



The countryside charity
Sussex

CPRE Sussex
Brownings Farm
Blackboys
East Sussex TN22 5HG
Telephone 01825 890975
info@cpresussex.org.uk
www.cpresussex.org.uk

Attention: Case Officer Ms Nicola Pettifer

Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

27 February 2022

Dear Ms Pettifer,

Representation for and on behalf of CPRE Sussex objecting to:

DC/22/0100

Land North of Huddlestone Farm Horsham Road Steyning West Sussex

Installation of a solar farm with associated infrastructure.

CPRE Sussex's concerns and reasons for objecting to this application are explained below.

1.a A previous application to construct a solar farm of 32 ha with associated infrastructure on this site was refused by Horsham District Council:

DC/13/2420, Huddlestone Farm Horsham Road Steyning West Sussex.
Solar farm comprising arrays of photovoltaic panels and ancillary plant, equipment, equipment housing and underground cable to connect park to the national grid.

1. b The subsequent appeal was recovered for determination by the Secretary of State who agreed with the examining Inspector's analysis of the application and recommendation that the appeal be dismissed:

Report to the Secretary of State for Communities and Local Government by David M H Rose BA (Hons) MRTPI. Dated 18 November 2015: Horsham District Council. Appeal by Huddlestone Farm Solar Park Ltd. And:

Secretary of State's Decision:

APP/Z3825/A/2218035, Appeal by Huddlestone Farm Solar Park Ltd:
Huddlestone Farm, Horsham Road, Steyning, West Sussex, BN44 3AD,
decision date 26 January 2016.

2. The Secretary of State's findings in respect of DC/13/2420, that the change to the character of the area's rural landscape would be severe, even with proposed mitigation, are pertinent to DC/22/0100.

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2.0.1 Not least because the solar farm now being proposed, DC/22/0100, requires land totaling 42.2 ha (Design and Access Statement, paragraph 2.2), which is 10.2 ha (31.88%) more land than the 32 ha solar farm (DC/13/2420) dismissed at Appeal, January 2016.

2.1 The Secretary of State considered that

Paragraph 8. 'There would be change to the character of the landscape which would be severe, even with proposed mitigation, within and immediately adjacent to the site. In this regard, the introduction of a visibly new 'feature' and its uncharacteristic regimentation would appear markedly out of place in the receiving landscape'.

'The impact of the proposal on the countryside would be dramatic, most notably from the public path within the site and from its continuation to the north..... Sweeping views across a parkland-like landscape and their seamless integration with the rising slopes of the South Downs National Park would be lost to an unforgiving utilitarian aspect'.

'Even with the degree of landscaping sought by the Council, the development would remain as highly intrusive and damaging to the rural scene. Moreover, the new screening between the footpath within the site and the installation would rob users of a tangible appreciation of the wider open countryside and severely impair the enjoyment of the route'.

Paragraph 15. 'Weighing in favour of the proposal, it would contribute towards national and local targets for renewable energy generation and the Secretary of State places significant weight on to these benefits. However, the Secretary of State is of the view that the period of 30 years, being the lifetime of the proposal, is a considerable period of time. Unlike the Inspector therefore, he has not afforded any positive weight to reversibility. He attaches moderate weight to the ecological benefits'.

Paragraph 16. 'Weighing against the proposal is the harmful and pervasive impact on the appearance of the local landscape. The Secretary of State attaches substantial weight to this harm. Moreover, the Framework requires great weight to be given to conserving landscape and scenic beauty in National Parks, and the proposal would have a minor impact on the outlook from the South Downs National Park'.

3. As was the case with DC/13/2420, the main features of the DC/22/0100, which if permitted would be highly intrusive and damaging to the area's rural character, are changes to land use and pattern; new built elements identified in the applicant's Design and Access Statement (DAS), paragraph 3, including:

Solar photovoltaic panels, standing up to 3m above existing ground level.

Inverter, transformer and switchgear stations distributed evenly across the solar arrays housed within green metal containers. The containers measure 12.2 m (L) x 2.4 m (W) x 2.9 m (H).

A series of buildings and electrical infrastructure, forming the substation, control room, auxiliary transformer and storage containers, within a fenced crushed aggregate compound. The substation building measures 11.7 m (L) x 4 m (W) x 3.9 m (H). The control room measures 6 m (L) x 3 m (W) x 3 m (H) and has a single 5.7 m high weather station and communications satellite dish. The storage containers measure 12.2 m (L) x 2.4 m (W) x 2.9 m (H). The auxiliary transformer 4.1 m (L) x 4.1 m (W), enclosed in 2.2 m high fencing.

Security deer-type fencing with gates at necessary locations, up to 2.1 m in height, enclosing the perimeter of the Site.

Security and monitoring CCTV/infra-red cameras mounted on up to 3 m high posts along the internal perimeter of the Site.

Combiner boxes placed at the end of solar array rows.

Weather station poles, up to 3m in height, located around the site.

Compacted internal crushed aggregate tracks to allow vehicular access between fields and to connect the associated plant and equipment on site, having a width between 3.5 m and 6 m.

3.1 Note that works required to connect the scheme to the DNO network via the overhead 33kV line that crosses the site will be subject to a separate planning application (DAS, paragraph 3.6).

4. The Horsham District Planning Framework, November 2015, (HDPF) is The Development Plan against which planning applications in Horsham District, including DC/22/0100, must be considered.

4.1 In support of the proposed scheme, the applicant's Planning Statement cites paragraphs and policies in the both the HDPF and the Regulation 19 pre-submission Horsham District Local Plan Draft (Planning Statement, paragraphs 6.65 - 6.70).

4.2 The pre-submission Plan Draft was put on hold in July 2021. Policies therein carry no weight in the decision-taking process.

4.3 Meanwhile, the HDPF is The Development Plan. Planning applications in Horsham District, including DC/22/0100, must be considered against the HDPF and policies therein.

5. 'The introduction of solar panels in Field Areas 2, 3 and 4 would introduce a land use with an engineered appearance in a part of the Site that currently has a relatively remote character'.

5.1 The applicant's Landscape and Visual Impact Assessment (LVIA: Environmental Statement Volume 1 Chapter 6) at Table 5.2 'Appraisal of Effects on Landscape Characteristics' states that:

'Although the character of the landscape in the west of the Site is more rural in character, the solar panels in Field Area 1 would appear in views which also include views towards large scale agricultural buildings at Huddleston Farm. The introduction of solar panels in Field Areas 2,3 and 4, however, would introduce a land use with an engineered appearance in a part of the Site that currently has a remote character'.

6. 'This direct landscape effect would be considered to be adverse at completion and in the medium-term and would remain adverse in the long-term'.

6.1. The applicant's LVIA states at paragraph 5.1.14. that

'The magnitude of direct effects arising from the Proposal on the landscape of the Site as a whole would be large on completion'. And 'As the sensitivity of the Site is judged to be high to medium, the significance of the direct effect at completion and in the medium-term would be major to moderate reducing to moderate in the long-term. This direct landscape effect would be considered to be adverse at completion and in the medium-term, and would remain adverse in the long-term'.

6.2 The LVIA also states at paragraph 5.1.4 that:

'Adverse effects arising from the proposed energy infrastructure would be partially counterbalanced by the beneficial effects of the landscape proposals on the existing pattern and structure of the local landscape as they become established and mature'.

6.3 However, the LVIA states at paragraph 4.4.3 that the proposed planting 'would become established and produce hedgerow landscape features of the specified height within 10 years (medium-term) and hedge tree and woodland landscape features by 15 years'.

6.4 Therefore, for a substantial part of the 40-year operational life of the proposed scheme (DAS paragraph 4.1) the adverse landscape effects arising from the proposed energy infrastructure would not be 'counterbalanced' by the proposed planting.

6.5 The refused and dismissed at Appeal scheme, DC/13/2420, would have had an operational life of 30 years.

6.5.1 The Secretary of State was of the view that 30 years was 'a considerable period of time' and he did not afford 'any positive weight to reversibility' (APP/Z3825/A/2218035, Appeal by Huddlestone Farm Solar Park Ltd: Huddlestone Farm, Horsham Road, Steyning, West Sussex, BN44 3AD, decision date 26 January 2016, paragraph 15).

7. The cumulative impact that the proposed scheme would have on the wider landscape, taking in to account the impacts of the existing solar farms and other energy infrastructure, is of considerable concern and needs to be assessed and considered in the deciding of this application.

7.1 The Government's 'Guidance Renewable and low carbon energy' states, at paragraph 007, second bullet, that:

'Cumulative impacts require particular attention, especially the increasing impact that wind turbines and large-scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases' (paragraph 007 second bullet'.

7.2 The LVIA states at paragraph 3.1.29, third bullet:

'Land use: The whole of the Site is in agricultural use, with the majority of fields under arable cultivation, with some fields used for cattle grazing. The majority of the surrounding landscape is also in agricultural use, although mixed woodland predominates as a land use in the wider landscape to the west of the Site'.

'A series of steel lattice pylons and overhead power lines span the River Adur valley floor and lower valley slopes in the wider landscape to the east of the Site'.

'Other existing energy infrastructure in the wider landscape includes two operational solar farms: Ford Farm solar farm: (planning application reference DC/13/2310) located approximately 2.7 km north-north-west of the Site, and Priors Byne solar farm (planning application reference DC/13/2381) located approximately 3.2 km north-north-west of the Site'.

8. The proposed scheme, set in an undulating landscape (ENSO Energy – UAV Surface Topography), will have a negative impact on the rural environment.

8.1 The Government's 'Guidance Renewable and low carbon energy' states at paragraph 13 that 'The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes'.

9. The proposed scheme is contrary to HDPF Policy 25 Strategic Policy: The Natural Environment and Landscape Character, because the uncharacteristic regimentation

would appear markedly out of place in the receiving landscape. The impact of the proposal on the countryside would be highly intrusive and damaging to the rural scene, to the detriment of the area's intrinsic character and beauty.

9.1 The applicant's LVIA states at paragraph 5.1.2. that 'The Site and surrounding area do not lie within a designated landscape area'.

9.2 However, although the site does not lie within a designated landscape area in the context of NPPF paragraph 174 a) in that it does not form part of a designated valued/protected landscape, paragraph 174 b) sets out the need to recognise the intrinsic character and beauty of the countryside.

9.3 How Policy 25 should be interpreted and applied where a site is not a valued landscape within the meaning of NPPF paragraph 174 a) is explained by the Planning Inspector who decided Land North of Sandy Lane, Henfield, West Sussex (APP/Z3825/W/20/3261401, decision date 19 August 2021).

9.4 The Inspector states at paragraph 46 of the Decision:

'The Council is not contending that the site is a valued landscape within the meaning of paragraph 174 a) of the Framework. However, paragraph 174 b) of the Framework recognises the intrinsic character and beauty of the countryside. Policy 25(1) of the HDPF is consistent with national policy in seeking to protect, conserve and enhance landscape and townscape character'.

10. The application is contrary to HDPF Policy 26 Strategic Policy: Countryside Protection.

10.1 Policy 26 states that outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location and must additionally meet one of four identified criteria, none of which apply to the proposed scheme.

11. The proposed scheme is contrary to HDPF Policy 36 Strategic Policy: Appropriate Energy Use.

11.1 HDPF Policy 36 Strategic Policy: Appropriate Energy Use states that the Council will permit schemes for renewable energy (e.g. solar) where they do not have a significant adverse effect on landscape and townscape character, biodiversity, heritage or cultural assets or amenity value.

11.2 The proposed scheme would have a significant adverse effect on the area's rural landscape and character.

In conclusion, CPRE Sussex asks that the application be refused for the reasons explained above.

Yours faithfully,

Dr R F Smith DPhil, BA (Hons), FRGS
Trustee CPRE Sussex

Copy to Chair CPRE Sussex