



Case Officer Robert Moorhouse

5th April 2021

21/00552/FUL Bunkers Hill Farm, Reading Road, Rotherwick.

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

**COMMENTS FROM MATTINGLEY PARISH COUNCIL**

This proposal is for a solar photovoltaic farm of c250 acres with a capacity of 49.9MWs. The applicant states that, without Government subsidy, sites on this scale are needed to be economically viable.

The need for urgent action to protect the natural environment is evident to all and recognised in the Hart declared Climate Emergency.

In this context it is notable that the majority of those responding are generally in support of delivering environmental benefit, but are opposed to this proposal. The same can be said for commentators on proposals for solar farms at Chosley Farm and nearby Ford Farm (EIA required) which are on a similar scale to Bunkers Hill.

Available evidence would indicate that these solar farm proposals – on this scale and as currently envisaged – are inappropriate for their proposed locations. The industrial nature and size is dominating and detrimental in sensitive rural landscapes. This is particularly the case adjacent to settlements where the amenity value of the landscape and long views – here across the river valley – and the rural sense of place, are so important. Comparing existing local solar projects in Winchfield these are a fraction of the size of the current proposals.

In the 'Statement of Community Involvement', Pegasus justifies by stating: 'The proposed development seeks to make an effective use of the site.' In this context 'effective' is considered only in terms of MW generation, it is not recognising environmental, biodiversity and amenity uses as 'effective use of land' as described by the NPPF – Part 11 – 118(b).

To consider, as per Local Plan Policy NBE10: 'f. the degree to which the developer has demonstrated any wider environmental, economic and social benefits of a scheme as well as how any adverse impacts have been minimised.'

The developer has not appeared willing to consider the wider value to the proposal of apportioning more land for other use, for 'wider environmental... and social benefits' – beyond a minimum of 'buffer' zones and the small areas to the South East of the site by the river. These are welcome but insufficient to mitigate the proposed harm to landscape and amenity – and fail to capitalise on the potential to further benefit wildlife and biodiversity.

Policy NBE2 Landscape requires that:

'Development proposals must respect and wherever possible enhance the special characteristics, value or visual amenity of the District's landscapes. Development 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 landscape;
- d) important local, natural & historic features such as trees, woodlands, hedgerows, water features eg rivers, & other landscape features and their function as ecological networks...'

Policy NBE9 Design requires that

'All developments should seek to achieve a high quality design and positively contribute to the overall appearance of the local area. Development will be supported where...

- a) it promotes, reflects and incorporates the distinctive qualities of its surroundings in terms of the proposed scale, density, mass and height of development.'

*continued....*

It is hard to see how the scale and density and industrial nature of the solar farm as proposed can comply with these Policy requirements.

It is possible that reducing the area covered by panels, and increasing land areas to promote wildlife and retain some measure of visual amenity, may make solar generation acceptable in this landscape. If it is not economic for the applicant to achieve this, then the scheme cannot respect the special characteristics, value or visual amenity of the landscape.

To mention that the Tyler Grange's 'Ecological Appraisal' notes the presence of and potential for impact on birds, and on lapwing and skylarks in particular:

'4.22. Approximately 10 of the probable skylark territories are within the areas where PV panels are proposed, and four are within the grassland in the southern and eastern sections of the site which will be retained and managed as a meadow. The one pair of lapwing observed during the first visit was in the arable field in the northern section of the site, also in an area where PV panels will be installed.

'4.24. In the absence of mitigation, the development may reduce the number of skylark nesting territories within the site. Mitigation measures in the south eastern section of the site to improve conditions for nesting skylark and lapwing...'

Provision only in the small south-eastern section is insufficient. Mitigation is needed by providing areas of land suitable for these ground nesting birds of open habitat – ie without panels – across the site. A detrimental impact on these bird species recorded as in national decline must be avoided.

Also to note that the 'Ecological Appraisal' at 5.10. concludes that:

'Given the limited space available on-site and the proposed landscaping, off-site mitigation will be required to compensate for the loss of woodland.'

It's not clear what this refers to, but off-site mitigation should not be considered when on-site mitigation could bring much added benefit.

The Whitewater Valley Landscape Character assessment includes the following 'main enhancement priorities':

- '- Management of existing woodlands, hedgerows and trees to secure their long-term presence within the landscape and maximise their landscape and ecological value
- '- new planting of woods, hedgerows and trees to form a stronger landscape structure in denuded valley side areas and where roads or power lines cross the valley
- '- planting of willows and other appropriate species alongside watercourses within the valley floor where the typically intimate, riparian character of the floodplain has been weakened
- '- where possible, creation of a more diverse range of wetland habitats within the valley floor, including wet grasslands, seasonally flooded areas, marshes and wet woodland.'

Should the application be in some form approved, it is noted that a 'Landscape and Ecological Management Plan (LEMP)' is a matter for condition, and could usefully be adapted to address these 'enhancement priorities'. The 'Ecological Appraisal' does provide recommendations for ecological improvements – including improvements for reptiles and amphibians and 'enhancement of current ponds present on-site' (four and one adjacent).

In response to the October 2020 developer consultation Mattingley Parish Council put forward particular requests for habitat improvement (attached as Appendix I). This was compiled in consultation with HIWWT and asked for 'Best Practice for solar farms'. Considering the focus now on Environmental Land Management schemes (ELMS), Nature Recovery and Landscape Recovery are topical considerations. This is agricultural land: would it not be possible as per the Government ELMS to put aside more land for wildlife habitat without panels? This would then accord with the consideration of NBE10 (f) the degree to which the developer has demonstrated any wider environmental, economic and social benefits of a scheme as well as how any adverse impacts have been minimised.'

Susan Turner

Clerk to Mattingley Parish Council

## APPENDIX I

23rd October 2020

### BUNKER'S HILL SOLAR FARM DEVELOPMENT PROPOSAL COMMENTS TO THE CONSULTATION FROM MATTINGLEY PARISH COUNCIL

#### 1. THE WHITEWATER VALLEY

The River Whitewater is a chalk stream, internationally a rare, valuable and fragile habitat, home to a diversity of wildlife and priority species. The Valley environment is at the heart of wildlife corridors between the river ecosystems, fields and hedgerows, and adjacent ancient woodland.

The consultation map has considered national designations, but please also consider local wildlife sites. As per the Whitewater Valley Preservation Society website, the Water Framework Directive identifies the river as a main water body and a Site of Importance for Nature Conservation (SINC).

Forty years of stable land and non-polluting use could provide an incredible opportunity to manage and improve this section of the river environment, and manage the solar farm environment to be wildlife-friendly and improve biodiversity. JBM Solar to please consider as detailed below.

#### 2. FARMLAND ENVIRONMENT

Although farmland there will be wildlife in the fields themselves, and the features such as hedgerows, trees, headlands etc. They will all need to be fully assessed and surveys carried out at the right time of year for protected species such as reptiles, bats and dormice, badger, farmland birds etc. If there are ground nesting birds such as skylark there will be a definite negative impact, it is difficult to mitigate for skylark where the whole site is covered in arrays.

#### 3. WILDLIFE NETWORKS

It will be important to assess how the development affects the ecological network. The Hampshire Ecological Network has been mapped, and part of the development area falls within the mapped network (buffering the Whitewater) see:

<https://documents.hants.gov.uk/biodiversity/MappingtheHampshireEcologicalNetworkFinalReport.pdf>

#### 4. CONSTRUCTION

Impacts on the Whitewater during operation and construction must of course be considered. Protecting the Whitewater from pollution was discussed at the September Mattingley Parish Council meeting and assurances given regarding no risk of battery or oil leakage. It's appreciated that long term pollutants should be reduced as won't be the agricultural inputs anymore (providing no intentions to use herbicides).

However regarding construction phase, how to avoid/mitigate potential for eg mud washing into the river, what is the plan for a fuel spill etc? It is anticipated that JBM Solar will produce a Construction Environment Management Plan (CEMP)  
[https://www.designingbuildings.co.uk/wiki/Construction\\_environmental\\_management\\_plan](https://www.designingbuildings.co.uk/wiki/Construction_environmental_management_plan)

#### 5. NET GAIN FOR BIODIVERSITY

Beyond mitigation, reference the Environment Bill, it will soon be mandatory to demonstrate net gain mathematically with a Net Gain Calculator: <https://www.environmentbank.com/resource/free-biodiversity-impact-calculator-download/>

And in line with Hart [Local Plan Policy NEB4 Biodiversity](#):

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## APPENDIX I *continued*

*'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.'*

### Examples

- i Retain and enhance hedgerows;
- ii Secure some sheep grazing;
- iii Manage the land in between the panels as wildflower meadow (appreciating will need a sustained implementation plan, as establishing wildflower meadows on nutrient rich agricultural land will need some work to reduce the nutrient load before sowing);
- iv Take opportunities to enhance / create wetland areas – the site gets very wet at the margins of the river flood zone – suitable flower mixes for wet areas needed;
- v Plant species mixes across the site should be varied according to location – request a soil survey to inform wildflower sowing.

### 6. SOLAR FARM WETLAND MARGINS

As iv above. Also to note that local Mattingley landowners believe that the flood zone extends considerably further than planned for.

### 7. RIVER ENVIRONMENT

As 1. above, and again ref Local Plan Policy NEB4 Biodiversity as 5 above. Please give consideration to long term improvement of the local river ecosystem and habitats. (For eg a sustained programme to eradicate the invasive Himalayan Balsam and replant and re-establish the river banks with suitable native species.)

### 8 BEST PRACTICE

Mattingley Parish Council requests that JBM Solar strive for best practice for Solar Farms, to be achieved via a Biodiversity Management Plan, and to cover plans for wildflower meadow creation, hedgerow and hedgerow margins enhancement, wetland creation, river habitat improvements and ongoing monitoring and management:

<https://www.bre.co.uk/filelibrary/pdf/Brochures/NSC-Biodiversity-Guidance.pdf>

The Parish Council requests that JBM Solar considers working with HIWWT regarding the Biodiversity Management plan as above.

Susan Turner

Clerk to Mattingley Parish Council