



The countryside charity
Gloucestershire

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Adam White
Planning and Development Services,
Tewkesbury Borough Council,
Council Offices, Gloucester Road,
Tewkesbury, Glos GL20 5TT

Dear Adam

21/00259/FUL Construction of a solar farm and battery storage facility together with all associated works, equipment and necessary infrastructure. Land at Claydon Farm, Claydon, Tewkesbury Gloucestershire GL20 7BH

CPRE supports renewable energy schemes in principle. However, we object to this particular development for the reasons outlined below.

The Development Plan

The development plan for these purposes consists of the Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury. The Examination of the Tewkesbury Borough Plan (TBP) has now concluded. The Inspector has not yet reported and the Plan is therefore still some way short of adoption. We understand that policies that have not attracted objections can be given significant weight prior to adoption. One such policy is ENV3 Solar Farms. Nevertheless, the lack of objection in principle to a policy *per se* does not diminish the force of an objection in terms of that policy to a particular proposal when it arises.

Planning History

We note that the Council permitted subject to conditions an application (14/00785) for a solar farm at Claydon Farm. This has now expired; indeed, its site now forms part of the current application. The present application is on a much greater scale (site area given as 107 hectares, compared with 25 hectares for 14/00785) and its landscape impacts are likely to be disproportionately greater.

Joint Core Strategy

JCS Policy SD7 states:

“All development proposals within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan”.

The site lies less than 2km from the lower slopes of Oxenton Hill and the AONB boundary and therefore is within the setting of the AONB. In our view the proposed development does not conserve, let alone enhance, the landscape and its scenic beauty. A very important attribute of the Cotswold scarp generally and in this area in particular is the views it offers to the west. The proposed development would have a detrimental effect on those views. The applicant's Planning Statement does not refer to the Cotswold AONB Management Plan in its summary of the Landscape and Visual Assessment; nor does the LVIA itself.

Policy INF5 Renewable Energy/Low Carbon Energy Development is drafted in permissive terms but subject to significant qualifications, notably (i) cumulative impact and (ii) effect on protected areas. These matters are covered, and reinforced, by Tewkesbury Borough Plan Policy ENV3.



The Planning Statement makes two references to Policy INF5, quoting it in full at the first. However, it does not appear to have addressed directly the issues raised in part 2 of the policy. The Council should be satisfied that these issues have been adequately addressed before going on to consider the planning balance.

Tewkesbury Borough Plan

Policy ENV3 deals specifically with solar farms. Its opening sentences refer to the priority given for such development to previously developed or non-agricultural land. The site is neither previously developed nor non-agricultural land.

We consider the drafting of the policy, treating landscape impact and cumulative impact as separate issues, is significant. A proposal could be unacceptable on its own, irrespective of any in-combination effects. A proposal could be considered acceptable on its own but unacceptable taking other schemes into account. In this particular case, we think the proposal fails on both counts.

Part 1 of ENV3 refers to landscape impact. Although the landscape in the immediate vicinity is flat, the eastern edge of the site lies, as already indicated, close to Oxenton Hill. Development of a solar farm on a site of well over a square kilometre will cause significant harm to views from public rights of way on the western slopes of Oxenton Hill, including the Gloucestershire Way.

Part 3 of ENV3 refers to cumulative impact. The application is in conflict with this part of Policy ENV3. Less than 1 kilometre separates the south western corner of the application site from the Troughton Solar Farm (12/01220/FUL) covering 41 hectares and now in operation, and to the north east the application site adjoins the Starveall Poultry Farm (18/01251/FUL), for which permission was granted in March 2020. In addition, there are other significant developments in this area, including the 850 dwellings at Fiddington. The cumulative impact of development in this hitherto almost entirely rural area of the Borough is significant, and on this basis the application should be refused.

Need, alternatives and cumulative impact are all matters which are required to be addressed in Environmental Impact Assessment. This is not EIA development; we note the reference to a screening opinion at paragraphs 1.18 and 1.19 of the Planning Statement and the Council's response. Nevertheless, as already noted, Policy ENV3 covers the third of these. The reasoned justification for Policy ENV3 is important as well as the policy itself; the opening sentence of paragraph 8.77 states *"The Council will require applicants for proposals involving agricultural land to demonstrate that there are no reasonable alternative sites on previously developed land in the Borough"*.

Need is implicitly addressed in paragraph 8.76 of the TBP, but only in the most general terms and not in relation to any targets for renewable energy production, either national or local. We are mindful of paragraph 154 of the NPPF but nevertheless consider that need should have been addressed in this particular case given its scale and location.

Altogether, we consider that the applicant's Planning Statement fails to demonstrate that the proposed development fully complies with relevant policy.

Public Rights of Way

A bridleway and a footpath pass through or close to the southern part of the site, and another adjoins the northern edge. Their existence is acknowledged at paragraph 2.5 of the Planning Statement but there is no mention of them under the relevant subheading in Section 6, before paragraph 6.41.

Site access during construction

As noted by the local parish councils, the proposed access route during construction is along the narrow roads of Gotherington Fields and Bozard's Lane. Despite the proposed one way system, the impact on the lanes and dwellings is unacceptable and alternative access should be sought. We note that GCC Highways has requested that determination of the application be deferred until these impacts can be properly assessed.



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A46 Upgrade

The M5 Junction 9 & A46 Progress Report to the GCC Cabinet meeting on 24 March 2021 anticipates a non-statutory consultation during the summer of 2021. The preferred route will be announced in summer 2022 and will be followed by a statutory consultation.

Independently of the merits or otherwise of the application, we request that a decision on it be deferred until the preferred route is announced.

Planning Balance

We acknowledge that this scheme has benefits in tackling the effects of climate change, and in respect of some issues adverse impacts would be small. However, we consider that application fails to comply with JCS policies SD7 and INF5 and with Tewkesbury Borough Plan Policy ENV3. The adverse impacts on the landscape and in terms of cumulative effects are significant and in this case sufficient to outweigh the benefits.

We therefore respectfully request the Council to refuse the application.

Yours sincerely

Major Tom Hancock DL

Chairman, CPRE Cheltenham, Gloucester and Tewkesbury District

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