

Bentley Parish Council – Objection to Grove Farm Solar Farm DC/23/05656

Bentley Parish Council Object to this application by reason of:

- It is contrary to policies in the adopted Bentley Neighbourhood Plan (see below)
- It would cause significant harm to the historic core of the village and its listed and unlisted heritage assets.
- It would cause significant damage to a recognised valued landscape area.
- It would have significant impact on residents' amenities by reason of noise, glint and glare and visual impact.
- It would result in the loss of a large area of good quality, productive arable land.
- It offers no community benefit (contrary to NPPF and SCC planning policy)

While Bentley Parish Council supports the need for renewable energy sources, including solar, it strongly objects to this huge, 116 acre solar farm being placed in the historic core of our village.

It will cause significant harm to our susceptible and unique, heritage landscape and to the many residents who live adjacent to the site.

Heritage - This historic landscape, preserved for centuries, with its intact manorial complex of Falstaff Manor, St Mary's Church, Bentley Hall, ancient Engry Wood and other associated grade listed buildings, encircles the proposed site. This special landscape is rare in the context of the wider Shotley Peninsula and is recognised in the Suffolk Coasts and Heaths Additional Project Areas as a Valued Landscape. This is significant both in terms of the NPPF and the AONB Management Plan. A review of the LVIA by Alison Farmer Associates finds that judgements on the proposed development have been underestimated and that this development would *"seriously erode the special qualities of the whole site"*.

Landscape - Villagers place a high value on the wide-ranging views across this heritage landscape set in its open skies. Enjoyment of this beautiful, peaceful, deeply rural landscape by residents and visitors would be transformed by an industrialised landscape, where the visual effects couldn't be fully mitigated by hedge planting and noise levels would be intrusive.

Our designated Quiet Lane, Church Road is used daily for exercise, enjoyment of nature and for access to our Grade 2* listed St Mary's Church. The road bisects the application site and so people using the lane would be in the middle of a solar farm seeing CCTV, security fencing etc instead.

Loss of Amenity - Bentley Parish Council have real concerns about the impacts to residential amenity. In terms of Glint and Glare, we feel expert assessment is required to assess these effects. The submitted noise assessment appears to have underestimated sound levels both at residential properties and in Potash Lane and Church Road (see Mr Doug Sharps' Noise Assessment Report). Intrusive noise, both during construction and during operation, as well as an oppressive outlook will have a significant adverse impact for those living adjacent to the site or using the rural lanes.

Loss of BMV Land - Sacrificing BMV land that produces good crops every year, as this site does, when there are alternatives is completely counterproductive. Solar panels should be placed on brownfield sites, industrial buildings or poor quality land where food production does not have to be sacrificed. New BMV farmland cannot be created.

Construction – Church Road, Potash Lane and connecting footpaths and a bridleway surrounds three sides of the site and are well used by walkers, cyclists and equestrians but the needs of those users during construction have not been considered neither is the viability of access to the proposed DNO sub-station using the single track, Quiet Lane of Church Road.

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Community Benefits - There are no Community Benefits for the village of Bentley mentioned, which if the application was approved, would need to be included.

We fully support the representations made by Tom Hill KC in the Group Objection to Grove Solar Farm Bentley document and those made by Suffolk Preservation Society who state *“SPS considers that the proposals are of a scale and character that will result in unacceptable impacts to a Valued Landscape, cause heritage harm, require the loss of best and most versatile land and a loss of amenity for those living and walking through this landscape. Furthermore, the proposals are contrary to both national and local planning policy”*.

While there may be some minor biodiversity gains in the proposal, on balance this huge application would cause significant harm to the very fabric of Bentley village, and the way it is experienced by residents and visitors and is contrary to Bentley’s adopted Neighbourhood Plan.

This application would be contrary to the following policies in Bentley’s Neighbourhood Plan and Babergh’s Joint Local Plan.

BEN 3 Development Design

- The proposals would harm the amenities of nearby residents and walkers by reason of noise, outlook and glint and glare.
- The designs do not respect the qualities and character of the setting of the village within a high quality, Valued Landscape.
- They do not maintain and enhance the quiet and tranquil character of the village and its setting.

BEN 7 Protecting Bentley’s Landscape Character

The proposals will impact the landscape character by development that will interrupt long distance views across the landscape particularly to the Engrly Wood and St Mary’s Church.

- Development on upper valley slopes will be visually intrusive.
- Erosion of rural lane character through introduction of new development with new junctions that will cause fragmentation of lanes due to the introduction of new access routes in Church Road and Potash Lane, which will also physically interrupt hedges.

The proposed site is part of the Shotley Peninsula Additional Project Area. No reference has been made in the submitted LVIA to the 2017 Natural England’s Evaluation of Natural Beauty in relation to the proposed Boundary Variation of the Suffolk Coast and Heaths or the 2020 Valued Landscape Assessments for Suffolk Coast and Heaths Additional Project Area.

The proposal is therefore contrary to Policy LP18 (3) in Babergh’s Joint Local Plan (Part 1) “Development within the AONB Project Areas should have regard to the relevant Valued Landscape Assessment”.

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Policy BEN 11 - Heritage Assets

The proposals will not preserve or enhance the significance of designated heritage assets of the Village, their setting, and the wider built environment;

- Or contribute to the Village's local distinctiveness, built form, and scale of its heritage assets;
- be of an appropriate scale, form, height, massing, alignment which respects the area's character, appearance, and its setting;
- proposals do not demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits.

The applicant's Heritage Impact Assessment significantly underestimates the impact on the heritage assets and their setting and so conflicts with policy LP19 in Babergh's Joint Local Plan.

Policy BEN 12 - Buildings of Local Significance

- The protection of buildings of local significance, including buildings, structures, features and gardens of local interest or of heritage interest, must be appropriately secured.

Bentley Parish Council believe the applicant's analysis doesn't fully consider the harm and loss that would be experienced by the listed Buildings of Local Significance adjacent to the site.

Babergh's Joint Local Plan LP19 (5) states "When considering applications where a level of harm is identified to heritage assets (including historic landscapes) the Councils will consider the extent of harm and significance of the asset in accordance with the relevant national policies. Harm to designated heritage assets (regardless of the level of harm) will require clear and convincing justification in line with the tests in the National Planning Policy Framework."