

Working to Protect the New Forest



PLANNING COMMITTEE

Reply to: -

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Sent as attachment to Email only

11 November 2015

Clare Ings
New Forest National Park Authority
Lymington Town Hall
Avenue Road
Lymington SO41 9ZG

Dear Clare,

Application 15/00787 Land South Of Carlton House, Ringwood Road, Woodlands, SO40 7HT Construction of a 2.2 MW solar farm, consisting of up to 8,600 panels and ancillary facilities

1. New Forest Association (NFA) objects to this application and will support the NFNPA in any appeal against refusal. I find I am writing this objection on the same day as writing comments to HM Inspectorate regarding the appeal for a solar farm at Lepe (APP/B9506/W/15/3132171). I am also conscious that the appeal for a solar farm at Vaggs Lane is outstanding. (APP/B9506/W/15/3006387). NFA contends that any change in the Authority's policy of refusing applications for solar parks on pasture will weaken its position regarding these appeals.

2. The applicant, whose good will is not for a second doubted, speaks of the community benefit of this scheme, but is this valid? We know the community of UK will pay an estimated subsidy of £1.9 Billion pounds for renewable energy between 2013 and 2019 shared between industry and households; equivalent to an average of £425 per household - rich or poor. Expenditure on the community is the prerogative of elected representatives; it is not appropriate for the applicant, however well meaning, to usurp that role and decide himself where to spend a development gain arising from a development contrary to policy. The Authority was unhappy with the similar circumstances of 00179 (land adjacent Foxhills school).

It is worthwhile periodically reminding oneself that planning is about physical structures, not the applicant or the applicant's motive. How do we know the Exbury solar applicant is not giving all profits to charity?

3. This application is for a development of 8600 solar panels on traditional back up grazing land in the New Forest National Park.

4. National policy is well covered in the Authority's assessment (committee report) of 00470, 00817, 01004. The special emphasis of the National Planning Policy Framework on protected landscapes at section 11, para 115 is noted as is the publication of the recent National Planning Practice Guidance which introduces new conditions for schemes such as this, encouraging the use of brown field sites and introducing the need for a sequential approach to sites. An appeal inspector has subsequently ruled that the search area need not be restricted to a particular local authority area.

The applicant has previously developed a solar farm at Pennington, outside the National Park on land being restored after use for gravel extraction/refuse tipping. It is therefore reasonable that the search area is as a minimum the wider New Forest District. Brownfield sites outside of the Park e.g. Fawley power station, Dibden Bay, Land of Military Port, Totton railway sidings should first be considered. Then, given the protection afforded national parks (NPPG 115), it is reasonable that all other land not in the National Park should be considered, e.g. area west of Burton Common, area south east of Ringwood, area south east of Hythe. Then brownfield sites

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within the Park e.g. Brockenhurst railway sidings. Then land which has no special designation, is not in the 400M zone and does not and has not contributed to the landscape and ecology of the National Park.

All of the above must be discarded before the land of the application site is considered. The landscape of the site is of a typical New Forest pastoral farm and the Court of Verderers has confirmed that much of the site has the rights of common of pasture and mast. The New Forest is a unique remnant of medieval England whose ecology depends on the fragile economy of commoning; the greatest service the landowner can do with this land is to encourage the finishing of commoners' stock on all of it.

5. The comments of the Elizabeth Truss MP, Secretary of State for Environment, Food and Rural Affairs emphasise the antipathy felt by HMG and the Conservative Party in particular towards solar farms. Miss Truss is quoted as saying;

English farmland is some of the best in the world and I want to see it dedicated to growing quality food and crops. I do not want to see its productive potential wasted and its appearance blighted by solar farms. Farming is what our farms are for and it is what keeps our landscape beautiful. I am committed to food production in this country and it makes my heart sink to see row upon row of solar panels where once there was a field of wheat or grassland for livestock to graze. That is why I am scrapping farming subsidies for solar fields. Solar panels are best placed on the 250,000 hectares of south-facing commercial rooftops where they will not compromise the success of our agricultural industry.

6. If the New Forest National Park needs to justify its existence in financial terms (and there is no statutory requirement for it to do so), it is that its special qualities act as a magnet to investment into the economies of the of the South Hants built up area (the country's sixth biggest) and the Bournemouth/Poole built up area (the country's sixteenth biggest). Unquantifiable, but potentially significant loss of employment in those areas through erosion of the Forest's special qualities needs to be balanced against the claimed benefit of local development.

7. The Government's determination to build two million homes by 2020, means all land needs to work harder, either to provide more homes and industry, or to grow more, or to provide more recreation opportunities or to become of higher ecological value. The role of the New Forest National Park is clear from NPPF 115 and all recent HM Inspector appeal decisions - it must work harder for the fauna and flora, it must work harder for commoners, harder for recreation. It is the view of the NFA that using the land of the New Forest National Park for solar farms is poor use of land and a backward step.

8. In the terms of the New Forest National Park, typified by small paddocks and ever changing vistas this is not small scale and is contrary to plan. Disguising these ugly installations with their fences designed to exclude the very animals for which the New Forest was created is not enough. The report of the Authority's landscape officer for 96148 re-stated the universal truth regarding visibility in a protected landscape: - *Landscape Officer: Recommends refusal. Intrinsic landscape value of sites will be harmed even if not visible from public vantage points.* This was repeated in the landscape officer's comments on 00817 as follows: - *Intrinsic value to the landscape, whether it can be seen from a vantage point or not. Landscapes seen and unseen from public vantage points are of equal value.* It is the view of the NFA that within a protected landscape, this consideration alone warrants refusal.

9. The recent housing needs assessment for New Forest District has produced a difficult figure and for the first time in a generation new land for housing will be required within the Park. Of particular risk is the land close to the border with Totton/Southampton. Any degradation of the landscape in this area heightens the possibility of housing development. It is essential that such development is resisted at the boundary; as it would diminish the Forest both physically and spiritually.

Yours sincerely,

Graham Baker, NFA Planning Committee