

PRE-APPLICATION ADVICE REQUEST SUPPORTING STATEMENT

BUNKER'S HILL SOLAR FARM AND BATTERY STORAGE FACILITY, HOOK, HART, HAMPSHIRE

ON BEHALF OF JBM SOLAR PROJECTS 18 LTD

Pegasus Group

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APPENDIX 1: SITE LOCATION PLAN & ENVIRONMENTAL DESIGNATIONS PLAN

1. INTRODUCTION

- 1.1 This report has been prepared on behalf of JBM Solar Projects 18 Ltd (the Applicant), to support a request for Pre-Application Advice in respect of a proposed solar array and battery storage facility together with associated equipment and infrastructure on land at Bunker's Hill, east of Reading Road (B3349), Hook, Hart, Hampshire.
- 1.2 This report is supported as part of a request for Pre-Application Advice from Planning Officers at Hart District Council in order to gain a greater understanding of the potential for the development of a solar array at the site.
- 1.3 This pre-application request is made prior to progressing community consultation, further studies and assessments in preparation of a full set of documents necessary to support a planning application, with advice received during pre-application discussions informing these matters.
- 1.4 This report is supported by a 'Site Location Plan' and 'Environmental Designations Plan' which details the proposed development area, as well as the nearby context within which the proposed Solar Array site sites (Appendix 1).

APPENDIX 1: DRAWINGS P20-0535_01, P20-0535_02

- 1.5 This report sets out pertinent details regarding the site location (Section 2), summarises the development proposals (Section 3), outlines the broad planning policy context considerations (Section 4) and sets out some specific questions the Applicant would like to be addressed as part of the Pre-Application discussions (Section 5).

2. THE SITE

- 2.1 The site extends to 105.49 hectares and comprises agricultural land. The site is located to the north of the settlement of Hook. The site is described as land at Bunker's Hill, east of Reading Road (B3349), Hook, Hart, Hampshire, being centred on co-ordinates: X: 473217, Y: 156441, as shown in Appendix 1.
- 2.2 Reading Road (B3349) runs along the western boundary in places. It is likely that the proposed site will be accessed from an existing access point on the B3349 into the western boundary of the site.
- 2.3 Bunker's Hill Farmhouse is located centrally within the site but is excluded from the application site. Associated farm buildings and access tracks are located in close proximity to Bunker's Hill Farmhouse and are included within the site boundary. Additionally, a number of relatively isolated properties and farms are located in close proximity to the site.
- 2.4 The River Whitewater generally follows the eastern boundary in a broadly north-east to south-east route.
- 2.5 Areas of Ancient Woodland are located in relatively close proximity to the eastern site boundary.
- 2.6 Overhead power lines run across the site in two locations.
- 2.7 Some existing vegetation and hedgerows are present along field boundaries around and within the site.
- 2.8 Rotherwick Footpath 17 crosses the northern portion of the site in a broadly east to west direction. Additionally, Rotherwick Footpath 23 crosses the southern part of the site in a broadly east to west direction. The Public Rights of Way located within and in close proximity to the site are shown on the Environmental Designations Map (See Appendix 1).
- 2.9 The majority of the site is located within Flood Zone 1, however, there are some areas towards the eastern and southern boundaries which are located within Flood Zone 2 and Flood Zone 3 as illustrated in the Environmental Designations Plan (Appendix 1). The areas at risk of flooding are those areas closest to River Whitewater.

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- 2.10 Within the site boundary the barn at Bunker's Hill Farm to the east of the Farmhouse as well as Bunker's Hill Farmhouse are both Grade II Listed Buildings. A number of additional Grade II and Grade II* Listed Buildings are located within close proximity to the site. Tylney Hall (Grade II*) Registered Park and Garden is located c.250m west of the proposed site. A number of conservation areas are located in close proximity to the proposed site as illustrated on the Environmental Designations Plan (Appendix 1).
- 2.11 Natural England Regional (1:250 000 scale) Agricultural Land Classification Maps detail that the site forms Grade 3 'Good to Moderate' and Grade 4 'Poor' land. A site-specific agricultural land classification survey will accompany the planning application.
- 2.12 The attached Environmental Designations Plan (P20-0535_01) demonstrates the proximity of the site to environmental designations.

3. DEVELOPMENT PROPOSALS AND APPLICATION APPROACH

3.1 The development proposals comprise the installation of a ground mounted solar array and battery storage facility together with associated equipment and infrastructure on the site described in Section 2 of this report.

3.2 The likely Description of Development for the planning application will be:

“Construction of a solar array and battery storage facility together with all associated works, equipment and necessary infrastructure.”

3.3 It is anticipated that the delivered capacity of the proposed development would be up to 49.9MW, offering significant CO₂ savings during the operational life of the development.

3.4 The proposals are shown indicatively on the submitted information and will likely include the following:

- Photovoltaic (PV) arrays based on a simple metal framework ('table') which is pile driven into the ground, avoiding the need for substantive foundations (unless otherwise required due to findings from geotechnical investigations);
- Battery Storage Facility;
- A number of inverters at various locations around the arrays, and away from the site boundaries as well as areas at risk of flooding;
- Customer Station (Delivery Station);
- Boundary fencing (e.g. deer fencing) around the edge of each development parcel;
- A CCTV system, either pole or fence-mounted, located at strategic points around the site;
- Associated access tracks connecting inverter/transformer units;
- Storage container(s) for spare parts etc.;
- Relevant communications and monitoring equipment;

- A Construction Compound; and
- Creation or improvement of site accesses for construction, operation and decommissioning purposes.

3.5 Detailed development proposals will allow for, significant buffers to the existing and established site boundary vegetation, as well as accommodating site-specific constraints.

Flood Risk

3.6 The majority of the site is located within Flood Zone 1, however, there are some areas of Flood Zone 2 and Flood Zone 3 within the site boundary.

3.7 Table 2 of the Flood Risk and Coastal Change Planning Practice Guidance (PPG) does not clearly specify the flood risk vulnerability classification of solar farms. However, a review of the different vulnerability classifications indicates that the closest classification to solar farms would be 'wind turbines' as wind farms are also a renewable energy source used to generate electricity. This has been confirmed for a separate solar farm planning application where the EA advised the Local Planning Authority (LPA) that a proposed solar farm should be classified as 'essential infrastructure'.

3.8 There are several FRAs that have been submitted for planning applications that classify solar farms as essential infrastructure, including planning applications in both Stroud Local Planning Authority (LPA) (Planning Ref. 14/1800/FUL) and Bristol LPA (Planning Ref. 15/00502/F). Consequently, this approach is consistent with other solar farm applications.

3.9 A search for approved solar planning applications within Hart District Council, demonstrates that planning application 14/00998/MAJOR ('Solar Farm and Associated Equipment') has been approved in an area at risk of flooding in Flood Zone 3.

3.10 On this basis, the proposed development is therefore considered to be an appropriate use in Flood Zone 2 and Flood Zone 3.

3.11 To ensure the development would remain operational and safe during times of flooding, the design of the site has carefully considered flood risk.

Grid Connection

- 3.12 The Solar Array will connect directly to the overhead powerline which crosses the site.

The Approach

- 3.13 Subject to the Pre-Application Advice received and the outcome of community consultation, the Applicant will prepare a full planning application for consideration by Hart District Council.

- 3.14 Such a full application is proposed to be supported by the following:

- Statutory application requirements including: a completed application form, Site Location Plan, Planning Statement, Design and Access Statement and the relevant application fee;
- Detailed drawings of associated buildings, equipment and plant proposed as well as the proposed site layout, including indicative planting plans;
- Statement of Community Involvement;
- Environmental assessments and reports addressing the following topics (to be in the form of an Environmental Statement if proposed development deemed EIA through Screening process):
 - a) Landscape and Visual (including trees & hedges)
 - b) Biodiversity
 - c) Transport and Traffic
 - d) Flood Risk and Drainage
 - e) Cultural Heritage
 - f) Agricultural Land

- 3.15 The Applicant will submit a Request for a Screening Opinion to Hart District Council for consideration as to whether the scheme constitutes EIA development, having regard to the relevant thresholds set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and site circumstances.

- 3.16 This request will be made separately to this request for pre-application advice, but it is hoped the implications of the EIA Regulations can be included in pre-application discussions.

4. PLANNING POLICY REVIEW

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 This section identifies the key planning policy and guidance relevant to the proposed development. The Planning Statement prepared to support the subsequent planning application will include a full assessment of the relevant policies and guidance. An overview of the provisions that are intended to be assessed are provided here.
- 4.3 The Development Plan relevant to the site comprise the following documents:
- Hart Local Plan 1996-2006 (Saved Policies);
 - Emerging Hart Local Plan Strategy and Sites 2016-2032 (Proposed Submission Version); and
 - Hook Neighbourhood Plan 2018-2032 (Adopted August 2019).
- 4.4 Other material considerations in terms of policy and guidance include the following:
- National Planning Policy Framework (February 2019); and
 - Planning Practice Guidance (first published March 2014).
- 4.5 The majority of the site is located within the Rotherwick Civil Parish and a smaller portion of the site is located within Hook Civil Parish.
- 4.6 Hook was designated as a Neighbourhood Area on August 2019. The south eastern section of the proposed site is partially located within the designated Hook Neighbourhood Plan Area.

Development Plan

Hart Local Plan 1996-2006 (Saved Policies)

- 4.7 The adopted Local Plan for Hart includes the saved policies of the Hart Local Plan 1996-2006. The Hart District Local Plan (Replacement) 1996-2006 was adopted on 23rd December 2002. On 22nd June 2006 the Council adopted the First Alterations to the Hart District Local Plan (Replacement).

4.8 Policy GEN10 relates to 'Renewable Energy' and is therefore of most relevance to this application. Policy GEN10 states:-

"Proposals for the development of renewable energy schemes will be permitted provided that:

(i) the impact of the development on the immediate and wider landscape is not significantly detrimental;

(ii) the proposal does not adversely affect features and areas of ecological, historic or cultural interest;

(iii) the impact of development on local land use and residential amenity is minimised, both during and after construction, to the satisfaction of the local planning authority;

(iv) the proposal is justified in terms of local and wider benefits;

(v) the location is necessary as the particular resource can only be harnessed where it occurs."

4.9 The Local Plan text confirms that **"the Council will need to consider both the immediate impact of renewable energy projects on the local environment and their wider contribution to reducing emissions of greenhouse gases."**

4.10 It is considered that the following saved policies of the Hart Local Plan would be relevant to the proposed development:

- Policy GEN1 – General Policy for Development
- Policy GEN3 – General Policy for Landscape Character Areas
- Policy GEN11 – Areas Affected by Flooding or Poor Drainage
- Policy CON5 – Species Protected by Law
- Policy CON6 – Heathland
- Policy CON7 – Riverine Environments
- Policy CON8 – Trees, Woodlands and Hedgerows

- Policy RUR2 – Development in the Open Countryside – General
- Policy RUR3 – Development in the Open Countryside - Control

Emerging Hart Local Plan Strategy and Sites 2016-2032 (Proposed Submission Version February 2018)

- 4.11 The Hart Local Plan Strategy and Sites 2016-2032 was submitted for examination on Monday 18th June 2018 and it is anticipated that the emerging Local Plan will be adopted on 26th March 2020.
- 4.12 On adoption of the emerging Local Plan, a number of the saved policies within the existing Hart Local Plan will be replaced. The following relevant saved Local Plan policies will not be superseded by the emerging Local Plan: GEN 1, CON 7 and CON 8.
- 4.13 The emerging Hart Local Plan sets out the overall development strategy, key policies and sites or broad locations for delivering housing, economic growth, infrastructure and environmental protection. The emerging plan relates to the whole District.
- 4.14 The emerging Local Plan recognises that **"the delivery of renewable and low carbon energy schemes will contribute towards the mitigation of the impacts of climate change."**
- 4.15 Policy NBE11 refers to 'Renewable and Low Carbon Energy' and sets out the main issues that are likely to be relevant when reviewing the merits of a renewable or low carbon energy generation scheme against any potential adverse impacts. Policy NBE11 confirms:-

"Proposals for the generation of energy from renewable sources, or low carbon energy development (with the exception of wind turbines) will be supported providing that any adverse impacts are addressed satisfactorily including individual and cumulative landscape and visual impacts. All such applications are subject to the following considerations:

a. proximity to, and impact on, transport infrastructure and the local highway network;

b. the impact on designated sites of European, national, regional and local biodiversity and geological importance;

c. the impact on heritage assets;

d. the impact on high grade agricultural land;

e. the impact on residential amenity including emissions, noise, odour and visual amenity; and

f. the degree to which the developer has demonstrated any wider environmental, economic and social benefits of a scheme as well as to how any adverse impacts have been minimised."

4.16 In addition, the following emerging Local Plan policies are also considered to be relevant to the proposed development:

- Policy SD1 – Sustainable Development
- Policy NBE1 – Development in the Countryside
- Policy NBE3 – Landscape
- Policy NBE5 – Biodiversity
- Policy NBE6 – Managing Flood Risk
- Policy NBE9 – Historic Environment
- Policy NBE10 – Design
- Policy I1 – Infrastructure
- Policy I2 – Green Infrastructure
- Policy I3 – Transport

Hook Neighbourhood Plan 2018-2032 (Referendum Version)

4.17 The proposed site is partially located within the Hook Neighbourhood Plan Area.

4.18 One of the objectives within the Neighbourhood Plan states:- **"Encourage new development to incorporate sustainable design features and building**

materials such as energy and water efficiency measures, renewable energy schemes."

4.19 The following general policies contained within the Hook Neighbourhood Plan may be relevant to the proposed development:

- Policy HK4 – Protection and Enhancing the Biodiversity of Hook
- Policy HK5 – Landscape
- Policy HK7 – Views
- Policy HK12 – Design
- Policy HK13 – Locally Significant Heritage Assets

4.1 Specific and full consideration will be given to the relevant criterion of these policies in the Planning Statement which accompanies the planning application.

National Planning Policy and Guidance

4.2 The Planning Statement will also consider the proposals against national planning policy and guidance, as material considerations, to the consideration of the planning application.

4.3 The National Planning Policy Framework (NPPF) published in February 2019 sets out the Government's approach to planning and achieving sustainable development. Of particular relevance to the proposed Solar Array is Chapter 14: Meeting the challenge of climate change, flooding and coastal change.

4.4 Importantly, Paragraph 154 details that:

"When determining planning applications for renewable and low carbon development, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and

b) approve the application if its impacts are (or can be made) acceptable ..."

4.5 The web-based National Planning Practice Guidance section 'Renewable and Low Carbon Energy' contains guidance relevant to the consideration of the application.

Paragraph: 013, Reference ID: 5-013-20150327 is entitled 'What are the particular planning considerations that relate to large scale ground-mounted solar photovoltaic Arrays?' and lists the specific considerations for this type of development.

- 4.6 Specific assessment will be undertaken against the above requirements in the supporting Planning Statement, plus other policies and guidance as relevant to particular considerations.

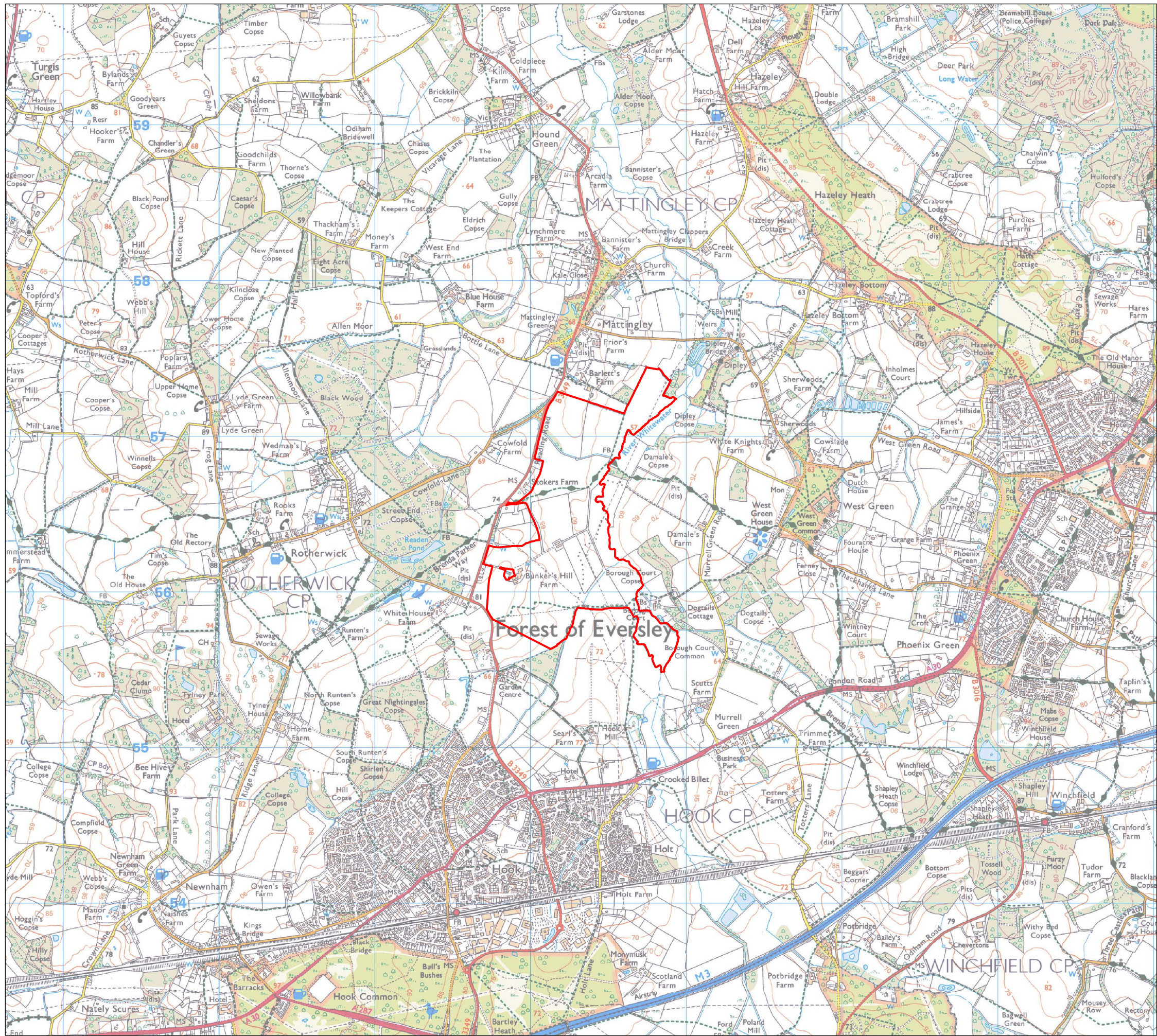
5. CONCLUSIONS AND QUESTIONS FOR PRE-APPLICATION ADVICE MEETING

5.1 We would appreciate Officer's feedback to inform the development proposals and preparation of the planning application. The following listed questions are included as a potential guide to discussions and the advice received:

1. Do Officers consider this site suitable 'in principle' for the proposed development?
2. Are there any comments from specialist consultees (Landscape, Highways, Heritage, Drainage, Flood Risk, Ecology etc.) which may inform the further refinement of the development proposals and assessment?
3. Are there any further planning policies, documents or guidance to those listed at Section 4 of this report which should be considered in the planning application?
4. What are the validation requirements for a planning application for the proposed development?
5. Which matters should be assessed in the planning application (either as standalone assessment or included in the Environmental Statement if the scheme is deemed EIA development)?
6. Officers guidance on the best location to hold a community consultation event and the means of advertising this event would be welcomed.

APPENDIX 1:

SITE LOCATION PLAN ENVIRONMENTAL DESIGNATIONS PLAN



KEY

Site Boundary

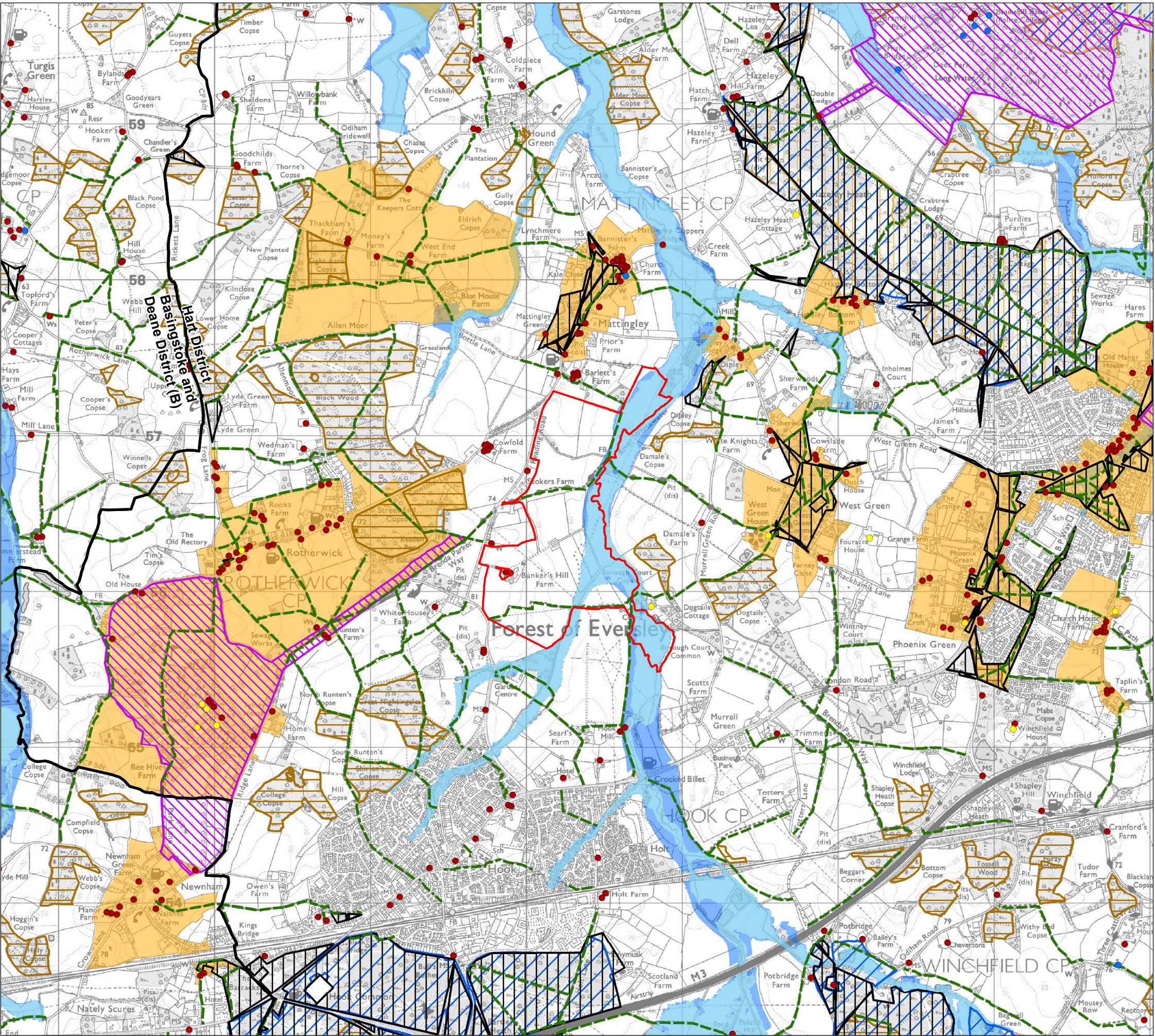
Revisions:
First Issue- 11/03/2020 JS

Site Location Plan

Bunker Hill Solar Farm

Client:	JBM Solar Projects Ltd		
DRWG No:	P20-0535_02	Sheet No:	- REV: -
Drawn by:	JS	Approved by:	SC
Date:	11/03/2020		
Scale:	1:25,000	@ A3	Pegasus Environment





KEY

Site Boundary

Local Authority Boundary

Public Right of Way

Open Access Land /
Registered Common Land

Grade I Listed Building

Grade II* Listed Building

Grade II Listed Building

Registered Park / Garden

Conservation Area

Special Protection Area (SPA)

Site of Special Scientific Interest
(SSSI)

Ancient Woodland

EA Flood Zone 3

EA Flood Zone 2

Revisions:
First Issue- 03/03/2020 JS

Environmental Designations Plan

Bunker Hill Solar Farm

Client:

JBM Solar Projects Ltd

DRWG No:

P20-0535_01

Sheet No:

-

REV:

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Drawn by:

JS

Approved by:

SC

Date:

03/03/2020

Scale:

1:25,000 @ A3

Pegasus

Environment

