



Limpsfield Parish Council, The Pound, Wolf's Row, Limpsfield, Surrey RH8 0EB

5th October 2022

The Chairperson & Members of the Planning Committee
Tandridge District Council
8 Station Road East
Oxted, Surrey.
RH8 0BR

Dear Ms Blackwell and Members of the Planning Committee,

Re Planning Application 2022/963 - Solar Photovoltaic Farm - Land to The North West of Little Browns Railway Bridge, Hilders Lane- OBJECTION

The proposed site for a photovoltaic farm is approximately 24 hectares (ha) and sits astride the Surrey/Kent border within the Tandridge and Sevenoaks District Council areas. 12.8 ha (53%) of this site is within the Tandridge District and the parish of Limpsfield.

As a general comment, we would note that although the majority of the site sits within the Limpsfield Parish the applicant takes no account of nor makes any reference to the Limpsfield Neighbourhood Plan, in any of the documents submitted. Given that the Neighbourhood Plan was made (adopted) by Tandridge Council in June 2019 and now forms part of the Council's development control policies, we consider this to be a serious deficiency in the application.

The Limpsfield Neighbourhood Plan policies and in particular policy LNP 5 should be important considerations when reviewing this application.

Limpsfield Parish Council would also make the following specific comments relating to the afore mentioned application.

The proposal was the subject of a public consultation earlier in the year. Limpsfield Parish Council reserved its opinion on this proposal at that time but made a number of comments designed to secure more information on the proposals. The planning applications (one in Sevenoaks and one in Tandridge) contain assessments covering issues raised by the Parish Council and a number of amendments have been made designed to reduce the impact of the development, which we thank the applicant for providing.

Renewable Energy

As indicated in its earlier response to the Applicant (dated 8th February 2022), the Parish Council is fully supportive of national initiatives to reduce greenhouse gas emissions to net



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zero by 2050. Its vision for Limpsfield as set out in the Limpsfield Neighbourhood Plan is of an increasingly sustainable community and land use policies that reflect this.

Government guidance in 2015 did suggest that renewable energy projects could be managed in local policies which could identify areas suitable for renewable projects or criteria-based policy. Policies in Tandridge and in the Neighbourhood Plan do not go to that level of detail.

Landscape Character

It should be noted that this area which is currently an Area of Great Landscape Value (AGLV) is part of the current Surrey Hills Area of Outstanding Natural Beauty (AONB) area review. It is quite possible that this area will be incorporated into the AONB or will be immediately adjacent to the AONB once this review is completed.

The Parish Council highlighted the distinctive character of the Area and its sensitivity to change in its response to the Applicant.

Landscape character. The site which is at the southernmost extent of the Limpsfield Parish is an 'Area of Great Landscape Value'. Policy LNP5 (Landscape Character) of the Neighbourhood Plan specifically states

'A proposal for development will only be permitted where:

1. It would not have a detrimental impact on the sensitive landscape areas and would contribute to the Character Management Principles set out in the Limpsfield Heritage and Character Assessment.
2. Would not have an adverse impact on the landscape.

And

Within the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Area of Great Landscape Value (AGLV), development should conserve and enhance landscape and scenic beauty.

The AECOM Limpsfield Heritage and Character Assessment provides a detailed character assessment of the area., The site is within LCA 05 Low Weald Farmland which is described, amongst other things as being a 'strongly rural and tranquil area'. The character management principles focus on 'retaining the rural and tranquil characteristics of the area'. Where development does take place it 'should be integrated by woodland edges, shaws, hedgerows and well linked to the surrounding landscape fabric.



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The current proposals have been modified to limit the extent to which the development is visible from surrounding viewpoints and landscaping works are proposed which over the years would reduce the impact further.

However, there remains a fundamental issue in that the proposed development would conflict with the principles set out by policy LNP5. The development would create a very different environment which is in conflict with the 'rural and tranquil nature which the Neighbourhood Plan seeks to maintain. The solar farm despite the screening, would remain a very visible feature in the surrounding area, particularly during the winter months when few of the trees would retain their foliage.

Green Belt

The site lies within the Green Belt where development is to be strictly controlled in line with national policies.

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. They are to be protected from 'inappropriate development', which is by definition harmful to the Green Belt.

The National Planning Policy Framework (NPPF) indicates that elements of many renewable energy projects will be classified as "inappropriate development" for which those "very special circumstances" must be shown. However, those very special circumstances may include "the wider environmental benefits associated with increased production of energy from renewable sources".

Whilst the proposal at Hilders Lane incorporates a number of mitigating measures designed to decrease the impact of the solar farm, its fundamental nature with arrays of solar panels conflicts with the principle of keeping the land permanently open. At a local level, the mitigation measures would seem insufficient to constitute the very special circumstances sought by the NPPF.

Heritage

The site is close to Black Robins Farm, which includes a grade 2 listed farmhouse and a grade 2 listed barn. The open farmland forms an important part of the setting of the listed buildings. The measures designed to screen the development from the surrounding countryside limit the direct impact. However, the presence of a modern solar farm in close proximity to the listed building has a wider effect on the character of the rural landscape within



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which the Farm is set. This wider effect adds to the overall impact on the character of the area as described in the Neighbourhood Plan Character Assessment.

Flooding

Flood risk is clearly an issue and it is raised by local residents. A number of residents have supplied evidence of recent flooding in the immediate vicinity. Flood risk assessments have been provided by both the Applicant and local residents. The Parish Council is not qualified to comment on these technical assessments, but we do note the regularity of flooding in this area and ask that the District Councils give serious consideration to this issue

Loss of Agricultural Land

It is understood that the land is currently used for grazing sheep and that the way in which the panels are mounted will enable this to continue.

However, we also understand that the land has been used for a range of arable crops over the years and not just for grazing. It is our understanding that the arable land has produced good yields of wheat and barley of 4+ tonnes per acre (9.8 tonnes per hectare) in good weather years in the past. This yield is well above the national average yields of 7.9 tonnes/hectare for wheat and 6.1 tonnes/hectare for barley between 2017 and 2021 (source: Dept. for Environment Food & Rural Affairs, October 2021, National Statistics Table 3).

In recent years the land concerned has been used to grow grass for silage or hay and then used for grazing, but this is because this has produced a higher economic return than growing arable crops.

The Parish Council would question the applicant's assertion that the land "is poorer quality land" as is required by paragraph 175 of the NPPF, in order for it to be considered as suitable for alternative use and significant development.

We do not feel that the proposed application is the best use of what is productive agricultural farmland.

For the specific reasons stated above and because we consider the application to be deficient in that it takes no account of the Limpsfield Neighbourhood Plan and is contrary to policies contained in the plan, Limpsfield Parish Council objects to this application.

Yours Sincerely,

Jenny Williams

Chair of Planning Committee, Limpsfield Parish Council