

This letter of objection was drafted in January 2022 as the Wickham Market Parish Council Planning Committee response to Planning Application DC/21/5550/FUL Erection of a solar photovoltaic (PV) array application. In the event a significantly shorter response was given using the Planning Portal. The Parish Council are aware that this planning application is still awaiting a decision. In addition, it is noted that ADAS Planning, in a letter dated 12 Sep 22 titled "Rebuttal Letter", has attempted to address our objections along with the objections of others. It is our view that the Rebuttal Letter does not fully address the detail of our objections and hence the Parish Council had decided to submit the original objection letter in full. The letter has also been updated to reflect some of the significant additional information that is now available on the Planning Portal.

The Rebuttal Letter indicates that documents that have already been submitted address the issues we have raised. One such document, the LVA, states:

"The Landscape and Visual Assessment (LVA) has also been submitted which fully assesses the impacts, both individually and cumulatively with other solar developments, of the development on the surrounding landscape character, residential receptors and viewpoints, and views from PRow running through or adjacent the site,"

However, the LVA is a subjective document which clearly states:

"It is also not within the scope of this report to determine whether the identified effects should be considered acceptable; the latter is a planning balance decision by which the determining planning authority considers all matters relating to the proposed development."

Wickham Market Parish Council object to the Planning Application DC/21/5550/FUL Erection of a solar photovoltaic (PV) array, with a total export capacity of up to 21 MW At Park Farm Loudham Hall Road Loudham Woodbridge Suffolk IP13 0NW

The reason for our objection is that the application is contrary to three policies in the ESC Local Plan.

In addition, Wickham Market PC is concerned about the poor way that this planning application was publicised by ESC and the Applicant. If planning applications are not correctly publicised the possibility of arriving at the wrong decision is increased. The reasons for our concern regarding ESC are:

- a. The application concerns a development that abuts our parish boundary and the development will be clearly visible to a number of houses and all parishioners who walk in the Deben valley, despite this we were not consulted by ESC until we brought this omission to their attention.
- b. Some key documents were not placed on the planning portal initially. Three key documents, which were appendices of the Landscape Visual Appraisal, were not added until we brought this omission to the notice of the ESC Planning department. It took a reminder from us before they

- were placed on the planning portal on 1 Feb 22. The date shown on the planning portal incorrectly states that they were posted on 26 Jan 22.
- c. The closing date for comments was not extended to allow for consideration of these documents.
 - d. We were only able to find one planning notice posted to inform the public. It is felt that these notices should have been more widely distributed.

Regarding the Applicant the Design and Access statement for the application states that the development was widely publicised, but Wickham Market Parish Council were not informed at any stage until we requested to review the application. The Statement of Community involvement is a key document as it shows that Wickham Market was deliberately left off the area where leaflets were distributed.

The proposed development is in the Deben River valley which used to be classed as a Special Landscape Area. This classification protected the Suffolk river valleys from inappropriate development. This designation has now been removed, but the Landscape Appraisal which supports the local plan makes it very clear that the Deben Valley, along with other Suffolk river valleys, should be afforded a degree of special protection.

At the end of the section on the Deben River valley in the Landscape Appraisal, it gives Strategic Objectives to be followed. Of the seven objectives four apply to the area concerned. They are:

- a. *Protect the fine grained enclosure patterns and drainage ditch networks and provide sympathetic management for ecological benefits.*
- b. *Manage land use in the floodplain in favour of traditional management practices such as grazing by cattle or sheep, and resist conversion to equestrianism, intake to domestic curtilage.*
- c. *Manage the reversion of arable land back to pasture in the lower reaches via agrienvironment schemes.*
- d. *Plan for any future expansion of Wickham Market or Ufford to be highly sympathetic to landscape character.*

These objectives have translated into policies in the Local Plan. Having considered the application we believe that the development would contravene Policies SCLP9.1 Low Carbon and Renewable Energy, SCLP10.1 Biodiversity and Geodiversity and SCLP10.4 Landscape Character.

As there are no Solar Farms planned in the Local Plan SCLP9.1 states:

The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed below:

- a. *They can evidence a sustainable and, ideally, local source of fuel;*
- b. *They can facilitate the necessary infrastructure and power connections required for functional purposes; and*
- c. *They are complementary to the existing environment without causing any significant adverse impacts, particularly relating to the residential*

amenity, landscape and visual impact, the natural beauty and special qualities of the AONB, transport, flora and fauna, noise and air quality, unless those impacts can be appropriately mitigated.

We believe that this development will cause significant adverse impact in relation to point "c." above, particularly regarding both Landscape and Visual Impact and flora and fauna. The proposed scheme occupies sloping valley sides which is visible from many vantage points both within and across the valley and only offering hedge screening is totally inadequate. Concerning the second point there is an array of panels shown that are located right next to the river and these panels are planned to be on piled foundations and installed at a raised level to mitigate flooding issues. The height of these solar panels has been increased following the extensive floods of both last and this year. It is worth noting that this field is a superb wetland habitat which would be seriously compromised if the application is approved. The panels will be visually intrusive and damage the flora and fauna adjacent to the river. Furthermore, there is a badger's sett in the middle of the proposed site. Current evidence of the badger runs show that they cross the Loudham Road in about 5 places. The badger survey suggests that fences must be raised off the ground to allow free access however, the fencing drawings show them being installed a ground level and no mention of the badger requirement is made. Thus badgers will not be able to use their normal runs.

Policy SCLP10.1: Biodiversity and Geodiversity states:

Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to linkages between habitats, such as wildlife corridors and habitat 'stepping stones'. All development should follow a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated. Proposals that will have a direct or indirect adverse impact (alone or in-combination with other plans or projects) on locally designated sites of biodiversity or geodiversity importance, including County Wildlife Sites, priority habitats and species, will not be supported unless it can be demonstrated with comprehensive evidence that the benefits of the proposal, in its particular location, outweighs the biodiversity loss. New development should provide environmental net gains in terms of both green infrastructure and biodiversity. Proposals should demonstrate how the development would contribute towards new green infrastructure opportunities or enhance the existing green infrastructure network as part of the development. New development must also secure ecological enhancements as part of its design and implementation, and should provide a biodiversity net gain that is proportionate to the scale and nature of the proposal. Where compensatory habitat is created, it should be of equal or greater size and ecological value than the area lost as a result of the development, be well located to positively contribute towards the green infrastructure network, and biodiversity and/or geodiversity and be supported with a management plan. Where there is reason to suspect the presence of protected UK or Suffolk Priority species or habitat, applications should be

supported by an ecological survey and assessment of appropriate scope undertaken by a suitably qualified person. If present, the proposal must follow the mitigation hierarchy in order to be considered favourably. Any proposal that adversely affects a European site, or causes significant harm to a Site of Special Scientific Interest, will not normally be granted permission. Any development with the potential to impact on a Special Protection Area, Special Area for Conservation or Ramsar site within or outside of the plan area will need to be supported by information to inform a Habitat Regulations Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017, as amended (or subsequent revisions). The Recreational disturbance Avoidance and Mitigation Strategy has been prepared to provide a mechanism through which impacts from increased recreation can be avoided and mitigated via financial contributions towards the provision of strategic mitigation. Where mitigation is proposed to be provided through alternative mechanisms, applicants will need to provide evidence to demonstrate that all impacts are mitigated for, including in-combination effects. Depending on the size and location of the development, additional measures such as Suitable Alternative Natural Green Spaces (SANGS) may be required as part of development proposals.

The Biodiversity Net Gain document submitted with the application covers the processes followed in detail but does not take into account the Landscape Appraisal and hence the conclusions drawn are perhaps flawed. It is our view that the proposed development most certainly does not demonstrate that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to linkages between habitats, such as wildlife corridors and habitat 'stepping stones'. The proposal accepts that development will cause harm and consequently offers a Landscape Mitigation Plan which is described in the Design and Access statement. The measures proposed are set out below:

- a. Retention of existing hedgerows and trees within proposed layout and allow to grow to a height of 3 to 4m. The tree copse to the centre of the site has been excluded from the site for the purposes of this planning application and will be retained in its current form.
- b. Native hedge planting along a proportion of the northern boundary (eastern, western, and central section).
- c. Native hedge planting along the central part of the site along the PRow.
- d. Species rich grassland and winter stubble area managed for foraging opportunities for bird species.
- e. Creation of a wet shrubland habitat adjacent to the ditch along the eastern boundary of the site.
- f. Creation of a scrub with grassland habitat in the central section of the site.
- g. Improve the block of woodland in the central part of the site to increase biodiversity value.
- h. Existing ditches retained and enhanced for biodiversity.
- i. Bird and bat boxes placed on existing mature trees within proposed site.

Whilst these measures do go in some way to mitigate the impact it is felt that they are totally inadequate for a development of some 32Ha in area. The plan to only provide a 20m buffer zone around the Badger sett does not seem adequate.

Finally, the aspects of policy Policy SCLP10.4: Landscape Character that apply to this development are:

Proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence. Development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and enhance:

- a. The special qualities and features of the area;*
- b. The visual relationship and environment around settlements and their landscape settings;*
- c. Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors;*
- d. Visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and*
- e. The growing network of green infrastructure supporting health, wellbeing and social interaction.*

Development will not be permitted where it will have a significant adverse impact on rural river valleys, historic park and gardens, coastal, estuary, heathland and other very sensitive landscapes.

Proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and Public Rights of Way network.

The development most certainly does not protect or enhance the area in any way. Around the proposed site there are numerous Public Rights of Way which enable the public to enjoy the picturesque Deben Valley. As most of this development is on raised ground it will be very clearly visible from all angles around the site.

Wickham Market Parish Council therefore object to Planning Application DC/21/5550/FUL for the reasons listed above.