



Kelly Jethwa
Planning Management
Guildford Borough Council
Millmead House
Guildford, GU2 4BB

*Please reply to: Dr John Baylis
Secretary of the Guildford Society Planning
Applications Team
58 Warren Road
Guildford
GU1 2HH*

Email: jandmbaylis@btopenworld.com

10th May 2024

Dear Kelly Jethwa

24/P/00441 | The installation of a solar facility comprising ground mounted infrastructure including inverters, transformers, a GRP switchgear enclosure, fencing, infrared cameras, motion detection system, underground cable connections, export cable, access works including new tracks, landscape planting and other ancillary development. | Land west of Blackwell Farm, Hogs Back, Guildford, GU3

The Guildford Society **objects** to the application. We recognise the need to accommodate alternative energy installations in the borough but believe determining this proposal is premature, as in particular, the boundaries of the Surrey Hills National Landscape (SHNL) have yet to be determined.

Support Renewable Energy

The Society supports the use of renewable energy sources. To tackle climate change and provide cost effective energy technologies such as PV cells and Windmills will need to be used. PV cells have reduced in price dramatically, and new developments such as Perovskite Materials promise ever increasing efficiency.

We also note that the 'CPRE Report - Shout from the rooftops: delivering a common sense solar revolution May 2023' including research conducted by the UCL Energy Institute highlighted using building to house solar panels was an increasingly effective way of providing the much need PV capacity. [Shout from the rooftops: delivering a common sense solar revolution - CPRE](#)

We need clear policies for the borough.

This is the first substantial Solar Farm proposed in the Borough as opposed to relatively minor arrays attached to domestic properties. We suspect it could be the first of many. The current Local Plan 2019 and supporting Development Management Policies are silent on the siting of alternative energy sources and particularly their interrelationship with the Greenbelt and the SHNL (AONB).

We note that Surrey's Climate Change Strategy 159, which is supported by Surrey's 12 Local Authorities, includes the strategic priority of "Expand[ing] renewable energy generation capacity across the county with a focus on solar PV installations as the greatest carbon reduction potential." It identifies Surrey as an area with great potential for solar energy in

particular. The Develop Management Policy D17 does propose some criteria for how Solar Farms might be judged in a greenbelt context, no mention is made on SHNL/AONB designated land.

We would urge the council to create firmer guidance and/or policy to guide development. The House of Commons Library has created a useful 'Research Briefing' document (February 2024) 'Planning for Solar Farms' [Planning for solar farms - House of Commons Library \(parliament.uk\)](https://www.parliament.uk/research-briefings/crossids/596187) which summarises the constraints applied to solar farms.

Alternative Sites Assessment

The society has reviewed the arguments used to arrive at the conclusion that the in the immediate area there is no alternative suitable site.

Although the university rejects Solar Panels over the large car parks on the grounds that it would reduce parking capacity, they would provide together with rooftops a reasonable area of solar capacity. As part of reducing the environmental footprint of the university surely car usage should be managed down which would support some reduction in car parking capacity..

We also noted the criteria used for judging sites is detailed as

2.7 This stage therefore used the following criteria to sieve out sites that are unsuitable because of one or more of the following absolute constraints:

- a) Size: as discussed in section 1, a minimum site area of 21.7 ha is necessary to accommodate a solar facility of the size proposed. Furthermore, sites must be of a suitable configuration that could realistically accommodate the proposed solar facility (e.g. dispersion across a large number of smaller sites would not be suitable for financial and practical reasons)*
- b) Nature conservation and landscape: the presence of 'greater than local' environmental designations or interests (such as a site of special scientific interest, a national nature reserve, ancient woodland, area of outstanding natural beauty) on the site*
- c) Existing or proposed uses and site operations: the presence of uses such as urban development of various types, extensive woodland, and recreation uses, so that it would not be feasible to secure a minimum 21.7 ha site for the solar facility*

We believe point b) underlined above would preclude the use of the proposed site if it is included in an extended SHNL.

Power Purchase Agreements

Various suppliers are now offering Green electricity via Corporate Power Purchase Agreements (CPPA) from either Solar Arrays or Wind Farms. These agreements can identify which source is being used and in some arrangements power consumers have contributed to the capital cost of the energy installation.

The financial arrangements are not available between Surrey University, including the costs to the University of lower agricultural production over a 35year life, and SSE. We are surprised that no discussion of CPPA as an alternative to the proposed solar farm is provided.

Agricultural Use combined with Solar Farms

It is true that a measure of grazing by Sheep is possible in a well-designed solar farm. In practice this activity is basically a mono-culture with limited outputs. Sheep grazing has its' own issues e.g, pollution from treatments used to protect sheep from disease, land damage if overstocked. A proper land management plan needs to be established to show how the land is to be restored from its current state as is claimed in the application.

Surrey Hills National Landscape

The society have read the arguments present by SHNL in their letter 28/4/2024 regarding the application.

We particularly note the paragraph

The application site has now been assessed by at least 3 specialist landscape consultants that it should be in the AONB: HKA commissioned by NE in 2013, those employed by Compton Parish Council at the local plan stage, together with Alison Farmer Associates commissioned by NE in this boundary review and who have extensive experience in National Park and AONB boundary determinations. Consequently, although they have no legal status the professional assessments of these 3 landscape consultants I consider currently constitute a material planning consideration. This is even before it is known whether NE still propose it to be an AONB Candidate Area in its next stage of the boundary about to be published at the end of May.

Although the extension of the SHNL is still to be determined the three landscape studies assessments in our view should also carry weight even if the land remains as Greenbelt Land as it is obviously high-quality landscape bordering an AGLV.

We have also appended at Appendix A the position statement on Solar Farms published by the SHNL on Solar Farms Nov 2023, with its concluding statements on the effects of Solar Farms visible from the SHNL.

We do note that the applicants in their Planning, Design, and Access Statement quote the Old Compton Lane, Farnham appeal case (Para 6.25 & 6.26) where the Planning Inspector attached 'limited weight' to the proposed extension of the SHNL at the time of the appeal.

As the current Surrey Hills National Landscape Extension Consultation is at the following stage:

'AONB Candidate Areas consulted upon last year and which remain in this next stage expected to be published towards the end of May, are not to be subject to further public consultation by NE. NE have since last summer been assessing the 1500 or so representations they received in order to come to their conclusions and following advice from their landscape consultants on those published AONB Candidate Areas. (SHNL Letter 28-4-2024)'

Following which proposed areas will be submitted to the secretary of state.

We appear to be within weeks of seeing final recommendations and one would hope the issuing of a variation order. The reason given in the Farnham Case referenced by the applicant as the timescale, doesn't seem to apply. Determining this application before the



recommendations are published may be legal but will not increase faith in the planning process or the public's perception of the University as a good citizen.

Conclusion

The Society commented on the previous application 22/P/02178 particularly requesting the application was tested versus the impacts on the AGLV and AONB boundaries. Significantly at a late stage in March 2023 the Surrey Hills AONB (now renamed as the Surrey Hills National Landscape (SHNL) objected in relation to the proposed AONB extension (published on the 7th March 2023) and other matters. The proposed AONB extension must be considered fully in the assessment of the new proposal 24/P/00441.

Yours Sincerely

Dr John Baylis

Secretary - Guildford Society Planning Applications Team

Appendix A

Surrey Hills National Landscape

Position Statement: Solar Panels

The Surrey Hills AONB Board recognizes and supports the renewable energy benefits of solar panels and is therefore generally supportive of solar power. At the same time, solar panel arrays can harm the landscape and scenic beauty of this nationally protected landscape. Therefore, careful assessment needs to be given to ground mounted solar panel proposals. The priority should be given to opportunities provided through installing solar panels on roofs, especially on new buildings, which provide the greatest opportunity to minimize visual impact and maximize operational efficiency through good design. Innovative methods of providing solar panels, such as above large car parks, should also be explored.

Retro-fit on existing buildings will normally be acceptable, as long as it does not adversely affect a listed building or its setting, or have an adverse impact on the character of a Conservation Area or any other location where local character is significantly influenced by the quality of the built environment. However, even in these situations, innovative solutions, for example the use of individual solar tiles, may successfully overcome these issues.

Self-standing panel installations for domestic use can, in some situations, have less visual impact upon the landscape than on roofs of visually prominent buildings but will only be acceptable if no suitable roof-mounted alternative is available, and there is no adverse visual impact affecting public viewpoints. They should avoid any adverse impacts on trees or other habitats of ecological importance. Each case needs to be considered on its merits as in some situations less visual harm can occur from roof mountings.

The great weight that national and local planning policies in the Surrey Hills AONB give to conserving and enhancing an AONB means that in these areas, large-scale commercial solar farms (i.e., field-scale arrays of self-standing panels) within the AONB should clearly be avoided. With smaller scale solar panel proposals, the preference should normally be to locate them on commercial roof space, including agricultural buildings, domestic roofs and surface car parks that could be harnessed with less or little impact on the landscape, tranquility and cultural heritage. But they should avoid having a dominant visual impact on the AONB. In some cases, a better alternative might be for small scale ground mounted solar panels. The setting and circumstances of each case will need to be considered on their merits

Outside of the Surrey Hills AONB, large-scale commercial solar farms may be acceptable provided the setting of the AONB would not be spoiled by harming public views into or from within the AONB. This approach accords with Government planning policy, Surrey Hills AONB Management Plan Policy P6 and possibly the relevant Local Plan. Much depends upon the scale of the proposal, proximity to the AONB, prominence in public views from the AONB, the intervening topography and existence of woodlands screening the development and likely to exist during the lifetime of the development.