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Planning Services  
Wychavon District Council  
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17<sup>th</sup> April 2023

Dear Sir/Madam

**Planning Application ref. W/23/00270/FUL for the Construction of a Solar Farm and battery energy storage system (BESS) facility together with all associated works, equipment and necessary infrastructure Land At (Os 9911 5879) Earls Common Road Stock Green (“the Planning Application”)**

Kington and Dormston Parish Council wish to object to the Planning Application for the following reasons:

**1. Principle of the development**

1.1 The application site lies in open countryside outside any settlement boundary. Policy SWDP2 seeks to direct most new development to sites within defined settlements and away from the open countryside unless in accordance with one of the other local plan policies. Policy SWDP27c (Renewable and low carbon energy) is relevant and confirms:

*“With the exception of wind turbines, proposals for stand alone renewable and other low carbon energy schemes are welcomed and will be considered favourably having regard to the provisions of other relevant policies in the plan.”*

1.2 However, the reasoned justification for Policy SWDP27 provides as follows (our emphasis):

*16. Whilst it is important that renewable and low carbon energy development is encouraged, it is also important that it is appropriately located and designed. The integration of large-scale renewable and low carbon energy proposals into south Worcestershire’s varied landscapes requires careful consideration....*

*17. Minimising any impacts caused by noise, odour, traffic and discharges to the air and watercourses will be important, particularly in relation to nearby residential areas and individual dwellings. Visual impacts on the landscape will also be a relevant issue when determining the acceptability of proposals for large-scale renewable and low carbon energy proposals.*

*18. The wider benefits of renewable and low carbon energy projects will also be material considerations when assessing planning applications. These benefits include a contribution to CO2 reduction, the diversification of local rural economies, the creation of new jobs and support for the regeneration of urban areas, including industrial and brownfield sites.*

1.3 At a national level, paragraph 148 of the NPPF gives support to the transition to a low carbon future and this is further recognised in the Planning Practice Guidance section, “Renewable

and Low Carbon Economy”. However, the PPG confirms that it is important to assess the cumulative landscape and visual impact of large scale solar farms. Rhetoric from government also provides that renewable schemes should take account of community views.

- 1.4 It is clear therefore, that whilst there is general policy support for renewable energy projects, careful site selection is key, and regard must be had to the potential impacts and the views of the local community which are detailed below.

## **2. Harm to the landscape character and visual impact**

- 2.1 The Council’s Renewable and Low Carbon Energy SPD recognises that “*the development of a solar power system has the potential to result in significant impacts upon the character and quality of the landscape.*” The SPD goes on to say, “*To avoid the systems becoming a dominant feature within the local landscape and having an adverse visual impact, they should be sited on relatively level ground to reduce their visual profile.*”
- 2.2 The Landscape and Visual Impact Assessment submitted by the applicant has not adequately addressed the landscape character and the associated visual impacts of the proposed development. Despite the Planning Application being submitted in March, no winter photography has been submitted which is a surprising and concerning omission.
- 2.3 The site is not on level ground and is undulating in places with wide ranging and far-reaching views of the neighbouring countryside which are clearly visible from the extensive network of public rights of way which traverse the site. These views will be lost if the Planning Application is approved.

## **3. Harm to heritage and cultural significance**

- 3.1 The site is surrounded by listed buildings and other heritage assets which form an integral part of the setting which pertains to open farming countryside.
- 3.2 The conservation officer’s response to the applicant’s request for a screening opinion recognises the importance of the site’s setting including its strong connection with JRR Tolkien. The officer’s strongly worded concluding remarks confirm that the proposal fails to accord with Wychavon’s conservation policies:

*“The proposals scale and necessary infrastructure will damage the significance of all the surrounding listed buildings I.E. Dormston church a Grade I listed building and Leasowes, a Grade II listed building, where the proposals will come very close to the properties. All the adjacent other listed buildings will lose their wider setting and it will damage the understanding of those buildings and their inter-relationship with the countryside.*

*It is considered that this proposal will not enhance and conserve the built heritage of the sites area and will negatively impact on the setting of the adjacent designated and non-designated heritage assets. As such it does not accord with the conservation aims of policies SWDP6, SWDP21 and SWDP24 of the South Worcestershire Development Plan 2016 (SWDP). The proposal is also considered not to meet the requirements of the National Planning Policy Framework including chapters 12 and 16.”*

## **4. Temporary nature of the Planning Application**

- 4.1 The applicant makes a large play on the development being temporary in nature as it will only be consented for a limited period of 40 years. However, 40 years covers two generations and will have a considerable and long lasting effect on the area.
- 4.2 We are also aware that it is possible for the 40 year period to be extended or for the restriction to be removed entirely if a further planning application is submitted and approved by the Council. This is a common tactic with such developments.

## **5. Use of agricultural land**

5.1 If the Planning Application is approved, it would result in the loss of agricultural land used to grow crops. Given the issues surrounding food security, to replace such land with solar panels does nothing to produce crops for human consumption.

5.2 The Government's statement, "*Powering Up Britain*", published in March 2023 confirms the Government's support for solar farms in appropriate locations:

*"...We need to maximise deployment of both ground and rooftop solar to achieve our overall target. Ground-mount solar is one of the cheapest forms of electricity generation and is readily deployable at scale. Government seeks large scale solar deployment across the UK, looking for development mainly on brownfield, industrial and low/medium grade agricultural land..."*

The applicant acknowledges that the Agricultural Land Classification for this site is 3b which is moderate quality agricultural land. Grades 4 and 5 constitute poor quality and very poor quality agricultural land respectively and therefore, this site is not considered to be an appropriate location.

5.3 The applicant also suggests that it will be possible to graze livestock alongside the proposed development, but it is difficult to see how such fields which are dominated by an extensive array of industrial machinery could ever be effectively used for livestock.

## **6. Noise and Battery Storage (BESS)**

6.1 The application site is currently a tranquil and serene part of the countryside. The noise from the construction works and ongoing noise emanating from the battery storage units will cause undeniable harm to the area's amenity. This is contrary to Policy SWDP 31 and paragraph 174 of the NPPF.

6.2 The proposed noise impacts are also difficult to assess due to the discrepancy in the number of battery storage units described in the Planning Application. The Technical Statement suggests that there will be 20, whereas the site plan appears to show 42. As this is a full planning application, clarity is essential.

## **7. Ecology and biodiversity**

7.1 The proposed development is likely to cause effects on a number of important habitats, ecological receptors and ecological networks, including Feckenham Wyldes Moor Site of Special Scientific Interest and Roundhill Wood Local Wildlife Site.

7.2 This is contrary to the conservation and enhancement aims of SWDP 22 and national planning policy.

## **8. Transport and traffic impacts**

8.1 The assessment of the transport and traffic impacts of the proposed 4.1km cable which leads from the proposed solar farm to the Feckenham Electricity Station is minimal. This work will inevitably require considerable HGV movements, traffic control measures and cause widespread disruption to residents and users of the road network.

8.2 The roads around the proposed solar farm are typically narrow, country lanes which are not equipped for use by HGVs over a number of years. Such use will be of danger to other road users, including but not limited to horse riders, cyclists and pedestrians.

## **9. Limited renewable energy benefits**

9.1 The applicant has overstated the benefits of solar power as a source of renewable energy in the UK. This is due to the limited amount of sunshine in the UK, the fact that no energy is

created overnight and that the battery technology is inefficient, preventing energy from being stored for any meaningful length of time.

- 9.2 The applicant suggests that the solar farm would benefit Wychavon residents as they would have ready access to the renewable energy created. However, this is misleading as any energy generated from the solar farm would be fed into the Feckenham Substation where it will then be directed to wherever demand is greatest. This is likely to be Redditch or to urban settlements to the north. Further, the renewable energy created would inevitably be combined with energy created from less green sources, thus limiting the supply and availability of green energy.
- 9.3 The stated low carbon benefits to be derived from the proposed development are also questionable as it appears that the materials to be used and constructions processes have not been included in the calculations.
- 9.4 The Council's Intelligently Green Plan (IGP) (2020 – 2030) lists five targets to tackle climate change. Target 4 is to treble renewable energy generation in the district by 2030, from the 2016 starting point of 108,119 MWh per annum to 324,357 MWh per annum by 2030. As it stands, the Council is already 8% over that target. Therefore, there appears limited policy support to provide additional renewable energy.

For the reasons outlined above, we consider that this sensitive landscape is an entirely inappropriate site for a large solar farm, and that the Planning Application should be refused.

Yours sincerely

Kington and Dormston Parish Council