This document identifies renewables as a threat to the landscape character of the Project Area and under the heading; Value and Significance, it identifies the following qualities:

- *Historic narrow, winding, rural back lanes with an eclectic mix of housing styles within the village.*
- *Areas of ancient woodland creating wooded horizons and backdrops in the setting of the village.*
- *Deeply rural, high-quality countryside especially to the north of the Parish and in the Samford Valley to the south.*

- *Mature veteran oaks in hedgerows, along lanes and in remnant parkland add mature character to parts of the village.*
- *Subtle variations in topography on the edge of the settlement reinforce its location on the fringes of the Samford Valley and add interest.*
- *Soft vegetated edges to village with glimpsed views to properties reinforcing rural character*

6.4.5 Policy LP19(4) The Historic Environment states that *the Councils will have regard (or special regard consistent with the Councils' statutory duties) where appropriate to the historic environment and take account of the contribution any designated or non-designated heritage assets make to the character of the area and its sense of place. All designated and non-designated heritage assets must be preserved, enhanced or conserved in accordance with statutory tests and their significance, including consideration of any contribution made to that significance by their setting.*

6.4.6 Finally, the supporting text to Policy LP20 in paragraph 15.28 states that protection relates to land within the setting of the AONBs as well as the AONBs and sets out *The protection of AONB's is not just the land within the designation, but also to its setting. In line with The National Planning Policy Framework great weight is given to conserving and enhancing the landscape and scenic beauty in the AONB and the conservation and enhancement of wildlife and cultural heritage are important considerations.*

6.5 It is clear that the proposed 40MW commercial solar farm with substation does not meet these stringent and numerous policy requirements. The proposals have a significant adverse effect on landscape character and setting of heritage assets contrary to the provisions of the newly adopted Local Plan.

7.0 Conclusion

7.1 SPS considers that the proposals are of a scale and character that will result in unacceptable impacts to a Valued Landscape, cause heritage harm, require the loss of best and most versatile land and a loss of amenity for those living and walking through this landscape. Furthermore, the proposals are contrary to both national and local planning policy and guidance as set out above. Accordingly, SPS objects to the application for the above sound planning reasons set out above.

7.2 We trust that you find these comments helpful in the consideration of this case and request that we are consulted on any future matters relating to this application.

Yours sincerely,

Fiona Cairns IHBC MRTPI
Director

Cc Ward Councillors
MSDSC Conservation Officer, Ms Lucy Birch
Bentley Parish Council