

24 September 2014

Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

For the attention of the Chief Planning Officer

Dear Sir

Planning Application Reference RR/2014/1664 – Catsfield Road, Catsfield

Rother CPRE wish to object to this application. We shall follow the same format as we did in the recent St Francis Farm application.

CPRE has created an exceptionally useful set of criteria and a check list in order to assess rationally whether any particular application for a solar farm is acceptable or not in terms of the relevant landscape and environment.

We shall deal with the criteria and the checklist in order:

Criteria (these are assessed with a conclusion that either a solar farm may be accommodated in the landscape, ie positive, or there is reduced chance that it can be so, ie negative.)

- 1 Landform and visual factors: CPRE Conclusion: negative: as the landscape and visual impact assessment states, this site is outside the High Weald AONB, but only just so, and is in close proximity to Ancient Woodlands. This location however does not mean there is licence for any and all applications which would not be permitted inside the High Weald AONB boundary. The fact that there are 'urbanising' features in the nearby landscape (Ninfield Transforming Station and presumably the two currently approved solar farms in the area, one in Rother, the other in Wealden) does not create the freedom to create more of such features. The fact that the site is surrounded by woodland, some of which is Ancient Woodland raises the intrinsic value of the land contained within the application, and cannot be regarded as a reason, ie with the use of screening, for positively promoting development such as a solar farm which is clearly of an industrial, rather than a rural nature.

The statement in paragraph 3.12 'It is considered that the landscape in which the site is set is of medium sensitivity and has some potential to accommodate change' is hardly a ringing call for change of such a substantial nature as the industrialisation of the 24ha site.

Paragraph 4.2 refers to the panels being dark grey/blue in appearance, which is certainly not the colour of farm land at any time of the year. Buffer planting of new hedgerow planting will take years to build up to sufficient screening to the industrialised landscape. In paragraph 4.5 reference is made to the 'contained' nature of the actual site as though it is a benefit, whereas of course it simply emphasises the contrast the boundaries of woodland, including Ancient Woodland, and the industrialised site itself.

In paragraph 5.2 it states the proposals will not represent a 'significant large scale' development. What would constitute significant and large scale if not a site covering 24ha? Our view is that the area covered is both significant and large scale.

In paragraph 5.4 the applicants state that the significance of the proposed change will be moderate/minor and the change is not significant and therefore is acceptable. This we consider is a purely subjective view proposed by the applicants and in view of the sheer size of the application area, this application cannot be said to be 'not significant' or 'minor' or therefore 'acceptable'. The only people who would say it is acceptable in landscape terms are the developers themselves.

- 2 Landscape pattern and complexity: CPRE Conclusion: negative: for the reasons explained in the previous paragraph 1, this site is set within a complex landscape, very redolent of the High Weald landscape, and another intrusion of an industrial nature will completely transform the landscape pattern to the detriment of the surrounding environment.
- 3 Settlement and man-made influences: CPRE Conclusion: negative: CPRE submitted comments on the St Francis Farm application and these comments apply even more strongly and relevantly to this application, even though permission was granted by RDC recently to the St Francis Farm site. This application is to the west of both this and the Ninfield Grid Sub-Station and is even more embedded in a complex landscape than St Francis Farm. There is sufficient intervening woodland to ensure that the other sites would be sheltered from this current application site.
- 4 Inter-visibility with adjacent landscapes: CPRE Conclusion: neutral tending to negative: it is accepted that because of the complexity of the surrounding landscape the site would not be visible from too many locations. There is however a footpath running alongside the southwestern boundary of the western half of the site, and therefore the impact of the industrialised landscape proposed would be even greater given the overall attractiveness of the surrounding landscape for walkers and other visitors to the area.
- 5 Peripheral aspects (sense of remoteness, tranquillity): CPRE Conclusion: negative: the site is indeed remote in the context of its immediate vicinity, with only one public footpath giving views on to the site. The surrounding network of varied woods creates a very tranquil backdrop and emphasises the contradiction being proposed in transforming reasonable quality farmland into an industrial site, quite out of keeping with its surroundings.

Summary Checklist

- a) Does the proposal avoid harm to landscape character and quality when viewed from publicly accessible vantage points? No.
- b) Does it avoid cumulative impacts on the landscape character and quality when viewed from publicly accessible vantage points? No.
- c) Does it avoid harm to valued and special landscapes? No.
- d) Does it avoid harm to views from public rights of way and the surroundings of settlements? No.
- e) Does it use brownfield land other than where this would be better used for housing, or if not, avoid using the best and most versatile land (Grades 1, 2 and 3a) and respects local production systems? No, since the land is Grade 3.
- f) Does it have a beneficial overall impact on bio-diversity? No; there is nothing in the application which would suggest there is any possible benefit to bio-diversity.

General comments

- 1 Others have comments about the inadequacy of the access to the site. We agree with those views put forward regarding the potential serious traffic hazards created by considerable numbers of HGVs entering and leaving the site during the construction and decommissioning phases.

- 2 As with other solar farm applications, cognisance needs to be made of the considerable number of ancillary works connected with such an application, such as transformers, control centres substation, CCTV masts, fencing. These structures reinforce the industrialisation of the landscape caused by this proposal.
- 3 Very little effort appears to have been made in terms of community involvement, and the applicants' reference to the outcome of discussions with the Parish Council and the District Councillors are totally at odds with the views of both, strongly expressed on your website. There is indeed a very strong expression of view by the District Council against the application, which in itself is very unusual.
- 4 It is interesting to note that whereas the applicants provide photographs of the site in its surrounding context, they singularly fail to exhibit any photomontages with the structures envisaged by this application being shown. Was this too scary for the developers to contemplate including in this application?
- 5 With regard to the ecological report we would observe as follows:
 - a) In paragraph 4.2.8 it refers to significant woodpiles being on the site, without investigating and commenting on what might prove to be an extremely interesting ecological sub-site.
 - b) Whilst the report refers to off-site badgers and greater crested newts it does not refer otherwise to the propensity for fauna to travel across this site and colonise parts of it.
 - c) In paragraph 6.5 it refers to protective measures for the watercourse consisting of inter alia a Heras fence. A Heras fence is a portable large mesh fence incapable of preventing small objects and in particular liquids escaping into the water course.
 - d) Paragraph 6.16 indicates an offer of a 'small' number of bat boxes to be erected, which does not seem very much by way of ecological improvement across a 24ha site.
 - e) In conclusion, as we may have anticipated, the ecological appraisal does its best to downplay the ecology of the site, and by implication that of its surroundings. Whilst parts of the site have suffered the ravages of intensive agriculture and silviculture, not all of the site has so suffered, and the application singularly fails to offer much by way of ecological balance or improvement to masses of metal, glass and concrete invaded into a peaceful rural environment.

For all the reasons set out above, we urge that this application should be rejected.

Yours faithfully



Stephen Hardy