



SOUTHWELL CIVIC SOCIETY

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Newark and Sherwood District Council,
Castle House,
Great North Road
Newark,
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15th February 2021

Consultation.

Application:	20/01242/FULM
Location:	Land North of Halloughton, Southwell
Proposal:	Construction of a solar farm and battery stations together with all associated works, equipment and necessary infrastructure.
Applicant:	JBM Solar Projects 6 Ltd.
Case Officer:	Honor Whitfield
Our Comments:	We continue to strongly object to this application.

The latest changes and additional information do not answer our previous objections submitted on 12th January 2021 and 9th August 2020 (copies attached) and we would like to add the following points in response to them:

- **Site Selection**

The Site Selection Report appears to be a belated attempt at a retrospective justification of a pre-selected site. The methodology followed falls far short of the standards for housing development detailed in the Allocations and Development DPD.

The site search area (10 km radius from the Application Site) is not a 'reasonable extent' and fails to provide a full evaluation of and comparison with alternative sites in the District. Insufficient weight is given to the environmental and planning constraints and there is too much emphasis on financial constraints. Despite this, it is significant that other landowners in this sensitive landscape area 'did not wish to engage' despite the financial gains possible.

We all want to reduce our dependence on fossil fuels to save our environment and to find alternative sources of energy. However, the very environment we want to protect must not be destroyed in the process as would be the case if this proposal was allowed to go ahead.

It is unacceptable that the report should be submitted so long after the initial token public consultation and over six months after the full planning application, with no opportunity for a proper public consultation and independent professional scrutiny.

Southwell Civic Society - Continuation

- **Inadequate Public Consultation**

There has still been no opportunity for a public meeting and site visit. The number of token amendments and the public responses to them illustrate the need for a proper public consultation. The District Council must oppose the applicant's process of attrition.

- **Landscape Impact**

The effects of any amendments on the impact of the proposals on the landscape are minimal. The latest proposal is still many hundreds of times the size over which the solar industry's own criteria for site selection state ' *Ground Mounted Solar PV projects over 50kWp, should ideally utilise previously developed land, brownfield land, contaminated land, industrial land or agricultural land preferably of classification 3b,4 and 5. 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. and not cause undue impact to nearby domestic properties or roads* '.

The District Council should make it clear to the applicant that this is the wrong place for an industrial landscape and no amount of tinkering with the details will change that.

- **Other Impacts**

Attempts have been made to demonstrate that action has been taken to minimise impacts on heritage, amenity, ecology, local community and loss of agricultural land but these have been largely token and do not satisfy the many objections received from the public or listed in our letter of 9th August 2020.

Michael Struggles
Planning Secretary.

Continued Below:-

Southwell Civic Society - Continuation

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Location: Land North of Halloughton, Southwell

Proposal: Construction of a solar farm and battery stations together with all associated works, equipment and necessary infrastructure.

Applicant: JBM Solar Projects 6 Ltd.

Case Officer: Honor Whitfield

Our Comments: We continue to **strongly object** to this application.

We refer to the amended and additional documents submitted.

We have studied the revised application and confirm that our original objections have not been satisfied. The changes made and the additional information provided do not alter the scheme in any significant way, we therefore continue to strongly object to this wholly unacceptable use of farm land and the destruction of the countryside. We refer you to our original submission of 9th August 2020, which for convenience is repeated below.

We would strongly endorse the submission of Mr John Martindale especially his expert professional assessment of the land quality. We also endorse the comments by Professor Margaret McCaskill and Professor Robert Usherwood.

Whilst few people would argue with the need for green energy, we strongly object to this particular application for the following reasons:

- **Site Selection**

The applicant has failed to adequately show that its search for this site was rational. There should be a full evaluation of and comparison with alternative sites in the District. Sites for housing development were selected following a robust methodology as detailed in the Allocations and Development DPD and we should expect no less for solar farms. This is not an outline application but a full planning application for a major development on 107 hectares of unspoilt, elevated, undulating countryside which does not meet the Solar Industry's own criteria for the selection of sites which are that *'Ground Mounted Solar PV projects over 50kWp, should ideally utilise previously developed land, brownfield land, contaminated land, industrial land or agricultural land preferably of classification 3b,4 and 5. 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. and not cause undue impact to nearby domestic properties or roads'*.

At 49.99MW, this proposal is a thousand times the 50kWp trigger referred to above.

Southwell Civic Society - Continuation

- **Inadequate Public Consultation**

The public consultation has been a token, box-ticking exercise. There was no opportunity for a public meeting due to Covid-19 despite numerous requests for a delay from many people who were consulted.

There are many factual errors in the application documents and several consultees are still waiting for responses to their questions.

Amendments to the initial proposal following consultation were minimal. Comparison with the consultation process for the DPD and Southwell Area Plan illustrates this inadequacy.

- **Landscape Impact**

It is difficult to exaggerate the dominance of the countryside around Southwell that a 100 hectare, 3 metre high 'sea of metal' would have. The applicant's LVIA may confirm that there are proposals to 'help comply with' the relevant policies but they fail and do not protect and enhance local landscape features.

The Screened Zone of Theoretical Visibility map illustrates the extent of views affected and screening by deciduous vegetation will only be effective for half the year.

It is important that those making a decision on this application have made a site visit. Natural England's response was based on an examination of the plans submitted and their response states only that they consider the proposal would '*not have a significant adverse effect on **statutorily protected sites or landscapes***'. It does not comment on the adverse effect on this non-protected landscape.

- **Flooding**

The Lead Local Flood Authority's response of 'no objection' is qualified by several conditions and states that '*A detailed surface water management plan is required to ensure that the development is in accordance with NPPF and local planning policies. It should be ensured that all major developments have sufficient surface water management, are not at increased risk of flooding and do not increase flood risk off-site.*'

Past experience with developments in Southwell has demonstrated that this detailed plan is required at the application stage, enabling public and independent expert scrutiny, otherwise there can be no confidence that the conditions can and will be met.

- **Heritage Impact**

Despite objections from several consultees the chosen access point is still alongside the Grade 2 listed church and opposite Grade2* listed Manor Farm.

The proposed development would destroy the whole character of Halloughton Conservation Area, have a severe impact on views over Southwell Conservation Area and on the unspoilt countryside around Westhorpe Conservation Area.

The archaeological survey is inadequate. The limitations of the type of geophysical survey carried out are widely recognised and there is other evidence of potential archaeology on the site.

Southwell Civic Society - Continuation

- **Amenity Impact**

The development site is crossed by a number of public footpaths and bridleways as confirmed by the Rights of Way Officer, whose 'no objection' subject to conditions is based on the requirement that they should '*remain open, unobstructed and be kept on their legal alignment at all times.*' However, if the development were to go ahead the people of Southwell and the many visitors to the area enjoying paths that link up to the Robin Hood Way would find this a greatly devalued experience. At a height of 3m (10ft), 1 m higher than a permitted domestic fence, the arrays of thousands of solar panels together with their associated security fencing and infrastructure would create an alien industrial feature in place of some of the most attractive countryside in Nottinghamshire.

- **Community Impact**

Whilst this project may provide benefits to the wider community in more sustainable energy and financial gain to the land owner and developer it is difficult to see any direct benefits to Halloughton village or its inhabitants.

Its impact would be in marked contrast to community energy projects which unite communities, providing income to locals while protecting their environment and heritage.

- **Ecological Impact**

The application fails to meet the requirements of SNP policy E3 (Green Infrastructure and Biodiversity) or policy E4 (Public Rights of Way and Wildlife Corridors) particularly in relation to the need for wild life corridors and buffer margins.

The ecological assessment report, produced from a desk based study and just one day of field survey in January, fails to identify the existing biodiversity threatened.

- **Loss of Agricultural Land**

Food production is as necessary for human survival as the reduction of global warming. Most of the proposed development site is currently either cultivated or used for grazing and should continue for the production of food rather than green energy which can be done on poorer quality land. The application erroneously classifies this agricultural land as Grade 4 when it is classified as 3 by Defra and all local farmers.

Michael Struggles
Planning Secretary