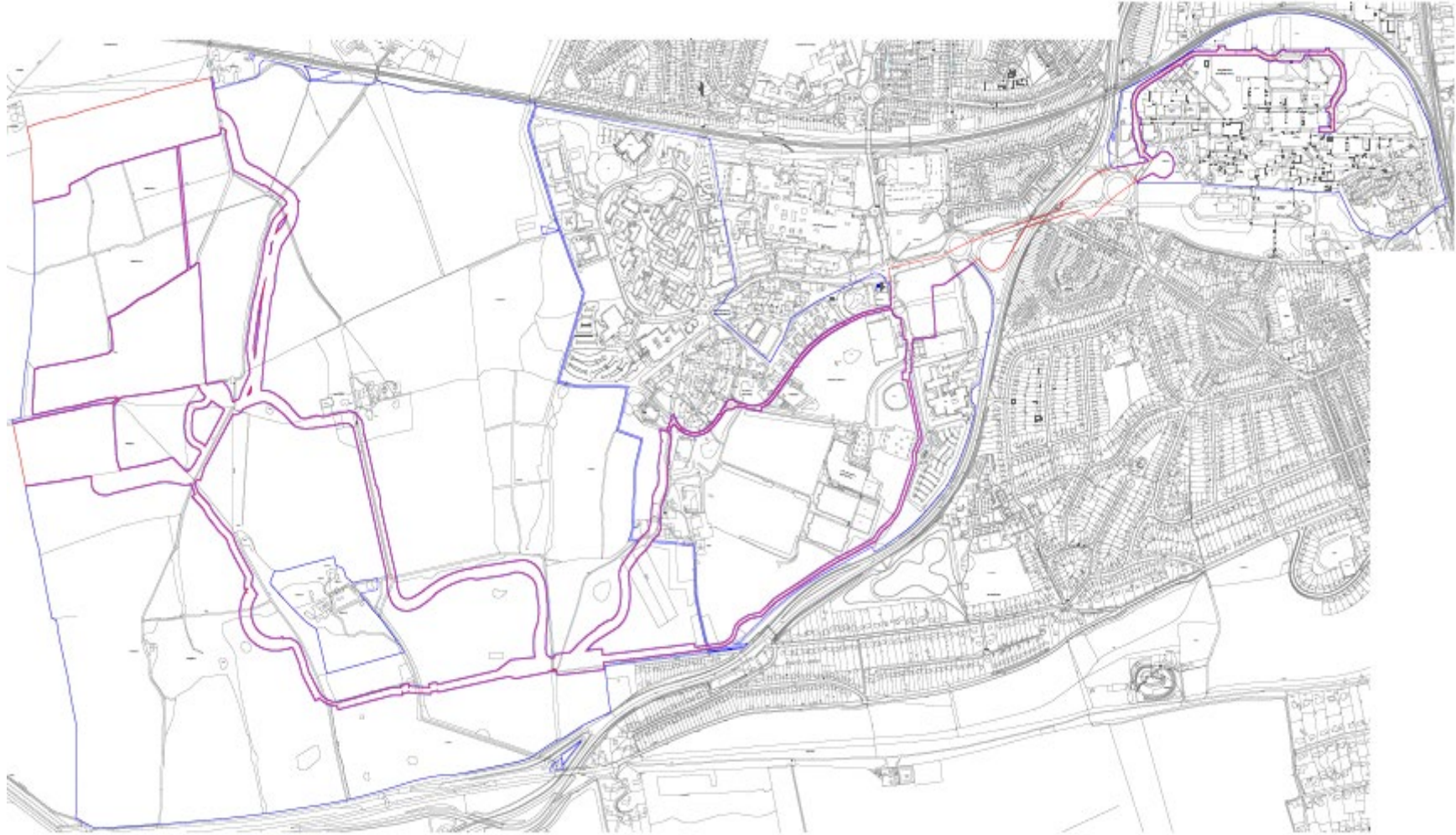


24/P/00441 – Land West of Blackwell Farm, Hogs Back, Guildford



App No: 24/P/00441
Appn Type: Full Application
Case Officer: Kelly Jethwa
Parish: Worplesdon
Agent : Mr Rogers
Tor & Co
Everdene House
Deansleigh Road
Bournemouth
BH7 7DU

8 Wk Deadline: 24/06/2024

Ward: Pilgrims
Applicant: SSE Energy Solutions and The University of Surrey
c/o SSE Energy Solutions: One Forbury Place
43 Forbury Road
Reading
Berkshire
RG1 3JH

Location: Land west of Blackwell Farm, Hogs Back, Guildford, GU3
Proposal: The installation of a 12.21 MWp 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.

Executive Summary

Reason for referral

This application has been referred to the Planning Committee by the Joint Assistant Director of Planning because more than 20 responses have been received contrary to the officer recommendation.

1.0 Key information:

- 1.1 The applicant is a joint application with SSE Energy and the University of Surrey applying for the development of a solar facility. The development proposal includes 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. The three solar facility parcels would be connected to one another by the access track and associated electrical infrastructure allowing for export of electricity to the Stag Hill Campus, east of the site. Permission is sought for a temporary period of 35 years at which time the apparatus will be removed from the land.
- 1.2 The application has been submitted following the withdrawal of 22/P/02178 for a similar proposal on the same site, this current application includes a revised access track route and the underground cabling route from the fields with the solar arrays, to the substation at Stag Hill.
- 1.3 The proposal has an installed capacity of 12.21MWp and will have an annual generation of around 8,25GWhr/yr for use by the University of Surrey as part of its net zero strategy to be carbon neutral by 2030. This is part of a wider energy strategy to reduce energy demands and decarbonise the University. This would be used to complement the existing roof mounted solar arrays and those that have been approved.

2.0 Executive summary:

- 2.1 Part of the site is in an Area of Great Landscape Value (AGLV) and other parts are a candidate area for the Surrey Hills National Landscape boundary review by Natural England. This review has been through an initial consultation with published responses. There are a number of public rights of way and permissive paths which cross the fields that form Blackwell Farm to the west of the Manor Farm.
- 2.2 Most of the site is located within the Green Belt. The access track and solar arrays would be inappropriate development in the Green Belt.
- 2.3 The applicant has demonstrated that they have looked at all the other potential options to meet their net-zero strategy. They have then worked to minimise the effects on the landscape, habitats, species, trees and heritage assets. Where the effects cannot be minimised, there would be suitable mitigation and enhancements to reduce any materially harmful effects.
- 2.4 The proposals would not lead to the permanent loss of agricultural land or best and most versatile land (BMV) as the fields would continue to be used for sheep grazing. The soil quality would be maintained and could be improved as it lies fallow. The land would be restored to its previous condition and use, when the solar arrays are cleared after the temporary use of 35 years.
- 2.5 There are no objections from any statutory or technical/specialist consultees.
- 2.6 The application has to demonstrate very special circumstances to outweigh the harm of inappropriate development in the Green Belt and public benefits to outweigh the less than substantial harm identified to the designated heritage asset. Also, the harm to the setting of the SHNL, candidate site for the SHNL and AGLV.
- 2.7 An assessment has been made of the public benefits and the very special circumstances. The contribution to the accepted national need for renewable energy carries substantial weight. There are also a number of economic, social and environmental benefits which cumulatively also identify the harm identified.
- 2.8 The delivery of this renewable energy development would contribute to the decarbonisation of the grid, improve the energy and financial security of the University and deliver a notable reduction in greenhouse emissions in the borough of Guildford and the county of Surrey.

RECOMMENDATION:

- (i) **That delegated authority be granted to the Assistant Director of Planning to grant permission and make minor amendments to the wording of conditions subject to the applicant entering into a Section 106 Agreement to secure:**
 - **Monitoring of onsite Biodiversity Net Gain (BNG)**
- (ii) **That upon completion of the above, the application be determined by the Joint Assistant Director of Planning. The recommendation is to approve planning permission subject to conditions.**

Approve - subject to the following condition(s) and reason(s):

No.	Condition																																																																																												
1.	<p><u>Time limit</u></p> <p>The development hereby permitted shall begin no later than three years from the date of this decision.</p> <p><u>Reason:</u> To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.</p>																																																																																												
2.	<p><u>Temporary development</u></p> <p>The permission hereby granted shall be limited to a period of thirty-five years from the date when electricity is first exported from the solar panels to the electricity network (The First Export Date). Written notification of the First Export Date shall be given to the Local Planning Authority within fourteen days of the event occurring.</p> <p><u>Reason:</u> To enable the Local Planning Authority to manage the site which is in the Green Belt and in the setting of a National Landscape.</p>																																																																																												
3.	<p><u>Drawing numbers</u></p> <table border="1" data-bbox="360 1037 1351 2024"> <thead> <tr> <th data-bbox="360 1037 528 1111">Date submitted</th> <th data-bbox="528 1037 914 1111">Drawing Number</th> <th data-bbox="914 1037 991 1111">Rev</th> <th data-bbox="991 1037 1351 1111">Plan</th> </tr> </thead> <tbody> <tr><td>March 2024</td><td>273201-TOR-P0001</td><td>-</td><td>Site Location Plan</td></tr> <tr><td>March 2024</td><td>273201-TOR-001</td><td>-</td><td>Existing Site Plan</td></tr> <tr><td>August 2024</td><td>273201-TOR-002</td><td>A</td><td>Proposed Site Layout – Overview</td></tr> <tr><td>August 2024</td><td>273201-TOR-003</td><td>A</td><td>Proposed Site Layout – Detail 1</td></tr> <tr><td>March 2024</td><td>273201-TOR-004</td><td>-</td><td>Proposed Site Layout – Detail 2</td></tr> <tr><td>March 2024</td><td>273201-TOR-005</td><td>-</td><td>Proposed Site Layout – Detail 3</td></tr> <tr><td>March 2024</td><td>273201-TOR-006</td><td>-</td><td>Proposed Site Layout – Detail 4</td></tr> <tr><td>August 2024</td><td>273201-TOR-007</td><td>A</td><td>Landscape Strategy Overview with contours</td></tr> <tr><td>August 2024</td><td>273201-TOR-008</td><td>A</td><td>Landscape Strategy – Detail 1</td></tr> <tr><td>August 2024</td><td>273201-TOR-009</td><td>A</td><td>Landscape Strategy – Detail 2</td></tr> <tr><td>August 2024</td><td>273201-TOR-010</td><td>A</td><td>Landscape Strategy – Detail 3</td></tr> <tr><td>August 2024</td><td>273201-TOR-011</td><td>A</td><td>Planting Plan 1</td></tr> <tr><td>August 2024</td><td>273201-TOR-012</td><td>A</td><td>Planting Plan 2</td></tr> <tr><td>August 2024</td><td>273201-TOR-013</td><td>A</td><td>Planting Plan 3</td></tr> <tr><td>August 2024</td><td>273201-TOR-025</td><td>A</td><td>Landscape Removal Strategy Overview</td></tr> <tr><td>August 2024</td><td>273201-TOR-026</td><td>A</td><td>Landscape Removal Strategy Detail 1</td></tr> <tr><td>August 2024</td><td>273201-TOR-027</td><td>A</td><td>Landscape Removal Strategy Detail 2</td></tr> <tr><td>August 2024</td><td>273201-TOR-028</td><td>A</td><td>Landscape Removal Strategy Detail 3</td></tr> <tr><td>March 2024</td><td>273201-TOR-029</td><td>-</td><td>Landscape Removal Strategy Detail 4</td></tr> <tr><td>March 2024</td><td>273201-TOR-030</td><td>-</td><td>Landscape Removal Strategy Detail 5</td></tr> <tr><td>August 2024</td><td>273201-TOR-LA/A(92)031</td><td>A</td><td>Fence Details</td></tr> <tr><td>March 2024</td><td>273201-TOR-LA/A(92)032</td><td>-</td><td>Gate Details</td></tr> </tbody> </table>	Date submitted	Drawing Number	Rev	Plan	March 2024	273201-TOR-P0001	-	Site Location Plan	March 2024	273201-TOR-001	-	Existing Site Plan	August 2024	273201-TOR-002	A	Proposed Site Layout – Overview	August 2024	273201-TOR-003	A	Proposed Site Layout – Detail 1	March 2024	273201-TOR-004	-	Proposed Site Layout – Detail 2	March 2024	273201-TOR-005	-	Proposed Site Layout – Detail 3	March 2024	273201-TOR-006	-	Proposed Site Layout – Detail 4	August 2024	273201-TOR-007	A	Landscape Strategy Overview with contours	August 2024	273201-TOR-008	A	Landscape Strategy – Detail 1	August 2024	273201-TOR-009	A	Landscape Strategy – Detail 2	August 2024	273201-TOR-010	A	Landscape Strategy – Detail 3	August 2024	273201-TOR-011	A	Planting Plan 1	August 2024	273201-TOR-012	A	Planting Plan 2	August 2024	273201-TOR-013	A	Planting Plan 3	August 2024	273201-TOR-025	A	Landscape Removal Strategy Overview	August 2024	273201-TOR-026	A	Landscape Removal Strategy Detail 1	August 2024	273201-TOR-027	A	Landscape Removal Strategy Detail 2	August 2024	273201-TOR-028	A	Landscape Removal Strategy Detail 3	March 2024	273201-TOR-029	-	Landscape Removal Strategy Detail 4	March 2024	273201-TOR-030	-	Landscape Removal Strategy Detail 5	August 2024	273201-TOR-LA/A(92)031	A	Fence Details	March 2024	273201-TOR-LA/A(92)032	-	Gate Details
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March 2024	273201-TOR-LA/A(92)034	-	Photovoltaic Array Panel Details
March 2024	273201-TOR-LA/A(92)036	-	Substation Details
March 2024	273201-TOR-LA/A(92)037	-	Switchgear Enclosure – Plans and Elevations
March 2024	273201-TOR-LA/A(92)038	-	Inverter Details 1 – Data Sheets
March 2024	273201-TOR-LA/A(92)039	-	Inverter Details 2 – Position on Panels
March 2024	273201-TOR-LA/A(92)040	-	Inverter Details 3 - Location of Inverters
August 2024	22093-6-Overview	-	Tree Protection Plan
August 2024	22093-6-1	-	Tree Protection Plan
August 2024	22093-6-2	-	Tree Protection Plan
August 2024	22093-6-3	-	Tree Protection Plan
August 2024	22093-6-4	-	Tree Protection Plan
August 2024	22093-6-5	-	Tree Protection Plan
August 2024	22093-6-6	-	Tree Protection Plan
August 2024	22093-6-7	-	Tree Protection Plan
August 2024	22093-6-8	-	Tree Protection Plan
August 2024	22093-6-9	-	Tree Protection Plan
August 2024	22093-6-10	-	Tree Protection Plan
March 2024	332110788-STN-HGN-DR- H-0008	P01	Haul Road Alignment – Visibilities Sheet 1 of 9
March 2024	332110788-STN-HGN-DR- H-0009	P01	Haul Road Alignment – Visibilities Sheet 2 of 9
March 2024	332110788-STN-HGN-DR- H-0010	P01	Haul Road Alignment – Visibilities Sheet 3 of 9
March 2024	332110788-STN-HGN-DR- H-0011	P01	Haul Road Alignment – Visibilities Sheet 4 of 9
March 2024	332110788-STN-HGN-DR- H-0012	P01	Haul Road Alignment – Visibilities Sheet 5 of 9
March 2024	332110788-STN-HGN-DR- H-0013	P01	Haul Road Alignment – Visibilities Sheet 6 of 9
March 2024	332110788-STN-HGN-DR- H-0014	P01	Haul Road Alignment – Visibilities Sheet 7 of 9
March 2024	332110788-STN-HGN-DR- H-0015	P01	Haul Road Alignment – Visibilities Sheet 8 of 9
March 2024	332110788-STN-HGN-DR- H-0016	P01	Haul Road Alignment – Visibilities Sheet 9 of 9
March 2024	332110788-STN-HGN-DR- H-0030	P01	Haul Road Alignment Cut and Fill Plan Section 1 Sheet 1 of 4
March 2024	332110788-STN-HGN-DR- H-0031	P01	Cut and Fill Plan Section 2 Sheet 2 of 4
March 2024	332110788-STN-HGN-DR- H-0032	P01	Cut and Fill Plan Section 3 Sheet 3 of 4
March 2024	332110788-STN-HGN-DR- H-0035	P01	Cut and Fill Plan Section 4 Sheet 4 of 4
April 2024	332110788-STN-HGN-DR-H-0034	P01	PRoW Crossings

Reason: To ensure the development is carried out in accordance with the approval and to ensure the quality of development indicated on the approved plans is achieved in practice.

4. Construction Transport Management Plan (CTMP)
 No development shall commence until a Construction Transport Management Plan (CTMP), has been submitted to and approved in writing by the Local

	<p>Planning Authority (in consultation with the County Highway Authority and National Highways).</p> <p>This shall include:</p> <ul style="list-style-type: none"> a) site access arrangements including temporary construction access routes within the site; b) parking for vehicles of site personnel, operatives and visitors; c) loading and unloading of plant and materials; d) storage of plant and materials; e) programme of works; f) the number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits; g) traffic management including daily hours of construction and deliveries to avoid staff arrivals/departures at the University of Surrey and Royal Surrey County Hospital; h) vehicle routing; i) measures to prevent the deposit of materials on the public highway; j) before and after construction condition surveys of the public highway and a commitment to fund the repair of any damage caused; k) on-site turning for construction vehicles; and l) site plan showing the temporary compound(s)/location(s) where all building materials, finished or unfinished products, parts, crates, packing materials and waste shall be stored during the construction phases. <p>The CTMP measures shall be implemented and maintained for the course of the development works.</p> <p><u>Reason:</u> In order that the development should not prejudice highway safety nor cause inconvenience to other highway users. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.</p>
5.	<p><u>Construction Environmental Management Plan (CEMP)</u></p> <p>No development (including demolition, groundworks and construction of the access track) shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved by the Local Planning Authority. This plan shall include the recommendations outlined in: Ecological Mitigation Strategy, Prepared by ECOSA, dated 14.08.2024 Ref: 22.0052.00014.F4 Arboricultural Impact Appraisal and Method Statement prepared by Barrell Tree Consultancy, dates 23.08.2024 Ref. 22093-AIA4-SolarArrayCableandHaulRoute-CA</p> <p>This shall include:</p> <ul style="list-style-type: none"> a) Phased clearance of trees and hedgerows used as habitats for nesting birds and dormice (in practicable locations); b) Risk assessment of potentially damaging construction activities; c) Identification of “biodiversity protection zones”; d) Practical measures (both physical measures including protective fences, exclusion barriers and warning signs and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements); e) The location and timing of sensitive works to avoid harm to biodiversity features;

	<p>f) The times during construction when specialist ecologists need to be present on site to oversee works;</p> <p>g) Responsible persons and lines of communication;</p> <p>h) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person;</p> <p>i) responsible persons and line of communication; and</p> <p>j) lighting requirements during construction, including location, height, type and direction of light sources and intensity of illumination;</p> <p>k) measures to prevent pollutants entering the groundwater; and</p> <p>l) measure to manage the effects of works within 500m of the dwelling at Wildfields Farm, including, noise, dust, vibration, lighting etc.</p> <p>The CEMP measures shall be implemented and maintained for the course of the development works.</p> <p><u>Reason:</u> In order to safeguard against the emission of noise, vibration and dust and protect the wildlife on the site and neighbour amenity. This is required to be a pre-commencement condition as these matters need to be agreed before development commences, in order to protect the amenities of the locality and by minimising impacts on habitats, biodiversity and the locality.</p>
6.	<p><u>Skylark mitigation strategy</u></p> <p>No development shall commence, until a Skylark Mitigation Strategy for 10 skylark plots has been submitted to and approved in writing by the Local Planning Authority to compensate for the loss of any Skylark territories at the site. This plan shall include the recommendations outlined in:</p> <p>Ecological Mitigation Strategy, Prepared by ECOSA, dated 14.08.2024 Ref: 22.0052.00013.F0</p> <p>Ecological Impact Assessment, Prepared by ECOSA, dated 11.03.2024 Ref: 22.0052.00014.F4</p> <p>Habitat Management and Monitoring Plan Prepared by ECOSA, dated 12.03.2024 Ref: 22.0052.00015.F0</p> <p>This shall include:</p> <p>a) evidence for the number of Skylark nest plots, prior to commencement of the development;</p> <p>b) the purpose and conservation objectives for the proposed Skylark nest plots;</p> <p>c) a detailed methodology for the Skylark nest plots;</p> <p>d) locations of the Skylark nest plots shown on appropriate maps and/or plans; and</p> <p>e) the persons or body responsible for implementing the Skylark Mitigation Scheme; and</p> <p>f) the timescale for maintenance and any long-term management.</p> <p>The development shall thereafter be carried out and maintained in accordance with the approved strategy.</p> <p><u>Reason:</u> To safeguard the skylark habitat of a protected species and provide suitable mitigation. This is required to be a pre-commencement condition as these matters need to be agreed before development commences, in order to minimise impacts on habitats and biodiversity.</p>

7.	<p><u>Badger mitigation and enhancement</u></p> <p>No development shall commence until a badger mitigation and enhancement strategy has been submitted to and approved in writing by the Local Planning Authority.</p> <p>This shall include:</p> <p>a) updated badger survey undertaken no more than six months prior to the commencement of any development; and</p> <p>b) mitigation and enhancement measures for the lifetime of development.</p> <p>Should the presence of badgers and their setts at the site change in the interim period then the mitigation measures shall take this into consideration and shall be implemented and maintained thereafter.</p> <p><u>Reason:</u> To safeguard the badgers and their setts which are protected by law and provide suitable mitigation and enhancements. This is required to be a pre-commencement condition as these matters need to be agreed before development commences, in order to minimise impacts on habitats and biodiversity.</p>
8.	<p><u>Updated bat roost survey</u></p> <p>No development shall commence until an updated preliminary ground level tree roost assessments for bats has been submitted to and approved in writing by the Local Planning Authority. This shall be undertaken no more than six months prior to the commencement of any development. Should the presence of bat roosts at the site change in the interim period then the mitigation measures shall take this into consideration and shall be implemented and maintained thereafter.</p> <p><u>Reason:</u> To safeguard the bats and their roosts which are a protected species and provide suitable mitigation and enhancements. This is required to be a pre-commencement condition as these matters need to be agreed before development commences, in order to minimise impacts on habitats and biodiversity.</p>
9.	<p><u>Tree protection measures</u></p> <p>No development shall commence and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until tree protection measures in accordance with: Arboricultural Impact Appraisal and Method Statement prepared by Barrell Tree Consultancy, dates 23.08.2024 Ref. 22093-AIA4-SolarArrayCableandHaulRoute-CA Tree Protection Plans (Ref. 22093-6 Overview and plans 1-10</p> <p>No development, or site preparation which would prior to operations have any effect on compacting, disturbing or altering the levels of the site, shall take place until a person qualified in arboriculture has been appointed to supervise construction activity occurring on the site. The Arboricultural Supervisor shall be responsible for the implementation of protective measures, special surfacing and all works deemed necessary to ensure compliance with the approved details.</p>

	<p>Within any area fenced in accordance with this condition, nothing shall be stored, placed or disposed of above or below ground, the ground level shall not be altered, no excavations shall be made, nor shall any fires be lit. The protection measures shall be maintained in accordance with the approved details, until all equipment, machinery and surplus materials have been moved from the site.</p> <p><u>Reason:</u> To protect and enhance the appearance and character of the site and locality and reduce the risk to protected and retained trees. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.</p>
10.	<p><u>Tree protection meeting</u></p> <p>No development (including demolition, groundworks and construction of the vehicular accesses) shall commence and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until a pre-commencement meeting has been held on site and attended by a suitable qualified arboriculturist, representative from the Local Planning Authority and the site manager/foreman, to check all tree protection measures have been installed in accordance with:</p> <p>Arboricultural Impact Appraisal and Method Statement prepared by Barrell Tree Consultancy, dates 23.08.2024 Ref. 22093-AIA4-SolarArrayCableandHaulRoute-CA Tree Protection Plans (Ref. 22093-6 Overview and plans 1-10)</p> <p>The tree protection measures shall be implemented and maintained for the course of the development works.</p> <p><u>Reason:</u> To protect the trees on site which are to be retained in the interests of the visual amenities of the locality. It is considered necessary for this to be a pre-commencement condition because the tree protection measures need to be checked prior to the development commencing to ensure they are adequately installed.</p>
11.	<p><u>Site Waste Management Plan (SWMP)</u></p> <p>No development (including demolition, groundworks and construction of the access track) shall commence until a Site Waste Management Plan (SWMP) has been submitted to and approved in writing by the Local Planning Authority, this must align with the DEFRA Non-statutory guidance for site waste management plans (2008).</p> <p>This shall include:</p> <ul style="list-style-type: none"> a) any waste generated by construction, reprofiling, demolition and excavation activities would be limited to the minimum quantity necessary; b) transportation of excess material offsite in accordance with the Transport Statement prepared by Stantec, dated 05.03.2024 Ref: 332110788 Rev A; c) opportunities for re-use and recycling of construction, demolition and excavation waste on the application site are maximised; and d) sufficient on-site facilities to manage waste (storage, reuse and recycling) arising during the operation of the development of an appropriate type and scale will be provided and maintained for the duration of the development. <p>The SWMP shall subsequently be kept up-to-date throughout the</p>

	<p>development process in accordance with established methodology. The SWMP measures shall be implemented and maintained for the course of the development works.</p> <p><u>Reason:</u> To ensure that the development takes waste hierarchy into account to manage waste. It is considered necessary for this to be a pre-commencement condition because waste will begin to be generated as soon as any development commences on the site.</p>
12.	<p><u>Drainage/ SuDS scheme</u></p> <p>No development (including groundworks) shall commence until details of the design of a surface water drainage scheme has been submitted to and approved in writing by the Local Planning Authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS.</p> <p>This shall include:</p> <ul style="list-style-type: none"> a) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+45% allowance for climate change) storm events, during all stages of the development. The final solution should follow the principles set out in the approved drainage strategy. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 1l/s (cumulative for all 3 parcels) for the 1 in 1 year rainfall event and 6.2l/s (cumulative for all 3 parcels) for the 1 in 100-year rainfall event; b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.); c) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk; d) Details of drainage management responsibilities and maintenance regimes for the drainage system; and e) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational. <p>The development shall be built in accordance with the approved details and thereafter maintained.</p> <p><u>Reason:</u> In order to reduce the impact of the development on flooding, manage run-off flow rates, protect water quality and improve biodiversity and the appearance of the development. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.</p>
13.	<p><u>Great crested newt district licence</u></p> <p>No development shall commence, except in accordance with the terms and conditions of the Council's Organisational Licence (WML-OR146).</p>

	<p><u>Reason:</u> In order to ensure that adverse impacts on great crested newts are adequately mitigated and to ensure that site works are delivered in full compliance with the organisational licence. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.</p>
14.	<p><u>Certificate for great crested newt compensation</u></p> <p>No development shall commence until a certificate from the delivery partner (as set out in the District Licence WML-OR146), has been submitted to and approved in writing by the Local Planning Authority confirming that all necessary measures in regard to great crested newt compensation have been appropriately dealt.</p> <p>This shall include:</p> <p>a) authorisation for the development to proceed under the District Licence; and b) the delivery partner certificate.</p> <p>The development shall be implemented in accordance with the approved details and thereafter maintained.</p> <p><u>Reason:</u> In order to ensure that adverse impacts on great crested newts are adequately mitigated and to ensure that site works are delivered in full compliance with the organisational licence. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.</p>
15.	<p><u>Landscape and Ecological Management Plan (LEMP)</u></p> <p>Prior to the removal of any trees, hedgerows or affected habitats, a landscape and ecological management plan (LEMP), shall be submitted to and approved in writing by the Local Planning Authority. The plan shall include the measures outlined in the:</p> <p>Ecological Mitigation Strategy, Prepared by ECOSA, dated 14.08.2024 Ref: 22.0052.00013.F0 Ecological Impact Assessment, Prepared by ECOSA, dated 11.03.2024 Ref: 22.0052.00014.F4 Habitat Management and Monitoring Plan Prepared by ECOSA, dated 12.03.2024 Ref: 22.0052.00015.F0 Landscape and Visual Impact Appraisal; prepared by tor&co, dated 04.03.2024 Ref: 273201 Doc L1 Issue 1 Planting plans - 273201 TOR-011 Rev A, 012 Rev A and 013 Rev A</p> <p>The plan shall include:</p> <p>a) a programme of advance planting of trees and hedgerows used as habitats for nesting birds and dormice including a timetable for implementation; b) badger gates in the perimeter fencing enclosing the three fields with solar arrays; c) provide canopy where practicable and necessary for connection / hop overs where severances in woodland and hedgerows for dormice (where the access track turns north westerly to Wildfields following the alignment of PROW footpath 479); d) ecological trends and constraints on site that might influence management; e) details of the ecological enhancements;</p>

	<p>f) appropriate management options and monitoring for achieving aims and objectives;</p> <p>g) prescriptions for management actions;</p> <p>h) details of maintenance and management regimes for each habitat type supported by a detailed map following the recommendations;</p> <p>i) preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);</p> <p>j) landscape maintenance for a minimum period of 35 years, including timings, work programmes, replacements etc.;</p> <p>k) details of the body or organisation responsible for implementation of the plan;</p> <p>l) how remedial measures shall be identified when aims and objectives are not being met;</p> <p>m) details of the legal and funding mechanism(s) by which long term implementation of the plan shall be secured by the developer with the management body responsible for its delivery; and</p> <p>n) finalised soft landscaping scheme including:</p> <p>i) a scaled plan showing all existing vegetation and landscape features to be retained;</p> <p>ii) landscape scheme overlaid with existing and proposed services;</p> <p>iii) existing and proposed soil levels at the base of each tree/hedgerow;</p> <p>iv) a schedule detailing sizes and numbers/densities of all proposed trees/plants including their species, numbers, sizes (age and form) and positions, grass seeded/turfed areas and written specifications;</p> <p>v) include local provenance native species and drought resistant species (where practicable);</p> <p>All approved details shall then be maintained in full and in accordance with the agreed timings and approved details.</p> <p>Depending on the time period between the completed ecological surveys and the commencement of development activities, updated survey works may be required prior to drafting this plan if they were carried out more than two years ago.</p> <p><u>Reason:</u> to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site.</p>
16.	<p><u>Management of PRowS</u></p> <p>Prior to the commencement of works on the access track measures for the protection and management of the public rights of way (PRow) network, shall be submitted to and approved in writing by the Local Planning Authority. This plan shall include the recommendations outlined in:</p> <p>Technical note: Response to SCC Highways Request for Further Information (GU/24/00441), prepared by Stantec dated 24.04.2024 Ref: TN002 Rev 1.0 PRow Crossings - 332110788-STN-HGN-DR-H-0034 Rev P01</p> <p>This shall include:</p> <p>a) a final drawing showing the position and widths of PRow, of the proposed crossing points;</p> <p>b) use of banksmen;</p> <p>c) signage;</p> <p>d) any temporary and permanent fencing, gates or other means of enclosure; and</p>

	<p>e) how surfaces would be protected and maintained at crossing points</p> <p>This shall be implemented in accordance with the approved details and maintained for the course of the development works or the lifetime of the development as appropriate.</p> <p><u>Reason:</u> To ensure the safety and convenience of users of the public rights of way (PRoW) network.</p>
17.	<p><u>Horizontal direct drilling (HDD) methodology</u></p> <p>No drilling shall commence until a methodology for the horizontal direct drilling (HDD) has been submitted to and approved in writing by the Local Planning Authority. This shall include the recommendations outlined in: Ecological Mitigation Strategy, Prepared by ECOSA, dated 14.08.2024 Ref: 22.0052.00014.F4 Arboricultural Impact Appraisal and Method Statement prepared by Barrell Tree Consultancy, dates 23.08.2024 Ref. 22093-AIA4-SolarArrayCableandHaulRoute-CA Tree Protection Plans (Ref. 22093-6 Overview and plans 1-10</p> <p>This shall include:</p> <ul style="list-style-type: none"> a) Minimising risk to tree roots; b) Mitigating the impacts on badger setts; c) Locations where ducts would be pulled through and opportunities to use these to run other utility cables e.g. power cables and fibre optic cables; d) Cable installation; e) Trenching in sections; f) Sectionalised approach of duct installation; g) Excavation and installation of jointing pits; and h) Cable pulling; <p>The methodology shall be implemented in accordance with the approved details and any mitigation measured maintained for the course of the development works.</p> <p><u>Reason:</u> In order manage the effects of the works to trees, woodlands, hedgerows and habitats.</p>
18.	<p><u>Reptile relocation</u></p> <p>Prior to the commencement of any development on the three fields for the solar arrays or the cable route or access track within 1500m of the field boundaries (whichever is sooner), a translocation exercise and destructive search exercise shall be undertaken in accordance with the para 3.7 of the Ecological Mitigation Strategy, Prepared by ECOSA, dated 14.08.2024 Ref: 22.0052.00013.F0. The works shall be carried out in accordance with the approved details.</p> <p><u>Reason:</u> To safeguard the reptile habitat of a protected species and provide suitable mitigation and enhancements.</p>

19.	<p><u>External details</u></p> <p>Prior to the commencement of development (other than ground works), full details of the layout and appearance of the following shall be submitted to and approved in writing by the Local Planning Authority. This must include the details of embodied carbon/ energy (environmental credentials) of all external materials:</p> <p>This shall include:</p> <ul style="list-style-type: none"> a) manufacturers specification for the solar photovoltaic panels including the non-reflective finish on the panels and frames; b) colour scheme of all plant, equipment, and buildings; c) signage stating security measures; d) CCTV cameras; e) fencing that follows the Secure by Design Guidance documents (as far as practicable); f) stone tracks to the transformer and switchgear locations; g) hardstanding (stone) surface of the access track; and h) any other associated infrastructure. <p>The details must not exceed the maximum dimensions shown on the approved drawings in condition 3. The development shall be constructed and thereafter maintained in accordance with the approved details.</p> <p><u>Reason:</u> To ensure that a satisfactory external appearance is achieved of the development.</p>
20.	<p><u>Archaeology</u></p> <p>Prior to the commencement of any development on the cable route a programme of archaeological monitoring set out in a Written Scheme of Investigation shall be submitted to and approved by the Local Planning Authority. The development shall be carried out in accordance with the approved details.</p> <p><u>Reason:</u> To ensure archaeological investigation(s) are carried out before any archaeological remains are disturbed by the approved development.</p>
21.	<p><u>Tree protection monitoring</u></p> <p>Prior to the removal of any of the approved tree protection measures in the Arboricultural Impact Appraisal and Method Statement prepared by Barrell Tree Consultancy, dates 23.08.2024 Ref. 22093-AIA4-SolarArrayCableandHaulRoute-CA. Written evidence of monthly monitoring and compliance by the pre-appointed Arboricultural Supervisor, shall be submitted to and approved in writing by the Local Planning Authority.</p> <p><u>Reason:</u> To protect and enhance the appearance and character of the site and locality and reduce the risk to protected and retained trees.</p>

22.	<p><u>Biodiversity Net Gain Plan (BNGP)</u></p> <p>Prior to the first export date, details of the Biodiversity Net Gain Plan (BNGP) shall be submitted to and approved in writing by the Local Planning Authority. This plan shall include the recommendations outlined in: Habitat Management and Monitoring Plan Prepared by ECOSA, dated 12.03.2024 Ref: 22.0052.00015.F0; Biodiversity Net Gain Design Stage Report Prepared by ECOSA, dated 11.03.2024 Ref: 22.0052.00016.F0</p> <p>This shall include:</p> <ul style="list-style-type: none"> a) habitat creation; b) provided in accordance with the submitted Biodiversity Metric (version 4.0), based upon a net gain of at least 23.79% for habitats, 48.88% for hedgerows, and 34.71% for watercourses, with trading rules satisfied; b) locations of proposed enhancement measures including maps and plans; c) persons responsible for implementing the enhancement measures; d) details of initial aftercare and long-term maintenance (where relevant) for a minimum of 35 years including timings, work programmes, replacements etc.; <p>The plan shall be implemented in accordance with the agreed timings and approved details and thereafter maintained.</p> <p><u>Reason:</u> To ensure that biodiversity gains are delivered in accordance with policy requirements in place at the time of decision-making for enhancement and improvements of habitats.</p>
23.	<p><u>Wildfire Risk Assessment</u></p> <p>Prior to the first export date, a wildfire risk assessment shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>This shall include:</p> <ul style="list-style-type: none"> a) Fuel management zones; and b) Wildfire response plan; <p>The development shall be implemented in accordance with the approved details and thereafter maintained.</p> <p><u>Reason:</u> to reduce the risk to habits, species and neighbouring residential properties from wildfire effects.</p>
24.	<p><u>Access track</u></p> <p>The access track shall not be first brought into use until, the following have been provided:</p> <ul style="list-style-type: none"> a) Laid with a hardstanding surface (this could comprise unbound material); b) Passing places; c) Visibility splays; d) Signage relating to speed of vehicles along the access route, passing places and prior warning of gated Rights of Way routes; e) Secure gates to facilitate Public Rights of Way routes across the haul route, with appropriate surfacing; and

	<p>f) Provision of drainage to ensure that the risk of flooding to the haul route, and Rights of Way areas, is minimised.</p> <p>The development shall be built in accordance with the approved details and thereafter maintained.</p> <p><u>Reason:</u> To ensure the safety and convenience of users of the public rights of way (PRoW) and local road networks.</p>
25.	<p><u>Service vehicle parking</u></p> <p>Prior to the first export date, details of where service vehicles would be parked and for vehicles to turn so that they may enter and leave the site in forward gear, shall be submitted to and approved in writing by the Local Planning Authority. The site shall be laid out in accordance with the approved details. Thereafter the parking and turning areas shall be maintained for their designated purposes.</p> <p><u>Reason:</u> To ensure the safety and convenience of users of the public rights of way (PRoW) network.</p>
26.	<p><u>Interpretive information</u></p> <p>Prior to the first export date, finalised details of interpretive information (information boards, signposts, sculptural or other features). Shall be submitted to and approved in writing by the Local Planning Authority. Based broadly on the document 273201-TOR-015 Levelling Up and Regeneration Act (LURA) - Potential Measures. The development shall be built in accordance with the approved details and thereafter maintained.</p> <p><u>Reason:</u> to further the purposes of the candidate area for the Surrey Hills National Landscape and contributions to the aims and objectives of the Surrey Hills AONB Management Plan.</p>
27.	<p><u>Drainage verification</u></p> <p>Prior to the first export date, a verification report carried out by a qualified drainage engineer shall be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system:</p> <ul style="list-style-type: none"> a) has been constructed as per the agreed scheme (or detail any minor variations); b) provide the details of any management company; c) state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls); and d) confirm any defects have been rectified. <p>The development shall be built in accordance with the approved details and thereafter maintained.</p> <p><u>Reason:</u> In order to reduce the impact of the development on flooding, manage run-off flow rates, protect water quality and improve biodiversity and the appearance of the development.</p>

28.	<p><u>Landscape implementation</u></p> <p>All approved landscaping details shall be carried out in the first planting and seeding seasons in accordance with the approved planting programme, and any retained or new trees, hedges, hedgerows or woodlands which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species. All landscape works shall be carried out in accordance with the guidance contained in British Standards.</p> <p><u>Reason:</u> To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality.</p>
29.	<p><u>External lighting</u></p> <p>No external form of illumination of the site shall be installed or used on the site other than low level lighting required on ancillary buildings during occasional maintenance and inspection visits.</p> <p><u>Reason:</u> To prevent adverse impacts on protected species, in particular bats and light pollution resulting from the proposed development works.</p>
30.	<p><u>Unexpected contamination</u></p> <p>If unexpected contamination is found at any time when carrying out the approved development it must be reported in writing to the Local Planning Authority. Development on the part of the site affected shall be suspended and an investigation and risk assessment must be undertaken to deal with contamination of land and/or groundwater, and where remediation is necessary a remediation scheme must be prepared to ensure that the site is suitable for the intended use (by removing unacceptable risks to human health, buildings and other property and the natural and historical environment). Following completion of the remediation scheme a verification report that demonstrates the effectiveness of the remediation carried out must be prepared and submitted for approval in writing by the Local Planning Authority. These approved schemes shall be carried out before the development is resumed or continued.</p> <p><u>Reason:</u> To ensure that risks from land contamination to the future users of land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.</p>
31.	<p><u>Decommissioning Construction Transport Management Plan (DCTMP)</u></p> <p>No decommissioning shall commence until details and specification for all works associated with the removal of the solar array, access track and cabling within a Decommissioning Construction Transport Management Plan (DCTMP) has been submitted to and approved in writing by the Local Planning Authority.</p>

	<p>This shall include:</p> <ul style="list-style-type: none"> a) site access arrangements including temporary construction access routes within the site; b) parking for vehicles of site personnel, operatives and visitors; c) loading and unloading of plant and materials; d) storage of plant and materials; e) programme of works; f) the number and sizes of vehicles visiting the site in connection with the decommissioning and the frequency of their visits; g) traffic management including daily hours of decommissioning traffic movements to avoid staff arrivals/departures at the University of Surrey and Royal Surrey County Hospital; h) vehicle routing; i) measures to prevent the deposit of materials on the public highway; j) before and after construction condition surveys of the public highway and a commitment to fund the repair of any damage caused; k) on-site turning for decommissioning vehicles; l) site plan showing the temporary compound(s)/location(s) where all building materials, finished or unfinished products, parts, crates, packing materials and waste shall be stored during the decommissioning phases; m) the restoration of the Public Rights of Way routes, to their previous condition; and n) the closure of the site access. <p>The DCTMP measures shall be implemented and maintained for the course of the development works or thereafter as appropriate.</p> <p><u>Reason:</u> In order that the development should not prejudice highway safety nor cause inconvenience to other highway users.</p>
32.	<p><u>Decommissioning scheme</u></p> <p>No later than six months prior to the expiry of the planning permission, or within six months of the cessation of electricity generation at the site, (whichever is the sooner), a programme of works for the removal of the development shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>This shall include:</p> <ul style="list-style-type: none"> a) a programme of works with timescales; b) a method statement for the decommissioning and dismantling of all equipment and surfacing on site; c) details of any items to be retained on site; d) a method statement for restoring the land to agriculture; e) timescale for the decommissioning, removal and reinstatement of the land; f) a method statement for the disposal/recycling/reuse of redundant equipment/structures including the solar panel modules, mounts posts and frames, cables, security cameras and mounting poles and perimeter fencing; and g) arboricultural method statement and tree protection details; h) an ecological decommissioning plan for the impacts on any habitats and species.

	<p>The scheme shall be undertaken in accordance with the approved details and timescales. The operator shall notify the Local Planning Authority in writing within three months following the cessation of electricity generation.</p> <p><u>Reason:</u> To manage the restoration and clearing of the site in the Green Belt and within the setting of the National Landscape. As well as the impacts on habitats and species.</p>
33.	<p><u>Soil Management Plan (SMP)</u></p> <p>No later than six months prior to the expiry of the planning permission, or within six months of the cessation of electricity generation at the site, whichever is the sooner, a Soil Management Plan (SMP) shall be submitted to and approved in writing by the Local Planning Authority. The SMP shall be prepared by a suitably qualified soils and agriculture expert. The expert should review the SMP and make recommendations as to the measures necessary to ensure the land is restored to its original condition at decommissioning, taking into account any updates in statutory or policy requirements. This shall include:</p> <ul style="list-style-type: none"> a) soil resource survey; b) site preparation; c) details of the handling and storage of soils during the construction, operational and decommissioning phases; d) import of construction materials, plant and equipment to site; e) appropriate storage, capping and management of soil; and f) testing and commissioning; <p>All decommissioning and site clearance shall be carried out in accordance with the approved details.</p> <p><u>Reason:</u> To ensure soils are safeguarded during the lifetime of the development, including a restoration and aftercare plan for the site after 35 years to return the site to the former land quality.</p>

Informatives:

1.	<p>This statement is provided in accordance with Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Guildford Borough Council seek to take a positive and proactive approach to development proposals. We work with applicants in a positive and proactive manner by:</p> <ul style="list-style-type: none"> • Offering a pre application advice service • Where pre-application advice has been sought and that advice has been followed we will advise applicants/agents of any further issues arising during the course of the application • Where possible officers will seek minor amendments to overcome issues identified at an early stage in the application process <p>However, Guildford Borough Council will generally not engage in unnecessary negotiation for fundamentally unacceptable proposals or where significant changes to an application is required.</p> <p>In this case pre-application advice was sought and provided which addressed initial issues, following the withdrawal of the previous application. The application has been submitted taking into account the advice that was given. Further issues were identified</p>
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	during the consultation stage and determination process of the application. Officers have worked with the applicant to overcome as these matters which were resolved, to allow for a positive recommendation.
2.	The applicant is advised to undertake a study to determine the interference levels on the SGN pipelines from steady state and fault conditions of the electrical infrastructure associated with the proposed development, taking into consideration the SGN pipeline(s) and associated equipment. If required, the applicant shall also design appropriate mitigation to ensure that any induced fault voltage is within appropriate limits (in accordance with BS EN 50122-1) at the detailed design stage.

Officer's Report

3.0 Site description:

- 3.1 The proposed solar facility would be located on land to the west of the Guildford urban area (approximately 800m from the Surrey Research Park), on the University of Surrey's estate the application site is adjoin to the Blackwell Park Local Plan site allocation (policy A26), for mixed residential development. The land comprises a mix of farmland and small woodlands in the west, with remnants of a designed landscape at Down Place, and further east the terraces of the playing fields at the edge of the University of Surrey, Manor Park campus.
- 3.2 The site lies north of the Hogs Back (A31) and south of the railway line on the Reading to Redhill route of the North Downs Line.
- 3.3 The development would be in a proximity to the Grade II Listed Wildfields Farmhouse and the Scheduled Monument, moated site at Manor Farm, (this was one of the principal lodges associated with the historic Deer Park). The site is also identified by Surrey County Council as a County Site of Archaeological Importance (CSAI) and is the focus of a larger area of high archaeological potential (AHAP). There is a surviving section of the park pale (a local historic field boundary feature) at the south western corner of the site and the access track leading through Manor Farm from the south to the 12th century and the original creation of the deer park.
- 3.4 Wood Street Village Conservation Area lies approximately 0.57km north of the railway line and Onslow Village Conservation Area is approximately 250m south east from the application site, separated by the A3 motorway.
- 3.5 The entire solar array sits within the Green Belt, close to the western edge of the Guildford urban area. The northern field has a shared boundary with the current urban area boundary as shown on the Local Plan policies map. The associated access track and cable route sits partially within the Green Belt and partially within the defined Guildford urban area, in the University site.
- 3.6 The Surrey Hills National Landscape (SHNL) (formerly Area of Outstanding Natural Beauty, AONB), extends north of the Hog's Back. The application site falls within the area that is the subject of review by Natural England as part of a boundary review (excluding the site allocation). The Area of Great Landscape Value (AGLV) partially covers the land further north from the existing NL boundary and its extent follows the field and woodland boundaries.
- 3.7 The undeveloped parts of the site are within the E1: Rydeshill-Fairlands of the Rural-Urban Fringe Guildford Landscape Character Areas, with the rising land

to the south of the site lying within B1: Hog's Back Rural Urban Fringe. The parts within the urban area fall within Townscape Area 10B: Royal Surrey County Hospital (Townscape Type – Institutional Buildings associated with Open Space) and Area 10A: University of Surrey (same Townscape Type as Area 10A).

- 3.8 The area is within a Surrey Biodiversity Opportunity Areas - Wanborough and Normandy Woods and Meadows - Thames Basin Lowlands (TBL01). There is a Site of Nature Conservation Importance (SNCI) at Backside Common on adjacent land, to the north of the northern field.
- 3.9 There are fragmented areas of ancient woodland adjoining or close to the proposed development. These are on Natural England's Inventory of Ancient Woodland. The largest is Manor Copse between the site allocation and Manor Farm.
- 3.10 The land to the west of Bean's Bottom and Beechcroft Drive is in a Surface Water Drinking Water Protected Area, where raw water is abstracted for human consumption.
- 3.11 The entire site is within flood zone 1 with a low risk of flooding and within the 400m to 5km buffer of the Thames Basin Heaths Special Protection Area.
- 3.12 There are public rights of way (PROW) near the site, these being footpath 452, footpath 479 adjacent to the northern field, and bridleway 477. There is a Definitive Map Modification Order (DMMO) application currently being investigated by the County to add an east-west footpath/bridleway to the definitive map, known as "West Flexford Lane", this would join footpath 453 to footpath 446.
- 3.13 The 'site' comprises three distinct agricultural parcels, currently in agricultural use, two to the south and one to the north of Wildfield Copse:

Little Misley: The southernmost field sits closest to the A31, 0.65km from the northern boundary of the existing Surrey Hills NL and an AGLV and covers 4.5ha in a rectangular shape. It sits in the foreground of Wildfield Copse and adjoins Misley Copse a smaller, triangular area of ancient woodland to the east. There are hedgerows and trees along the site boundaries

Big Misley: The central parcel and larger than Little Misley covering an 'L' shaped area of 8.9ha. While adjacent to Little Misley it is separated by a farm track and a mature hedgerow/tree boundary. Wildfield Copse provides the immediate backdrop to this parcel while also extending to envelope it to the east and west. The aforementioned smaller Misley Copse meanwhile sits centrally in the foreground of southern views of the parcel. A strip of ancient woodland also lies along the western boundary and another east, along the western edge of Bridleway 447.

Wildfields: the northern most field covers 8.3ha in area and has been set aside from arable cultivation, so is semi-improved grassland. Wildfield Copse sits adjacent to the south as its southern boundary. A further wooded area at Backside Common, and railway line lie north of this parcel with residential development (Bushy Farmhouse) northwest and Wildfields Farm (including grade II listed farmhouse) to the north east.

4.0 Proposal:

- 4.1 The application seeks full planning permission for ground-mounted fixed solar panels and associated infrastructure. Temporary permission is sought to enable the operation of the facility for 35 years with decommissioning at the end of its lifespan. The proposed new solar facility will have a total installed capacity to generate up to 12.21MW and will have an annual generation of around 8.25GWhr/yr for use by the University to help it achieve net zero carbon emission goal.

Details

- 4.2 The application site (red line boundary) is approximately 45.86 hectares (ha) in area comprising:
- 32.88 ha = solar array, site access track and some parts of the export electricity cable route where this interacts with the solar site and access
 - 12.98 ha = export cable only
 - 21.7 ha = solar facility (photovoltaic panels and associated transformers and switchgear)
 - 5.7ha = covered by PV panels, approximately 26% of the total fields area.
 - 87.4sqm = the posts of the PV frames, transformers and switchgear enclosures, approximately 0.04% of the area of the three fields.

Access

- 4.3 The proposed access enters the site from the public highway at Egerton Road, then uses the University's existing private estate roads (Richard Meyjeys Road, Daphnie Jackson Road and Francis Crick Road). It would then utilise the existing junction off Francis Crick Road to access the track that currently serves the University's Veterinary School Pathology Centre and Clinical Skills Building.
- 4.4 From this point a new junction to the south of the Francis Crick Road would lead onto the proposed access track, parallel to the existing track, through an area that is currently used for soil storage, before re-joining the existing track south of the Manor Farm complex. This separate route is proposed, instead of widening the existing Manor Farm access as this would have required the removal of hedges and would have had a greater impact on the Scheduled Monument, as well as avoiding the PRow.
- 4.5 Beyond this point a further new section of engineered track, would run in a south west direction across a paddock (known as Strawberry Field), before passing through an existing gap in the park pale. The track then turns northwards and westwards along the edge of the agricultural field before joining the existing Blackwell Farm access track that runs northwards. The routing has been dictated primarily by the ecological buffers around the trees, hedges, Ancient Woodland and badger sett, following the existing topography of the land to limit the need for earthworks and minimising the impact on the heritage assets. A Park Pale would be crossed towards its southern end where the level differences are more gradual.
- 4.6 Just south of Blackwell Farm a new section of track would be created running eastwards towards the solar fields around the perimeter of agricultural fields. This section would cross PRow BW447 through this location perpendicularly,

so sufficient crossing visibility splays would be provided to ensure adequate visibility and safety of users of that bridleway. Appropriate signage would be implemented during the construction stages of the haul route to highlight PRow crossing points.

- 4.7 At this point the access track would divide to provide access to each of the three solar fields. A spur would leave this new track southwards across a field to the southern field (Little Misley) and a further spur would head east across a field to the middle field (Big Misley). This spur runs adjacent to the PRow BW447, segregation between the haul route and BW447 would be provided to ensure limited impact on the bridleway.
- 4.8 Another spur would head north across fields and alongside a short stretch of woodland to reach the northern field. This track would pass through the edge of land in the site allocation (A26) and cross PRow BW447 perpendicularly through the less dense wooded area, subsequently accessing to the northern solar facility parcel and crossing the PRow FP479.
- 4.9 Other parts of the access route also run through land allocated for development in the Local Plan for a mixed-use urban extension (A26 and A27).
- 4.10 The access tracks would be predominantly a single carriageway except in certain locations the track widens to enable two vehicles to pass, or passing bays would be provided. There will be no engineered aprons, kerbs or track lighting and use a proportion of recycled and/or secondary aggregates.
- 4.11 The access track would cross the site allocation of Blackwell Park to the east. The applicant states that it is anticipated the once the development of site A26 and A27 is underway in the vicinity of the solar access track then this track will be superseded by the new development layout. Solar facility maintenance vehicles (and those required for the future decommissioning of the facility) will then reach the solar fields via new routes created within the approved layout. As such the proposed access track will not prejudice the area available for the development of the mixed-use urban extension or the ability to implement it. In the unlikely event that those proposals were not delivered the access track would solely serve the solar facility development.
- 4.12 For the avoidance of doubt there will be no use of Chalk Pit Lane or the Chalk Pit Lane/A31 junction for construction, operation, or decommissioning vehicles.

Cabling

- 4.13 A circa 6.0km underground cable would be required to provide a connection between the proposed solar arrays and the existing substation at the Stag Hill Campus of the University.
- 4.14 This route would be different to the access track and would run along the western edge of the fields in Blackwell Farm adjacent to the Ancient Woodland. The route then runs east across the fields south of the Blackwell Park allocation and into the Manor Park campus along its southern boundary with the A3.
- 4.15 The route for the underground export cable includes areas of existing hard standing (road), amenity grassland, recreation land and agricultural land on the University's estate across Stag Hill, Manor Park and Blackwell Farm. Along the field edges, through an existing field access on the former deer park boundary

at Manor Farm, to the south of the Surrey Sports Park and terraces of sports pitches, north to the proposed construction compound at the roundabout on Egerton Road, across the A3 and along Perimeter Road to the substation at the Phillip Marchant Building at Stag Hill.

- 4.16 Part of the site to the south of the sports pitches at Manor Park is part of a Suitable Alternative Natural Greenspace (SANG) associated with the student residences, and the field north of Beechcroft Drive is used for informal recreational access. The route also crosses public rights of way.
- 4.17 Along Egerton Road a Section 50 Licence would be sought from the CHA for alternatives to Horizontal Directional Drilling (HDD) due to the potential impact on the A3 flyover.
- 4.18 Throughout the route, HDD would be used in limited sections under existing roads, trees, and hedgerows. The majority of the cable route would be installed through open excavation and/or cable ploughing. The ploughing installation is a non-intrusive methodology and does not create spoil material.
- 4.19 HDD would be required to connect the northern and middle fields. The applicant has agreed to a minimum of 3.0m below existing ground level to minimise potential for tree root disturbance under the woodland of Wildfield Copse (not Ancient Woodland).
- 4.20 The spoil waste material from the areas where HDD is used would need to be transported off site.

Panel Arrays

- 4.21 Rows of photovoltaic (PV) panels on metal frames that would face south and have an angle of around 25 degrees to the ground. There would be gaps between the rows to prevent overshadowing and to allow access around them for maintenance. The fields occupied by panels would be enclosed by fencing.
- 4.22 No panels would be installed under an overhead power line which runs diagonally across the eastern end of the northern field (Wildfields). Instead this area would be planted with species-rich grassland and scrub, and a new wildlife pond would be created.
- 4.23 These would be fixed system of PV panels, that would typically be approximately 2.3m long and 1.2m wide, with cells located below a layer of toughened glass. The panels would be dark blue / black in colour and have a non-reflective covering. Each panel is then enclosed within a module frame, typically built from anodised aluminium or steel. The metal frame would be tilted southwards, so that the bottom of each panel would be about 0.8m from the ground, whilst the top would be about 3.0m above ground. The metal posts of the framework would be driven into the ground.
- 4.24 About 22,410 panels would be laid out in rows running across the site from east to west, facing southwards, and there would be a gap of up to about 5.3m between each row. This would provide space for the proposed grassland, wildlife corridors and for sheep grazing.

- 4.25 Access tracks would run within each field for site maintenance. Stone tracks would only be used for access to the transformer and switchgear locations, and all maintenance vehicle access in each field beyond these would be on the grass.
- 4.26 The use of tracking/ moving panel system was initially considered, but this proved to be less efficient than a fixed system and would have introduced potential issues with increased noise and undesirable glint and glare.

Transformers, inverters and switchgear

- 4.27 The PV panels would generate direct current that would need to be converted to alternating current using inverters. The generated electricity would then be converted from low voltage to medium voltage via transformers for export via cable.
- 4.28 There would be three freestanding medium voltage (MV) transformer, one in each field. Each would be about 6.1m wide by 2.5m deep and 2.9m high, on a plinth that would be 0.3m above ground level.
- 4.29 Glass Reinforced Plastic (GRP) enclosure on the middle field (similar to the kiosks associated with mobile phone masts), housing High Voltage (HV)/Low Voltage (LV) switchgear. These would be about 6.1m wide by 3m deep and 3m high, on a plinth 0.2m above ground level.
- 4.30 There would be several inverters located across the facility, 13 in the northern field, 14 in the middle field, and 8 in the southern field, totalling 35. As these would be attached above ground level (and below the PV panels) to the frames holding the panels, these would not have a footprint on the ground.

Means of enclosure

- 4.31 2.4m high deer proof fencing around the perimeter of each of the three fields, with wooden posts and wire mesh, including gated access.
- 4.32 There would be cameras and motion detection equipment to monitor the site and their locations are shown on drawing no. 272301-TOR-00 Rev A.

Spoil removal and import

- 4.33 The existing mound of stored inert material at Manor Farm this would form section 2 of the access track. The site is to the west of the Schedule Monument and is in the urban area.
- 4.34 This would be reprofiled using cut and fill, enabling a gradual, ground level change. A cut and fill calculation exercise has been carried out and the reprofiling of this spoil area is forecast to result in approximately 1,231m³ of material cut and 200m³ of material fill. This equates to an overall quantity of material requiring transportation of 1,431m³. Excess material excavated through the construction works would be suitably relocated off-site.
- 4.35 The earthworks for the haul route from Manor Park to each of the solar array fields has been estimated to be a cut of 1,692m³ of material and a fill of 1,985m³ of material. This equates to an overall quantity of material requiring transportation of 3,677m³.

- 4.36 There would be thickness of 600mm for the material on the surface of the access track for its entire length. 11,533.06m³ of material would be required to be imported to the site.

Landscaping and biodiversity enhancements

- 4.37 Further enhancement of the proposed planting on the southern boundary of Little Misley solar field, would create a 10m depth of woodland planting. As screening when seen from the SHNL to the north along the Hog's Back.

- 4.38 The scheme would deliver a Biodiversity Net Gain (BNG) of more than 20%, which would be managed for the lifetime of the solar facility (a period of 35 years, exceeding the legal minimum of 30 years). The landscape, ecological and BNG enhancements include proposed:

- Native woodland planting
- Wildflower meadow
- Tussocky grassland
- Enhanced grassland margins
- New pond and aquatic planting
- New and reinforced hedgerows
- Native tree planting
- Enhanced ditch watercourses and use of swales

- 4.39 Key mitigation measures to minimise the predicted impacts of the development:

- Retention and management of existing boundary hedges, trees and woodland;
- Minimised removal of existing vegetation;
- Avoidance of development or working areas in root protection areas (RPAs) or within 15m buffer of ancient woodlands;
- Introduction of new hedgerows - including new native hedgerows alongside the existing retained hedgerows on the southern, eastern and northern boundaries of Little Misley, the southern boundary of Big Misley and the eastern and western boundaries (and limited sections of the north and south boundaries) of the Wildfield Field. In addition hedgerows would be planted alongside sections of the new access track where appropriate;
- Species rich grassland on fields of solar arrays;
- Grassland between fence line and existing hedgerows or woodland;
- Four new areas of new native woodland - One in the north east corner of the Wildfield Field, a woodland belt at the western end of Wildfield Field, between the access track and an existing hedgerow that extends south eastwards from Misley Copse, and in northernmost corner of Big Misley; and
- Pond - north east corner of Wildfield Field.

Construction phase

- 4.40 Construction is expected to take place over approximately 10 months and it is anticipated that construction vehicles associated with the proposed development would travel from the A3 motorway. All vehicles would then route onto the public highway at Egerton Road, onto roads on the University campus and then by means of section of new access track (similar in nature to agricultural farm tracks) and the use of existing sections of access roads to the solar facility.

- 4.41 The PROWs may have to be diverted during construction. Otherwise, the gates could be closed and secured during evenings and weekends to provide the separation between construction vehicles and users of the PROW.
- 4.42 There would be on-site welfare compounds located periodically along the access track during construction stages. These would be used for car parking for construction staff, construction laydown, construction equipment / tools storage, welfare facilities and construction waste management.

Operational phase

- 4.43 Once installed, the solar farm would require infrequent visits for the purposes of maintenance or cleaning of the site. Such work typically requires around one visit to the site per month, made by light van or 4x4 type vehicles. The facility would be unmanned, being remotely operated and monitored.
- 4.44 Where the PROW crosses the access, the crossings would be at grade and any drainage features accommodated for to allow easy and safe access for all PROW users. It is anticipated the gates could be closed and secured across the haul route for most of the time. These would then be manually unlocked and opened briefly when someone is visiting the site.

Decommissioning phase

- 4.45 The proposed development would export renewable energy to the University and the National Grid for a period of 35 years. The scheme, including the supporting framework for the solar panels, is fully reversible. These structures would be removed from the site and the land reinstated to agricultural use. Most of the component parts, including the aluminium framework and silicon in the module panels, are capable of being recycled. The landscape and biodiversity mitigation and enhancement measures would remain.
- 4.46 During the course of the application amended and additional information was received in relation to:
- Green Belt, very special circumstances;
 - in context of the Surrey Climate Change Strategy, Surrey Adaptation and Resilience Strategy and Greener Future Climate Change Delivery Plan;
 - suggested alternative locations, layouts and technologies and generating capacity;
 - review of national and local energy/planning policy frameworks including draft NPPF, ministerial statements, relevant case law (in respect to downstream emissions including Finch);
 - need for lifetime carbon assessment;
 - revised photomontages;
 - national landscape and Levelling Up and Regeneration Act (LURA) 2023 requirements;
 - best and most versatile (BMV) land and food security matters in context of ministerial statements;
 - updated biodiversity net gain information, including responses to ecological consultees, updated ecological reports and approach to district licensing for great crested newt;

- safeguarding of ancient and veteran trees, including methodology for horizontal directional drilling (HDD) and application of buffer zones;
- highways, including national highways and public rights of way;
- air quality management areas;
- means of site enclosure;
- UK Power Networks (UKPN) and Network Rail assets;
- effects of underground electricity cable;
- approach to managing and working in proximity to gas mains;
- equestrian related matters;
- strengthening of landscape planting along the southern edge of the Little Misley solar field, to 10m depth woodland planting (previously 3m);
- electricity cable connecting the Big and Little Misley solar fields would be laid by HDD (rather than cable plough);
- commitment to adopting a minimum HDD depth of 3m as a precautionary approach;
- provide interpretation boards/information at suitable publicly accessible locations.

5.0 Community engagement:

- 5.1 The applicant has submitted a Statement of Community Involvement. This document outlines the programme of community engagement and public consultation. This covers the period from June 2022 to March 2024 when this application was submitted. This period included the application that was subsequently withdrawn by the applicant (22/P/02178).
- 5.2 Public exhibitions were held at two venues in June 2022 and July 2022. Invitations were sent by post to 3,161 local addresses to the first event and the second event was locally publicised.
- 5.3 The applicant has approached the following stakeholders:
- Borough councillors in the wards of: Worplesdon, Shalford, Onslow, Westborough and Wanborough;
 - County councillors for Shalford and Guildford West;
 - Parish Councillors for Worplesdon, Shalford and Compton
 - Other Guildford Borough Council Councillors and officers
 - Angela Richardson, MP for Guildford (until July 2024)
 - Zero Carbon Guildford
 - Surrey Hills AONB planning adviser
 - Surrey Wildlife Trust
- 5.4 Individual meetings were also held with local residents, including the owners of Wildfields Farm and other nearby neighbours.
- 5.5 50 people attending the first public exhibition on 11.06.2022, the second event on 14.07.2022 was attended by approximately 10 pupils, parents, teachers and nearby residents.
- 5.6 Following feedback from local residents, the transformer and switchgear has been relocated to a position in the northern field further away from local residents properties.

- 5.7 Before this application was submitted a newsletter was sent by post to 1,098 neighbouring residential properties and briefings with relevant local parish councils.
- 5.8 This was in addition to the pre-application advice sought from the Local Planning Authority (LPA).

6.0 Relevant planning history:

Reference:	Description:	Decision Summary:
23/P/00218	Certificate of Lawfulness for a proposed development to establish whether the installation of solar photovoltaic panels with a capacity of 910 kWp on the roof of the Surrey Sports Park building would be lawful.	Granted 04/07/2023
23/W/00033	Prior notification under Schedule 2, Part 14, Class J of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) to determine if prior approval is required for installation of 1,979 solar panels on Surrey Sports Park building.	Granted 28/06/2023
22/P/01429	Proposed construction of a new three storey Energy Centre Building to be situated in the existing Senate House Car Park (use class F1 - non-residential education & training institution).	Granted 07/09/2023
22/P/02178	The installation of a 12.21 MWp solar facility comprising ground mounted solar photovoltaic panels and associated infrastructure including inverters, transformers, a GRP switchgear enclosure, fencing, infrared cameras, motion detection system, underground cable connections, access works including new tracks, and landscape planting.	Withdrawn 03/04/2024
22/S/00003	Request for an EIA Screening Opinion under the 2017 EIA Regulations in respect of solar farm at land to the west of Blackwell Farm, Guildford.	Not EIA development
14/P/01344	Variation of condition 2 (approved drawing nos.) of 13/P/01381, granted 19/11/13, showing design changes to VSM (formerly VS1), VSP (formerly VS2) and VSC (formerly VS3) buildings. These amendments include, but are not limited to: repositioning 0.5m lower, addition of photovoltaic panels and increase in gross internal area of VSM (VS1); increase in gross internal area and alterations to cladding panel and fenestration to VSP (VS2); change from a timber to steel structure and an increase in the gross internal area to VSC (VS3) building; and other revisions to fenestration and external treatment across the development.	Granted 08/10/2014
06/P/02304	Reserved Matters Application pursuant to outline planning permission 02/P/02505 for the construction of a new sports complex, including a new sports building, swimming pool, an indoor tennis facility, eight outdoor tennis courts, 2 all-weather pitches, car and coach parking, access road and associated landscaping following demolition of existing sports centre.	Granted 31/01/2007
06/P/00239	Prior Notification Under Part 6 of General Permitted Development Order (Agricultural Buildings and Operations)	Granted 28/02/2006

	(1995). Formation of an agricultural track between Manor Farm Complex and the existing track to Blackwell Farm, University of Surrey.	
02/P/02505	Outline Planning Application for student and staff residences, buildings for research and academic purposes, support services, sports facilities, landscape and other associated works.	Granted 17/05/2004

[officer comment: 22/P/02178 was withdrawn by the applicant after the proposed vehicular access could not be achieved as shown. That application did not include the cabling route. A new application was required due to the significant changes to the red line.]

7.0 Consultations:

Statutory consultees

7.1 Natural England (NE): have made the following comments:

- potential for significant effects on a National Landscape
- potential for significant effects on agricultural land
- suggested conditions in relation to screening, long-term enhancements, soil management plan
- LPA should be satisfied the development would seek to further the statutory purposes of the SHNL, under Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act (LURA) 2023
[Officer comment: none of the application is in the SHNL however is in a candidate area this shall be considered]

7.2 County Highways Authority (CHA): no objection in terms of highway safety, capacity and policy grounds and have made the following comments:

- Satisfied with the proposed access route subject to conditions
- Vehicle access would reduce depending on the stage of work within the site
- The routes to/from the site would need to be restored to their existing condition at the end of the use
- Satisfied with the proposed gated system to the PROWs where they cross the access track
- Definitive Map Modification Order (DMMO) application currently being investigated by the County to add a footpath/bridleway to the definitive map, known as "West Flexford Lane" - if successful, the claimed path would cross the vehicle access route and the applicants must consider how this would be achieved whilst maintaining the safety of the public potentially using the route
- Suggested conditions in relation to construction management, access route, decommissioning management service vehicle parking and EV charging.
- A Section 50 License would be required for the implementation of the cable route on Egerton Road

7.3 Lead Local Flood Authority (LLFA): no objection subject to a condition, and have made the following comments:

- During detailed design, consideration should be given to removing the long lengths of pipe run in parcels 1 and 2

7.4 Historic England (HE): have made the following comments:

- seek the views of your specialist conservation and archaeological advisers

- 7.5 National Highways (NH): have made the following comments:
- The majority of the cable route would be within Blackwell Farm, however, horizontal drilling was initially required beneath the A3 and Cathedral roundabout to connect it to the sub-station at the Stag Hill campus
 - The CHA have confirmed that they would issue a Section 50 street works licence for open excavation cable installation in Egerton Road, beneath the A3 flyover
 - [officer comment: this would reduce the risk to the A3 flyover compared to horizontal drilling]
 - Suggested condition in relation to construction management

External consultees

- 7.6 Surrey Hills AONB Planning Adviser (on behalf of the Surrey Hills National Landscape Board): have made the following comments:

- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites, remove southern, smaller ‘Little Misley’ field
- Premature of National Landscape review
- Assessments from specialist landscape consultants to inform National Landscape review are a material consideration
[officer comment: these documents have no weight in terms of decision making, instead they form the evidence base]
- Granting this would affect the candidate status for a National Landscape designation
- Harm to setting of a National Landscape
- Inefficient use of land – inefficient panels, space
- Harm to AGLV
- Harm to visual amenity from PROWs
- Harm to setting of a National Landscape
- Loss of agricultural land
- Limited BNG benefits
- Change to previously developed land
[officer comment: this is a temporary use and a remediation strategy following decommissioning would be necessary]
- Would not achieve net zero objective
- Additional screening to Little Misley field would provide limited screening benefits and take time to mature
- Interpretation boards would not outweigh the magnitude of the proposal
[Officer comment: the boards are to address the requirement under S245 of the LURA which is to further the purposes not to outweigh the harms]

- 7.7 Surrey Wildlife Trust: have made the following comments:

- Attended a site meeting on 18.05.2023;
- Following previous comments on the application had a meeting with the applicant’s ecologist and officers on 10.06.2024;
- Suggested conditions in relation to: wildfires, CEMP, LEMP, district licence, bat roost survey, badger surveys and mitigation, advance planting, phased clearing, hop-overs for dormice, reptile mitigation, BNG plan, soil management and decommissioning plan.

- 7.8 NatureSpace Partnership: have applied under the district licensing scheme for suitable mitigation for Great crested newts.

- 7.9 Surrey Police: have made the following comments:
- Crime reduction measures for PV panel thefts
 - Signage
 - Security fencing – stock fencing proposed
 - Risk of rural crime – panel theft
[Officer comment: the applicant would have a vested interest in providing security measures, it would be reasonable to require further details of fencing, and CCTV cameras etc.]
- 7.10 UK Power Networks: have made the following comments:
- In close proximity of a substation – if within 6.0m would need a party wall agreement
 - In close proximity of high voltage cables
- 7.11 Southern Gas Networks: have made the following comments:
- Insufficient details of the drilling system to better understand the potential this could have on each of the buried steel pipelines.
 - Crossing over and along Southern Gas' buried steel pipelines could endanger the assets as could changes to the landscape (eg. embankments) within the vicinity of the pipelines.
- 7.12 Cadent Gas Network: no response
- 7.13 Waverley Borough Council: no objection
- 7.14 Greener Futures Team, Surrey County Council: have made the following comments:
- The County's strategy commits the county of Surrey to be net zero carbon emissions by 2050 in alignment with Government targets
 - commercial organisations that set targets to be carbon neutral or ideally net zero carbon emissions by 2030 are displaying leadership
 - The Delivery Plan sets a target to increase the capacity of renewable electricity generation by 1244 MW by 2025
 - Scheme would lead to a 13% increase in the county's total renewable energy capacity based on the 2022 data
- 7.15 County Minerals and Waste Planning Authority: no objection subject to a condition, and have made the following comments:
- Non-prejudicial to safeguarded waste management site at Royal Surrey County Hospital
 - Suggest a condition securing the submission of a Construction Environmental Management Plan (CEMP)
 - Welcome re-use the estimated 1,700 cubic sqm of excavated material off-site with a licensed waste contractor
- 7.16 County Archaeologist: no objection subject to a condition, and have made the following comments:
- Limited below ground impact from mounting of PV panels
 - Potential to disturb remains from the access road and cabling works, where open cut excavation would not be used
 - Park pales survive as a buried archaeological feature and to have a trench for a more detailed record, where affected by the proposals

- Programme of archaeology works that combines further geophysics on areas yet to be surveyed with targeted trial trenching and archaeological monitoring where required to identify and record features
- 7.17 Forestry Commission England: no objection, concerns have been addressed in relation to the drilling methodology and buffer zone protection to the Ancient Woodland and arboricultural supervision.
- 7.18 Woodland Trust: no objection, concerns have been addressed in relation to the drilling methodology under the Ancient Woodland and root protection areas.
- 7.19 Network Rail: have made the following comments:
- due to the close proximity of the proposed development to Network Rail's land and the operational railway, require engagement with Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing [officer comment: repeated attempts have been made to seek a response on the impacts of glint and glare since June 2024 to date, with no response received]

Internal consultees

- 7.20 Tree Officer: no objection and made the following comments:
- satisfied that there would be no loss or deterioration of the ancient woodland or ancient/veteran trees
 - All woodland and the majority of tree cover would be retained
 - Where trees would be removed, they would not impact the wider local character of the area
 - The extensive new tree planting and landscape proposals would mitigate removal necessary to facilitate development.
 - Suggested conditions in relation to: the Arboricultural Impact Appraisal and Method Statement, arboricultural supervision and pre-commencement site meeting.
- 7.21 Environmental Health: have made the following comments:
- satisfied there is a low risk of contamination being discovered or disturbed
 - satisfied that the noise report has been undertaken in accordance with BS 4142: Method for rating and assessing industrial and commercial sound
 - no comments on the pre-construction waste management plan
 - consider the future noise impacts on the site allocation
 - no concerns about artificial lighting
 - potential, temporary impact on The Street, Compton Air Quality Management Area (AQMA) during commissioning/decommissioning
 - suggest conditions in relation to: operational noise, unexpected contamination and HGV routes
- 7.22 Property & Assets: no comment
- 7.23 Hankinson Duckett Associates (HDA), Landscape Architecture advising the Council: have made the following comments:
- Welcome woodland planting to the south of the Little Misley field and a condition to minimise reflectivity of the panels
 - HDA's and the applicant's interpretation of GLVIA3 are different - requirement to establish whether the effects arising are or are not significant.

- Summary table (page 96 of Planning, Design and Access (PD&A) Addendum) is useful in narrowing the potential landscape and visual effects
- judgements on landscape effects are under-estimated for fields with solar arrays
- agreement on the significance of effect at the worst-case scenario for some residents
- visual effects on the users of some PRowS and permissive paths is a key issue – has been assessed as a sequential experience not just from a single viewpoint
- Level of effects would be higher on the permissive path between Big and Little Misley Fields
- Area (E1) to the west of Wildfield Field – inadequate mitigation planting
- The significance of effects could be mitigated through the proposed planting over time
- Solar panels a detracting feature in the countryside
- Leaving the southern boundary hedge to Little Misley Field to grow to a greater height would appear out of character with the majority of retained hedges in the area
- Consideration of ongoing National Landscape boundary review
- Little Misley Field is part of a valued landscape given its intervisibility with that part of the SHNL along the Hog's Back and its inclusion in the AGLV
- The blocks of woodland would provide good screening of the two northern fields of solar panels
- Little Misley does not benefit from existing screening, particularly on its southern and western edges; with views from PRowS to the west (Footpath 452) and east (Bridleway 447), and from a permissive path between Little and Big Misley fields
- Proposals for areas of additional native woodland, such as south of Misley Copse and Wildfield Copse, are most welcome

Parish councils

7.24 Wanborough Parish Council: object and have raised the following matters:

- Harm to Green Belt
- Harm to wildlife and habitats
- Harm to AGLV
- Harm to the countryside
- Loss of agricultural land
- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites
- Change to previously developed land
- Harm to a National Landscape
- Harm to setting of a National Landscape
- Traffic congestion – Tesco roundabout
- Lack of development plan policies
[officer comment: policy D17 was adopted in March 2023 in the LPDMP]
- Loss of agricultural land
- Inefficient use of land - angle of panels, orientation, spacing, not connected to the National Grid
- No benefits to BNG
- Would not achieve net zero objective

7.25 Compton Parish Council: object and have raised the following matters:

- Lack of development plan policies
- Traffic congestion – Tesco roundabout

- Harm to Green Belt
- Loss of agricultural land
- Harm to ancient woodland
- Harm to wildlife and habitats
- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites, buy green energy from the National Grid
[Officer comment: see section on loss of Best and Most Versatile agricultural land and alternatives considered]
- Alternatives not assessed
- Harm to setting of a National Landscape
- Harm to heritage asset
- Cannot demonstrate very special circumstances
- Harm to visual amenity from PROWs
- Glint and glare from PV frames
- Accuracy of photomontages
- Premature of National Landscape review
- Harm to AGLV
- Inefficient use of land - angle of panels ineffective
- Embodied carbon
- Change to previously developed land
- Cannot demonstrate very special circumstances

7.26 Worplesdon Parish Council: object and have raised the following matters:

- Loss of agricultural land
- Premature of National Landscape review
- Harm to Green Belt
- Impact on accessibility of PROWs
- Harm to AGLV
- Harm to setting of a National Landscape
- Monitoring of BNG
- [officer comment: this would be secured as a planning obligation by a S106 legal agreement]
- Harm to wildlife and habitats
- Suggest condition in relation to colour finish, boundary treatments, BNG, screening, CEMP and CTMP
- Affect future designation as a National Landscape
- Harm to a non-designated heritage asset – Victorian well
- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites

Amenity groups

7.27 Save Hogs Back: object and have raised the following matters:

- Harm to the Green Belt
- Cannot demonstrate very special circumstances
- Inefficient use of land - angle of panels ineffective
- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites
- Loss of agricultural land
- Harm to setting of a National Landscape
- Harm to ancient woodland
- Harm to wildlife and habitats

- Premature of National Landscape review
- Alternatives not assessed
- Harm to visual amenity from PROWs
- Affect future designation as a National Landscape
- Screen planting to Little Misley field – increase overshadowing to PV panels
- Impact on underground utilities – high pressure gas main

7.28 Save Surrey Countryside: object and have raised the following matters:

- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites
- Harm to the Green Belt
- Harm to the countryside
- Harm to wildlife and habitats
- Impact on accessibility of PROWs
- Harm to setting of a National Landscape
- Harm to AGLV
- Premature of National Landscape review
- Would not achieve net zero objective
- Loss of agricultural land
- Cannot demonstrate very special circumstances
- Affect future designation as a National Landscape
- Impact on underground utilities – high pressure gas main

7.29 West Surrey Badger Group: object and have raised the following matters:

- Harm to badgers – inaccurate survey
- Harm to wildlife and habitats
- Loss of agricultural land

7.30 Surrey Campaign to Protect Rural England (CPRE Surrey): object and have raised the following matters:

- Harm to the Green Belt
- Cannot demonstrate very special circumstances
- Harm to AGLV
- Premature of National Landscape review
- Harm to setting of a National Landscape
- Loss of agricultural land
- Harm to wildlife and habitats
- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites, buy green energy from the National Grid
- Embodied carbon
- Alternatives not assessed – access road and cabling route
- Change to previously developed land
- Set a precedent
[officer comment: not a material planning consideration]
- Does not comply with development plan policies
- No Carbon Life Cycle Impact Assessment
[Officer comment: this is not a requirement for development. The built development included in the PV panels would have a direct embodied carbon, however, the following the Supreme Court decision under *Finch* indirect effects have to be included and in this case there would be the decarbonisation and reduction in greenhouse emissions]
- Temporary use unacceptable

- Affect future designation as a National Landscape
- Set a precedent
- No Viability Assessment
[Officer comment: the applicant does not need to provide this as part of their very special circumstances]
- Interpretation boards would not further the purposes of the SHNL
- Impact on underground utilities – high pressure gas main
- Conflicts with planning conditions and obligations made when the Surrey Sports Park was granted
[Officer comment: a S106 was completed under outline planning permission (02/P/02505) granted for the Manor Park campus on 17.05.2004, this had requirements which have been complied with and there would be no conflict, as set out at para. 2.4.318-326 of the Addendum to Planning Design and Access Statement]
- Loss of agricultural land
- Impact on accessibility of PROWs

7.31 Guildford Society: object and have raised the following matters:

- Premature of National Landscape review
- Lack of development plan policies
- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites, Corporate Power Purchase Agreements (CPPA), battery storage
- Land restoration
- Affect future designation as a National Landscape
- Change to previously developed land/ Grey Belt
- Cannot demonstrate very special circumstances

7.32 Guildford Residents Association: object and have raised the following matters:

- Harm to the countryside
- Harm to setting of a National Landscape
- Premature of National Landscape review
- Alternatives not assessed
- Harm to the Green Belt
- Set a precedent
- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites

7.33 The Farnham Society: object and have raised the following matters:

- Harm to setting of a National Landscape
- Premature of National Landscape review
- Alternatives not assessed

7.34 The British Horse Society: have made the following comments:

- PROW should not be used for site access
[officer comment: the new haul road would carry vehicular traffic]
- Temporary measures for continued PROW access during construction
[officer comment: this could be part of the construction transport management plan (CTMP)]
- Damage to the surface and conditions of the PROW
[officer comment: this could be part of the construction transport management plan (CTMP)]
- Risk of flooding

- Fear of crime – security of PV panels
- 5m corridor between fencing
- Suitable fencing design
- Opportunities for increasing access
- Noise and disturbance from inverter housing
- Definitive Map Modification Order (DMMO) application currently being investigated by the County to add a footpath/bridleway to the definitive map, known as “West Flexford Lane”

7.35 Access4Equestrians: object and have raised the following matters:

- Impact on accessibility of PROWs
- Definitive Map Modification Order (DMMO) application currently being investigated by the County to add a footpath/bridleway to the definitive map, known as “West Flexford Lane”
- Alternative proposal preferred – access road
- Suggested conditions – new surfacing of PROW, 3m wide segregation, signage, speed limits, crossing points, off road circular routes,

7.36 Historic Buildings & Places: no comment

7.37 Zero Carbon Guildford: in support and have raised the following matters:

- Response to climate change required
- Facilitates decarbonisation and net zero strategy
- Delivers Biodiversity Net Gains
- Mitigation planting
- Mitigates impacts on wildlife and habitats
- Allows for soil restoration
- Alongside solar panels on existing developed
- Continued community engagement on decarbonisation efforts

7.38 Institute for Sustainability, University of Surrey: in support and have raised the following matters:

- Economic benefits
- Energy security
- Facilitates decarbonisation and net zero strategy

7.39 University of Surrey Students' Union: in support and have raised the following matters:

- Response to climate change and carbon emissions for future generations
- A consideration for prospective students
- An integral part of a University’s long-term strategy across all operations
- Facilitates decarbonisation and net zero strategy

Third party comments:

7.40 A total of 112 responses to object have been received, have raised the following matters:

- Harm to the Green Belt
- Loss of agricultural land
- Harm to a National Landscape
- Harm to setting of a National Landscape
- Harm to wildlife and habitats

- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites, revised access for Beechcroft Drive
- Would not achieve net zero objective
- Premature of National Landscape review
- Alternatives not assessed – access road, cabling route, road surface
[officer comment: the reasons and justification have been provided including all the options assessed]
- Harm to non-designated heritage asset – former deer park, archaeology
- Harm to heritage assets – medieval moat
- Harm to AGLV
- Harm to ancient woodland
- Traffic congestion – Tesco roundabout, rat running
- Access to third party land
[officer comment: this would be a private civil matter and the grant of planning permission would not override any other legal requirements]
- Impact on accessibility of PROWs
- Embodied carbon
- Definitive Map Modification Order (DMMO) application currently being investigated by the County to add a footpath/bridleway to the definitive map, known as “West Flexford Lane”
- Harm to public open space
[officer comment: Strawberry Field is not designated as open space in the Local Plan]
- Conflicts with planning conditions and obligations made when the Surrey Sports Park was granted
- Inefficient use of land - angle of panels, orientation, spacing, specification
- Cannot demonstrate very special circumstances
- Harm to visual amenity from PROWs
- Would not connect to the National Grid
[officer comment: the cable route would allow for a connection to the substation at Stag Hill which would then allow a connection to the grid]
- No energy storage
- Need for Environmental Impact Assessment
[officer comment: the application has been screened]
- Impact on underground utilities – high pressure gas main
- Energy losses during transfer along cables
- Health fears - electromagnetic field leakage
- Set a precedent
- Public notification of application
- Use of a planning condition for land restoration
- Extension of solar farm by five further years
[officer comment: this would be a temporary use that could be managed by condition and any extension would require a planning application to be made]
- Use of a legal agreement for the planning obligations rather than condition
[officer comment: advice in the PPG Paragraph: 011 Reference ID: 21a-011-20140306 confirms that were imposing a condition or a planning obligation could be used to overcome a matter, a condition should be used]
- Change to previously developed land
- Conflict with site allocation A27
- Noise and disturbance during commissioning/ decommissioning
- Flooding risk
- Harm to air quality
- Limited BNG benefits

- Screen planting to Little Misley field and existing tree coverage – increase overshadowing to PV panels
- Affect future designation as a National Landscape
- Lack of public engagement

7.41 One response has been received in support and has raised the following matters:

- Take opportunities to decarbonise the electricity grid
- Would increase biodiversity compared to agricultural land
- Minimal infrastructure required
- Land rested so would be more productive when returned to agricultural use
- Suggested conditions - biodiversity and land restored to previous condition

7.42 Beechcroft Drive Resident Association: object and have raised the following matters:

- Alternatives not assessed – access road
[officer comment: the reasons and justification for the access road have been provided and at least four options were assessed]
- Harm to the Green Belt
- Alternative proposal preferred – mount PV panels on existing developed/ brownfield sites
- Risk of judicial review
[officer comment: publicity has taken place in accordance with the legal requirements]
- Harm to non-designated heritage asset – former deer park
- Harm to heritage assets – medieval moat
- Harm to AGLV
- Harm to wildlife and habitats
- Harm to setting of a National Landscape
- Premature of National Landscape review
- Noise and disturbance during commissioning/ decommissioning
- Harm to visual amenity from PROWs
- Impact on underground utilities – high pressure gas main
- Health fears - electromagnetic field leakage
- Inefficient use of land - angle of panels, orientation, spacing
- Would not achieve net zero objective
- Impact on Strawberry Field
[Officer comment: a S106 was completed under the outline planning permission (02/P/02505) granted for the Manor Park campus on 17.05.2004, access has been provided and the construction of the access track would maintain the existing access and not have an adverse impact on its nature conservation value, see para. 2.4.318-322 of the Addendum to PD&A Statement]
- Impact on underground utilities – high pressure gas main
- Cannot demonstrate very special circumstances
- No Carbon Life Cycle Impact Assessment

8.0 Planning policies:

8.1 National Planning Policy Framework (NPPF), December 2023:

2. Achieving sustainable development
4. Decision-making

- 6. Building a strong, competitive economy
- 8. Promoting healthy and safe communities
- 9. Promoting sustainable transport
- 11. Making effective use of land
- 12. Achieving well-designed and beautiful places
- 13. Protecting Green Belt land
- 14. Meeting the challenge of climate change, flooding and coastal change
- 15. Conserving and enhancing the natural environment
- 16. Conserving and enhancing the historic environment

8.2 Written ministerial statements (WMS)

'Building the homes we need' - Statement made on 30.07.2024

'Solar and protecting our Food Security and Best and Most Versatile (BMV) Land' - Statement made on 15.05.2024

8.3 Planning Policy Guidance (PPG)

8.4 National Policy Statement (NPS), January 2024

These provide planning guidance for nationally significant energy infrastructure projects on how applications for energy infrastructure will be assessed and the way in which impacts and mitigations will be judged.

NPS EN-1: Overarching National Policy Statement for energy

NPS EN-3: National Policy Statement for renewable energy infrastructure

8.5 Guildford Borough Local Plan: Strategy and Sites (LPSS), 2015-2034:

The LPSS was adopted by Council on 25.04.2019. This forms part of the statutory development plan and the policies are given full weight.

Policy S1: Presumption in favour of sustainable development

Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value

Policy P2: Green Belt

Policy P4: Flooding, flood risk and groundwater protection zones

Policy E5: Rural economy

Policy D1: Place shaping

Policy D2: Climate change, sustainable design, construction and energy

Policy D3: Historic environment

Policy ID3: Sustainable transport for new development

Policy ID4: Green and blue infrastructure

Policy A26: Blackwell Farm, Hogs Back, Guildford

Policy A27: Land for access road between A31 Farnham Road and Blackwell Farm, Hogs Back, Guildford

Following the adoption of the LPDMP in 2023, parts of Policy D2 of the LPSS were updated.

8.6 Guildford Borough Council: Development Management Policies (LPDMP) March 2023:

The LPDMP was adopted by the Council on 22.03.2023. This forms part of the statutory development plan and the policies are given full weight.

Policy P6: Protecting Important Habitats and Species
Policy P7: Biodiversity in New Developments
Policy P8: Land Affected by Contamination
Policy P9: Air Quality and Air Quality Management Areas
Policy P10: Water Quality, Waterbodies and Riparian Corridors
Policy P11: Sustainable Surface Water Management
Policy D5: Protection of Amenity and Provision of Amenity Space
Policy D11: Noise Impacts
Policy D12: Light Impacts and Dark
Policy D14: Sustainable and Low Impact Development
Policy D15: Climate Change Adaptation
Policy D17: Renewable and Low Carbon Energy Generation and Storage
Policy D18: Designated Heritage Assets
Policy D19: Listed Buildings
Policy D20: Conservation Areas
Policy D21: Scheduled Monuments
Policy D23: Non-designated Heritage Assets
Policy ID10: Parking Standards

8.7 Surrey Waste Local Plan (SWLP) 2019-2033

Policy 4: Sustainable Construction and Waste Management in New Development

8.8 Guildford Borough Council Local Plan 2003 'Saved Policies'

Policies saved by the Direction on 24.09.2007 were replaced by Guildford Borough Local Plan: Development Management Policies (2023) which sits alongside the Local Plan Strategy and Sites (2019) document, see Appendix D of the LPDMP. None of these residual policies are relevant to this application and carry very limited weight.

Policy U1: University of Surrey, related to land inset from the Green Belt. 'The Manor Park; University of Surrey Development Brief, SPD' (2003) was adopted to support this policy. Policy U1 was not saved by the Direction on 24.09.2007 and as the SPD was underpinned by a policy that is not saved, neither of these carry any weight in decision making]

8.9 Supplementary planning documents:

Climate Change, Sustainable Design, Construction and Energy (2024)
Green Belt (2023)
Strategic Development Framework (2020)
Onslow Village Conservation Area Appraisal (2003)

8.10 Evidence base

Topic paper: Climate Change and Sustainable Development (2022)
Topic paper: Green Belt and Countryside (2017)
GBCS Volume II addendum – further consideration of land surrounding the urban areas of Guildford, Ash and Tongham (2014)
Green Belt and Countryside Study (GBCS) – six volumes (2013)

8.11 Other strategies

Surrey Hills AONB Management Plan 2020-2025

Referred to in policy P1(4) of the LPSS, to meet the statutory obligations under the Countryside and Rights of Way Act (2000), however, this is not solely a planning document nor has it been prepared as an SPD.

Section 245(3) of the Levelling-up and Regeneration Act 2023 (“LURA 2023”) relates to National Parks, areas of outstanding natural beauty/ national landscapes (“AONBs”) and the Norfolk and Suffolk Broads, this came into effect on 26.12.2023. It amends Section 5(1) of the National Parks and Access to the Countryside Act 1949. Given the wide scope of National Landscapes, this document is given greater weight in decision making.

8.12 Other guidance

House of Commons Library, Research Briefing: Planning for solar farms (May 2024)

Surrey Climate Change Adaptation and Resilience Strategy (Surrey Adapt) (2023)

Surrey’s Greener futures climate change delivery plan 2021-2025 (2022)

Surrey Climate Change Strategy (2020)

Hog’s Back Natural Beauty Evaluation for Land to the east of Flexford in the vicinity of Blackwell Farm, Down Place and Homestead Farm produced by Land Management Services Ltd on behalf of Compton and Worplesdon Parish Councils (May 2016)

Surrey Landscape Character Assessment (2015)

Guildford Landscape Character Assessment (2007)

Guidelines for Landscape and Visual Impact Assessment (GLVIA3)

Landscape Institute technical guidance note 02/21 ‘Assessing landscape value outside national designations’

8.13 Relevant case law

R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents) [2024] UKSC 20 – indirect greenhouse gas emissions

Monkhill Ltd v Secretary of State for Housing, Communities and Local Government & Anor (Rev 1) [2021] EWCA Civ 74 – Area of Outstanding Natural Beauty

R (Samuel Smith Old Brewery (Tadcaster) & Ors) v North Yorkshire County Council [2020] – Green Belt

Palmer v Herefordshire Council [2016] EWCA Civ 1061, para 5 – setting of listed buildings

Jones v Mordue and another [2015] EWCA Civ 1243 – setting of listed buildings

Redhill Aerodrome Ltd v SSCLG [2014] EWCA Civ 1386 – Green Belt

Barnwell Manor Wind Energy Ltd v East Northamptonshire DC [2014] EWCA Civ 137 - setting of listed buildings

Wokingham Borough Council v Oxford Diocesan Board of Finance [2013] EWCA Civ 1718 – WMS as a material consideration

Fordent Holdings v SSCLG [2013] EWHC 2844 (Admin), paragraph 19 - Green Belt

Cala Homes (South). Ltd v Secretary of State [2011] EWCA Civ 639 – WMS as a material consideration

9.0 Environmental impact assessment:

- 9.1 The development falls under Schedule 2, Category 3(a) (Industrial installations for the production of electricity, steam and hot water) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended, as the proposal falls within as it exceeds the threshold in column 2, given the area of the development exceeds 0.5 hectare. So exceeds the thresholds in column 2 of Schedule 2.
- 9.2 However it is not in a sensitive area. It is concluded, having regard to the selection criteria within Schedule 3, the proposal is not EIA development.
- 9.3 A sensitive area does include a designated National Landscape, however, it does not include a candidate area for the SHNL and this can be assessed through the landscape and visual information submitted with this application; as this designation is gaining weight in decision-making.
- 9.4 The previous application under 22/P/02178 and the screening opinion issued under 22/S/00003. Where for a different development in terms of the access track and cable route and was also deemed to not amount to EIA development.

10.0 Consultation direction to the Secretary of State:

- 10.1 The Town and Country Planning (Consultation) (England) Direction 2024 (“Direction”) is made under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No 595).
- 10.2 It requires local planning authorities in England to consult the Secretary of State before granting planning permission for certain types of development, Part 4b) is relevant:

4. For the purposes of this Direction, “Green Belt development” means development which consists of or includes inappropriate development on land allocated as Green Belt in the development plan and which consists of or includes-

 - (a) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or*
 - (b) any other development which, by reason of its scale or nature or location, would have a significant impact on the openness of the Green Belt.*
- 10.3 The impact on the openness of the Green Belt and the effect on the landscape shall be assessed below, whether this site is considered on its own or in conjunction with any nearby permitted scheme. The benefits that would arise would have to be balanced against the harm to the Green Belt and the impact on the landscape.
- 10.4 Whether there would be a “significant impact” shall be assessed below, and a judgement shall be made on if the threshold for Part 4b) has been reached.

11.0 Planning considerations:

The main planning considerations in this case are:

- The principle of development

- Impact on the Green Belt
- The effects of the proposal on the character, appearance and special qualities of the Surrey Hills NL and AGLV
- Loss of Best and Most Versatile agricultural land
- Impact on the significance of Heritage Assets
- Access, highway safety and capacity
- Impact on protected species and biodiversity
- Impact on trees and vegetation
- Flooding, flood risk and groundwater protection
- Neighbour amenity part done
- Alternatives considered
- Other matters
- Planning Benefits and Very Special Circumstances
- Heritage balance
- Overall planning balance

11.1 The Principle of Development

National strategy

- 11.1.1 In November 2008, the UK passed the Climate Change Act with an overwhelming majority across political parties. The 2008 Climate Act is a legally binding commitment by the UK to reducing its greenhouse gas emissions by 80% by 2050 compared to 1990 levels, formed the Committee on Climate Change, and established UK carbon budgets. In June 2019, this was strengthened by The Climate Change Act 2008 (2050 Target Amendment) Order 2019 committing the UK to bring all greenhouse gas emissions to net zero by 2050 i.e. reduce by 100%. This is referred to as the UK net zero target. The UK was the first country to set legally binding carbon budgets, which place restrictions on the total amount of greenhouse gases the UK can emit over five-year periods. To date, six carbon budgets have been set, up to 2037.
- 11.1.2 In November 2022, ahead of COP27 (the United Nations Climate Change Conference or Conference of the Parties of the UNFCCC, more commonly referred to as COP27), the UK joined the Net Zero Government Initiative as a partner and signatory. This Initiative is led by the United States and participants agreed to develop and publish a roadmap laying out how they would bring their government emissions to net zero by 2050.
- 11.1.3 The 'Net Zero Strategy: Build Back Greener' strategy published in October 2021 and updated in April 2022. Sets out policies and proposals for decarbonising all sectors of the UK economy to meet our net zero target by 2050. The '10 point plan for a green industrial revolution' lays the foundations for a green economic recovery from the impact of COVID-19. This included a commitment to fully decarbonise the power system by 2035. In March 2023 the then new Department for Energy Security and Net Zero (DESNZ), published 'Powering Up Britain – The Net Zero Growth Plan', this confirmed that in 2021 the share of generation from renewables reached 40%, including from bioenergy, wind and solar.
- 11.1.4 As of March 2024, the cumulative installed capacity of solar power in the UK was 15.8 gigawatts (GW). The government aims to achieve 70 GW of solar power by 2035, this is equivalent to approximately 172.83 million solar panels

or enough energy for 70 billion LED bulbs. To meet its sixth carbon budget (a 78% reduction in emissions compared to 1990 levels by 2035, published in December 2020), the government's advisory Climate Change Committee estimated that solar power would need to provide 60 terawatt hours (TWh) of energy by 2035. It also estimated that an additional 3 gigawatt (GW) of solar power would need to be installed per year to reach that level. This requires a fivefold increase in the provision of solar power by 2035.

- 11.1.5 'Powering Up Britain: Energy Security Plan' last updated in April 2023 by DESNZ sets out how the government will enhance our country's energy security, seize the economic opportunities of the transition, and deliver on our net zero commitments. This includes large-scale deployment of ground-mounted solar on brownfield, industrial, and low- and medium-grade agricultural land (page 23).
- 11.1.6 In May 2022, the south east region had 14.6% of the operational solar farms and those under/awaiting construction. However, none of these are located in the county of Surrey. In terms of public attitudes to solar farms, in England, 89% of those surveyed by DESNZ in spring 2023 expressed general support for the use of solar power in the UK. However, only around half 53% of those surveyed said they would support/ be happy about a solar farm in their local area. In Guildford, Zero Carbon Guildford confirm that public support for solar power stands at 92.4%, with 87.4% support for renewables projects in the local area. Therefore, a lack of acceptability by the local community affects the delivery of solar projects.
- 11.1.7 Following the general election on 04.07.2024 the new government have set out a direction of travel on renewable energy production in the UK, which is committed to achieving net zero electricity by 2030. The Climate Change Committee (CCC) published its progress report to Parliament on 18.07.2024, this concluded that the UK is off track in achieving net zero and only a third of the emissions reductions required to achieve the UK's 2030 target, are currently covered by credible plans. The government have announced the solar taskforce has been reconvened alongside a land use framework working in tandem with their spatial energy plan. The Written Ministerial Statement (WMS) of 30.07.2024 was published the same day as the updates to the NPPF and both boost the weight that planning policy gives to the benefits associated with renewable energy generation.
- 11.1.8 The assessment of 'downstream' greenhouse gas emissions is a material consideration as established in the Supreme Court decision under *R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents) [2024] UKSC 20*. In relation to renewable energy projects, it would be reasonable to consider the indirect greenhouse emissions that would be reduced and/ or eliminated as a result of delivering renewable energy projects including solar farms.

Local strategy

- 11.1.9 The Surrey Climate Change Strategy identified the need to develop actions to increase Surrey's resilience to Climate Change. 'Surrey Climate Change Adaptation and Resilience Strategy (Surrey Adapt)', was a strategy developed in partnership, and helps the County and its partners to manage climate impacts and risks in a more efficient and coordinated manner. The Strategy commits the county of Surrey to have net zero carbon emissions by 2050 in

alignment with Government targets. Including a target for 15% of energy to be from solar by 2032.

- 11.1.10 The Strategy states “The county has great potential for expanding this generation capacity, with the Southeast region able to generate 36% more electricity from PV [photovoltaic] schemes than other areas of the UK.” Surrey’s Greener Future Group confirms that the county is both well-placed to make a significant contribution through solar energy and to-date has not been able to deliver this.
- 11.1.11 The ‘Greener futures climate change delivery plan 2021 to 2025’, shows how public sector, businesses, residents and communities can work together to bring about faster change. The Delivery Plan sets out the emissions reduction pathway the county must follow in order to achieve this. This sets the target to reduce annual carbon emissions in the county between 1.2 and 2.4 Million Tonnes of carbon dioxide equivalent (MtCO₂e) by 2025, compared to the 2018 baseline of 6.6 MtCO₂e.
- 11.1.12 The applicant estimates the proposed development would avoid 1,122,000 kg CO₂e of emissions per year, equivalent to less than 1% of the target emissions reductions. However in the context of the University of Surrey’s organisational emissions, then it is more significant, as the applicant states the project “will offset approximately 36% of the University’s typical annual [electricity] consumption”. The Delivery Plan, also includes the aim that by 2025 “Businesses show leadership by tackling their own emissions and offering innovative low carbon goods and services for Surrey”. The county considers organisations that set targets to be carbon neutral or ideally net zero carbon emissions by 2030 are displaying leadership, and therefore have an important role to play in encouraging Surrey’s residents and businesses to also decarbonise.
- 11.1.13 The Delivery Plan recognises that Surrey needs to contribute to the decarbonisation and management of the electricity grid through increasing the generation of renewable energy in the County. So it sets a target to increase the capacity of renewable electricity generation by 1,244 MW by 2025, however National Statistics data for 2022 shows Surrey had only 93.9 MW of renewable energy capacity (less than 7.4% of that required). Surrey County Council’s ‘Greener Futures Climate Change Progress Report 2022-2023’ concluded that there is “a significant shortfall in what needs to be done across Surrey to meet the pace and scale of the challenge”. This echoes the most recent findings by central government.
- 11.1.14 The Council declared a Climate Emergency in 23.07.2019. The emergency notes that all governments (national, regional and local) have a duty to act (to combat climate change) and that the Council has a crucial role to play in both leading by example and influencing the way that the residents and businesses of Guildford Borough live and work.
- 11.1.15 The Corporate Plan 2024-2034 is committed to achieving a net-zero carbon for the wider borough by 2050, collaborating closely with partners and communities to tackle it together and to deliver more ambitious carbon reductions. It has been reported that only around 30% of Guildford’s emissions can be directly tackled by the borough or county councils. The remaining 60-70% must be addressed through strategies aimed at reducing consumption, better energy management, and waste reduction. Recognising

that everyone has a responsibility to act on climate change and we need to do all we can at a local level to become more environmentally sustainable and to reduce the borough's carbon footprint. This is aligned with central government strategy.

- 11.1.16 The University of Surrey has a 'Net-Zero Strategy' (2030), this is two-fold with measures to reduce demand and to decarbonise the energy supply. The University has a consumption of approximately 28 GWh/yr, and this is expected to increase in the future due to the need for data centres (to support their people-centred AI) and electric vehicle (EV) charging. The University has a strategy that involves using roof mounted solar panels and decarbonising energy consumption.
- 11.1.17 The applicant's 'Greenhouse Gas Emission Assessment' (GHGA) confirms the generating capacity of the solar farm would be approx. 8.25 GWh per year, which would offset approximately 36% of the University's typical annual consumption. At least 66% of the electricity generated from the solar farm would be consumed by the University. There would also be 34% (4.2GWh) zero carbon export to grid (also referred to as "spillage"), which is local generation benefitting the regional/national grid decarbonisation targets. However, the University are working to reduce the amount of energy exported. The Energy Centre would be part of this.
- 11.1.18 Achieving net zero shall necessarily require a significant reduction in the use of fossil fuels (with residual emissions subject to offsetting, at least in the short to medium term) which will consequently require a significant increase in the use of electricity in place of hydrocarbon energy.
- 11.1.19 An increase in local renewable energy would assist in either reducing or offsetting borough carbon emissions, depending on whether renewable schemes meet local energy demand or feed clean energy into the national grid. The former would reduce the borough's emissions directly while the latter could be considered primarily an offsetting measure by displacing electricity generated from fossil fuels.

National policy

- 11.1.20 Solar farms with a generating capacity below 50 megawatts (MW) need planning permission from the Local Planning Authority (LPA). Those over this capacity are 'nationally significant infrastructure projects' (NSIPs) and require development consent from the Secretary of State.
- 11.1.21 When deciding planning applications, the NPPF advises LPAs to give planning permission to renewable energy projects whose impacts are (or can be made) acceptable. It states at para. 163 that LPAs should "not require applicants to demonstrate the overall need for renewable and low carbon energy."
- 11.1.22 The Planning Policy Guidance (PPG), on renewable and low-carbon energy last updated in August 2023 sets out what LPAs should consider when assessing planning applications for solar farms and drawing up their local plans:
- the impact of solar panels on local amenity and local landscapes, including cumulative impacts of large-scale solar farms;

- the impact of solar farms on protected areas, such as National Parks and National Landscapes (formerly Areas of Outstanding Natural Beauty);
 - that the need for renewable energy does not automatically override environmental protections;
 - the siting, size, colour and design of solar systems; and
 - the visual impact of solar farms, in particular their impact on the local landscape in terms of “glint and glare” and on neighbouring uses.
- 11.1.23 The guidance states that, although large-scale solar farms can have “a negative impact” on rural landscapes, their visual impact can usually be “properly addressed within the landscape”, for example, “with effective screening and appropriate land topography”.
- 11.1.24 The PPG (Paragraph: 013 Reference ID: 5-013-20150327) advises LPAs that, for the “effective use of land”, large-scale solar farms should be located on previously developed (brownfield) land and non-agricultural land which is not of “high environmental value”. The NPPF at para 180, guides development, including renewable energy developments such as solar farms, away from the ‘best and most versatile’ (BMV) agricultural land. This shall be assessed below.
- 11.1.25 The NPPF at para. 156 makes clear that renewable energy projects, including solar farms, are not “appropriate” development for Green Belt land except in “very special circumstances.”
- 11.1.26 The consultation on changes to the NPPF publish on 02.08.2024 specifically says the government will support clean energy and the environment, including through support for onshore wind and renewables. Changes would be to give significant weight to the benefits associated with renewable and low carbon energy generation.
- 11.1.27 Whilst this application is not an NSIP, the National Policy Statements (NPSs) provide a useful guide for the approach and considerations on renewable energy infrastructure. There is a policy presumption for low carbon infrastructure, such as solar farms known as “critical national priority” status under the NPS for energy EN-1, last updated in January 2024. Also the “important role” of solar power in “delivering the government’s goals for greater energy independence” in NPS EN-3, last updated in January 2024.
- 11.1.28 The NPS EN-1 requires applicants to avoid, reduce, mitigate or compensate any adverse impacts of their projects (for example, on the environment) “so far as possible”. The NPS EN-1 acknowledges that there may be “residual adverse impacts” despite the implementation of such measures, which the Secretary of State should consider. However, it states that residual impacts are “unlikely to outweigh” the urgent need for low-carbon infrastructure. Except in “exceptional circumstances”, the Secretary of State should not refuse consent to low-carbon infrastructure because of residual impacts.
- 11.1.29 Furthermore, the NPS EN-1 also states that the Secretary of State should assume that low-carbon infrastructure meets tests that require “clear outweighing of harm, exceptionality, or very special circumstances”. They should assume, for example, that the urgent need for low-carbon infrastructure meets the “very special circumstances” test for development on Green Belt land as well as the “exceptional circumstances” test for

development in protected areas, such as National Parks and National Landscapes. These matters are equally applicable to this application.

Local policy

- 11.1.30 LPSS policy S1 reflects the NPPF's presumption in favour of sustainable development while D2(1) confirms that proposals for zero carbon development are strongly supported.
- 11.1.31 LPDMP policy D17 does not allocate sites for renewable energy schemes and the rationale for this is explained in para. 3.37-3.42 of the 'Topic Paper: Climate Change'. As part of the consultation responses on the draft LPDMP; a blanket prohibition on renewable energy development was requested in the Green Belt and/or National Landscape. However, this would not accord with the NPPF and national strategy and guidance.
- 11.1.32 Policy D17(1) is supportive of renewable and low carbon energy. Policies D17(2), (3) and (4) then set out relevant considerations for: Green Belt, 'very special circumstances', visual impacts, biodiversity and temporary permissions. These are elaborated upon in para. 5.249 – 5.257 of the supporting text. These matters shall be assessed below.
- 11.1.33 The proposed development would install 12.21 megawatts (MW) of solar PV, this would amount to approximately a 13% increase in the County's total renewable energy capacity based on the 2022 data. Furthermore, this would generate enough energy for 110,988 Nissan Leaf electric cars. Within the current context of the pace and scale of renewable energy installation in Surrey, this project would be a significant increase in capacity. With the University taking a proactive approach to achieving its own net zero strategy, as well as making an important contribution to wider benefits to the borough and county.

11.2 Impact on the Green Belt

- 11.2.1 The application site comprises development on the Green Belt and adjoins the urban area of Guildford town. This comprises undulating agricultural fields with copses of woodland and trees and hedgerows along field boundaries, to the west and south of the University campus. The site allocation for Blackwell Park and a new access road to serve this, have been inset from the Green Belt by site allocation policies A26 and A27.
- 11.2.2 Para. 154 and 155 of the NPPF sets out what constitutes appropriate development in the Green Belt. This is consistent with policy P2 of the LPSS.
- 11.2.3 Where development would not comply with these exemptions there would be definitional harm, as set out under para. 152 of the NPPF. Para 153 of the NPPF explains that development has to be justified by very special circumstances to clearly outweigh this harm by reason of inappropriateness.
- 11.2.4 It is also necessary to consider the impacts on the openness of the Green Belt. The spatial concepts associated with assessing the impacts on openness were confirmed through *R (Samuel Smith Old Brewery (Tadcaster) & Ors) v North Yorkshire County Council [2020]*. Whilst any visual impact on openness is still important, spatial factors and the presence or otherwise of built or urban development are relevant considerations.

- 11.2.5 In spatial terms, some 32.88ha of the total site area of approximate 45.86ha would be developed for the solar farm, for up to 35 years.

Whether inappropriate development in the Green Belt

- 11.2.6 The proposed development comprises the solar array and the housing for equipment associated, then the engineering works comprising the access track and cabling route. These shall each be assessed below.

Solar arrays, fencing and equipment enclosures

- 11.2.7 All three fields are in the Green Belt, therefore, these parts of the proposed scheme would amount to 'inappropriate development' when applying national and local planning policy terminology linked to protecting the Green Belt. As they would not meet any of the exemptions.

- 11.2.8 In terms of openness, this would introduce operational development, however, the panels would be low-lying, set on posts, and restricted to about 3.0m in maximum height. Grassland would otherwise remain on the surface of the ground with four equipment enclosures and inverters, with small footprints.

- 11.2.9 The fencing would be 2.4m in height and have post and wire mesh design and would encircle each of the fields.

- 11.2.10 It is acknowledged that the spatial openness would change the visual openness, however, the fields of Wildfields and Big Misley have largely contained characteristics. There is a noticeable degree of enclosure created by existing hedgerows and treeline screening the site from the wider PROWs that they do not share a boundary with. The fields and would not be seen from the Hog's Back (A31). Furthermore, Wildfields the northern field adjoins the boundary with the site allocation for residential development and the other fields of Big Misley and Little Misley are close to the Green Belt boundary and separated by areas of woodland. This location would serve as a transitional, buffer zone when the new homes are delivered and even prior to their delivery would have a degree of enclosure. This is confirmed in the submitted Landscape and Visual Assessment (LVA) which shows that potential visibility of the proposal would be very limited and localised.

- 11.2.11 Due to the topography, the change from undeveloped land to a solar array would have a greater impact on the field at Little Misley, which has less containment and defensible landscaping when seen from the rising land to the south and the west. This shall be considered in the wider planning balance. This LVA has carried out a detailed assessment of proposed impacts from viewpoints and this shall be assessed below.

- 11.2.12 The applicant proposes an extensive package of landscape mitigation, comprising of native hedgerow and tree planting, which would further screen and filter views of the developments, for horse riders and walkers using the Public Right of Way (PRoW) networks. Once that mitigation has reached full maturity, only sparse and occasional glimpsed views of the panels, fences and ancillary structures would remain.

- 11.2.13 The impact on openness arising from new tree and hedge plantings would not erode or be harmful to Green Belt openness or permanence, either during operation of the scheme or following any decommissioning work if left in place. This would become legacy planting that would enhance the character and biodiversity of the area.
- 11.2.14 The design parameters of the proposed solar arrays, fencing and ancillary structures would enable the retention of open agricultural land beneath or surrounding them. Although there would be a clear reduction in spatial and visual openness of the Green Belt from the presence of the solar arrays and associated equipment, the loss of openness would otherwise be tempered by undeveloped fields to the west and south, which would remain.

Access track and cabling route

- 11.2.15 The spurs of the access track to and between each field, and the cable route and track before it enters the Manor Farm complex would be in the Green Belt.
- 11.2.16 These works would amount to engineering operations which may not be inappropriate provided they would preserve Green Belt's openness and would not conflict with the purposes of including land within it under exemption b) of para. 155 of the NPPF.
- 11.2.17 Most of the land within the Green Belt where development is proposed, is undeveloped. This also includes a section that would transect Strawberry Fields also known as Strawberry Meadows to the north of Beechcroft Drive, which has been made available as informal open space by the University. Only one section would be on previously developed land as it is an existing surfaced road, which would be widened.
- 11.2.18 The introduction of the access track, as an engineered structure associated with the solar farm would be a significant spatial change which would markedly reduce Green Belt openness levels on the application site, compared to the current situation. However, the design would comprise, predominantly of a single track with no engineered aprons, kerbs or track lighting. This would be comparable to a track used for agricultural or forestry, which are common features in the countryside and benefit from permitted development under part 6 of the Town and Country Planning (General Permitted Development) (England) Order 2015.
- 11.2.19 As there would be a greater change in terms of the spatial and visual amenity from the currently undeveloped land to a partially engineered track, this would not preserve the openness of the Green Belt, even for the temporary period of 35 years. So therefore, this would amount to inappropriate development in the Green Belt.
- 11.2.20 The cable route would be underground and whilst this would involve development when being laid, due to the engineering works for excavation. Any visual changes would be limited to the commission and decommissioning stages of the development. Furthermore, where ducting is laid, other utilities required for the residential site allocation would be laid at the same time, to reduce disruption.

- 11.2.21 Therefore, the impact on the openness of the Green Belt from the cable route would for limited periods and would not have a material harmful impact on spatial or visual amenity. This would preserve the openness of the Green Belt.

The purposes of the Green Belt

- 11.2.22 NPPF para. 143 sets out the five purposes of the Green Belt:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 11.2.23 As part of the evidence base for the LPSS, the Green Belt and Countryside Study (GBCS) Volume II and Volume II addendum assessed how land within the Green Belt contributed to the five Green Belt purposes. Sections of the proposed access track are in parcels H1 and H2 that covers land to the west and south of the University campus, parts of these parcels were later inset under site allocation policies A26 and A27 in the LPSS.
- 11.2.24 This assessment in Volume II addendum concluded that parcel H1 made a positive contribution to purposes 1, 3 and 4 and did not meet purpose 2, so had 'high' Green Belt sensitivity. The parcel scores against purpose 4 because it 'Preserves setting for Guildford historic town, the Hog's Back Chalk Ridges – GURFCA (B1, Guildford urban-rural fringe landscape character area), and preserves the setting of a scheduled monument at the medieval moated site at Manor Farm', this shall be assessed below. Parcel H2 made a positive contribution to purposes 1 and 3 and did not meet purposes 2 and 4, so had 'medium' Green Belt sensitivity. The study assumed that all land parcels would contribute towards purpose 5.
- 11.2.25 Furthermore, both sites are contained by existing development and vegetation. It was recognised in the GBCS that parcel H1 was closer to existing highway infrastructure compared to parcel H2. A small section of the access track goes through the parcel H1, which was not inset, so would remain in the Green Belt. As such, it does not follow that the development would cause moderate to high harm to the Green Belt. Nor would the development weaken the integrity and function of the Green Belt or its boundaries as it would remain within the Green Belt. The purposes shall be assessed in further detail below.
- 11.2.26 Only the eastern boundary of Wildfields would adjoin the future built urban edge that would be created by the site allocation of Blackwell Park, the remaining parts of the application site are separated from it by open land and woodland copses. As a result, the proposed development would have a degree of visual discretion from the urban area. Moreover, the solar panels and associated infrastructure would be relatively low-lying features, that would have a completely different character and form to the urban development on the edge of the University land. As such, the proposal would not be seen as the spreading out of the settlement and would not be contrary to this purpose.
- 11.2.27 Bringing the spatial and visual aspects of the resultant openness reduction together, when having regard to purpose para. 143 a) functionally and characteristically, it is accepted that the solar farm would be different to other

forms of development which would be usually characterised as 'urban' or 'industrial'. Until Blackwell Park is built out to the east and south east, the fields with the solar arrays would not share characteristics with the nearby built-up areas of the Guildford urban area, the solar arrays would be read and experienced in the local landscape as being entirely distinct from the urbanised and built-up qualities of Guildford, also acknowledging it has substantial landscaping greenery as part of its overall composition. However, the proximity and activity along the Hog's Back (A31), whilst in the Green Belt is an urban feature in close proximity which detracts from the rural character of the area.

- 11.2.28 The access track, due to its design and appearance would have a lower degree of engineering, so would be distinct from urban and semi-rural development and therefore, the existing 'built-up' areas. The track would not pass through the Scheduled Monument and the separation would ensure that this would preserve the setting and special character of historic towns.
- 11.2.29 The Green Belt in this area has a role to play in preventing the coalescence of Guildford with Ash and Tongham to the west and Godalming to the south. A significant gap would remain between these built-up areas and as highlighted above the proposal would have a completely different character and form to the urban areas. Additionally, the LVA shows there would be limited visibility of the proposal from longer range views. So visually, the impact the proposal would have on the perceived openness of these gaps, would be very limited. Consequently, the proposed scheme would not be contrary to this purpose.
- 11.2.30 The proposed development would introduce manmade structures and engineering operations into the fields and so would change their character. Nonetheless, the solar arrays would be located within the existing field pattern and the scheme would retain and enhance the existing field boundaries. This would result in minimal visibility of the scheme from outside the site. Furthermore, the solar arrays would be low-lying, open sided features and the access track would share the features of tracks in the countryside. Given that these would be temporary in nature, this would limit the overall effect on the countryside and heritage features.
- 11.2.31 Regard also has to be had to the reversibility of the proposed development and any potential conditions required as part of the decommissioning stage, which would ensure that any aspect of openness intrusion would be reversible. Given the ease of reversibility, particularly for the solar arrays reversibility. This plays an important role, and that the groundworks involved for the access track are not unduly intrusive and would be similar to those required for agricultural/forestry purposes. Also where possible the access track would be used as part of the housing site allocation.
- 11.2.32 The Planning, Design and Access (PD&A) Statement and follow up PD&A Addendum sets out the site selection process that was undertaken to identify fields that would be able to utilise the connection capacity that is available to the substation at University's Stag Hill site and to avoid higher grade agricultural land quality. This concluded that there were no sites of the size needed to ensure a financially viable scheme that were brownfield land or that were not located in the Green Belt. In the absence of any evidence to contrary, there is no reason to dispute this conclusion. In the light of this, the proposal would have limited impact on the fifth Green Belt purpose.

Green Belt openness and purpose effects

- 11.2.33 With regard to the above, although the solar arrays and associated development are no doubt engineered built features, this in itself would not result in urban sprawl of an existing built-up area. The existing distinctions in character would remain reinforced by the retained and enhanced natural landscaping.
- 11.2.34 Consideration has been given to other purposes; however, it is not concluded the scheme could be described as urban sprawl. . Nonetheless, there would be inevitable conflict with para. 143 purpose c). That is because of the degree of encroachment into the countryside with operational development and engineered structures covering an extensive land area which would be currently undeveloped and has open, naturalistic qualities.
- 11.2.35 Although maintaining some space would be provided between the rows of solar panels. The solar arrays, access road and associated infrastructure would fundamentally alter the appearance of the fields. From a sequence of open green spaces to the proposed development and would be interspersed with retained field boundaries. Such an effect would result in encroachment, in contradiction of a Green Belt purpose under para. 143 c) of the NPPF. This would give rise to definitional harm by virtue of inappropriate development by default. However, the degree of harm it would cause would be limited. Due to the nature of the proposals and the reversibility.
- 11.2.36 The scale of effect, in terms of area for the solar array is broken up by the intervening presence of Wildfield Copse and boundary hedgerows to the fields at Wildfields and Big Misley. The effect on spatial openness would be greater on the field of Little Misley, as seen from the PROWs and permissive paths to the south and west. However, these works are reversible, and the frames and fencing are freestanding structures which would not require the degree of site restoration associated with mineral extraction and waste operation when the proposed use ceases.
- 11.2.37 The access road would be constructed to a specification that would be commonly seen for agricultural, forestry and recreational uses which are not uncommon in the Green Belt. However, the route and crossing points and proximity with PROWs would increase the scale of effects especially when seen from the rising land to the south.
- 11.2.38 The proposal would cause moderate visual harm, although given the very localised nature of this visual impact, this would only have a lesser impact on the visual openness of the Green Belt.
- 11.2.39 The PPG (Paragraph: 001 Reference ID: 64-001-20190722) indicates that when assessing the impact of a development on the openness of the Green Belt, the duration of the development and its remediability, and the degree of activity it would be likely to generate, are matters to take into consideration. The proposal would occupy the site for 35 years and this could be secured by condition. Although a significant period of time, the proposal would not be permanent. At the end of this period the site could be restored to agricultural land. In addition, apart from during the construction phase and during decommissioning, the operation stage of the development would generate minimal activity.

- 11.2.40 Overall, the resultant effect of the development would give rise to a moderate level of overall harm to the Green Belt accounting for: visual impact, openness impacts; the specific purposes the development would conflict with; and relative to the scheme's magnitude. Aligned with the content of para. 153 of the NPPF, substantial weight is afforded to the demonstrable harm arising, by virtue of the above there is definitional harm.
- 11.2.41 Accordingly, there would be conflict with policy P2 of the LPSS, which seeks to protect and conserve the openness and purposes of the Green Belt. Apart from definitional harm arising linked to policy, there would be a marked reduction in openness through encroachment into undeveloped countryside. The resultant effect would conflict with para. 143 c) of the NPPF, and there would be no conflict with parts a), b) d) or e).
- 11.3 The effects of the proposal on the character, appearance and special qualities of the Surrey Hills National Landscape (SHNL) and Area of Great Landscape Value (AGLV) and prematurity of the National Landscape Review
- 11.3.1 Natural England (NE) has taken another step forward in their review of the Surrey Hills National Landscape (SHNL). They consulted on some additional land that they consider met the requirements for designation last year. In July 2024, NE published a report which sets out their responses to the comments made to that consultation. They have also proposed some additional amendments to the proposed boundary – deleting some areas identified last year and adding some new areas (more has been added than deleted – the total additions now sum to an extra 29%). NE will consult on these proposed amendments. The current timetable envisages submitting the Order to the Secretary of State early/mid 2026. At this time, whilst the application is not in the SHNL it is in the candidate area and therefore this designation has growing weight in decision making. So it would not be unreasonable to give relative weight to the relevant development plan policies and NPPF considerations.
- 11.3.2 For the avoidance of doubt, para. 183 of the NPPF, requires consideration of whether there are the exceptional circumstances to justify proposed development that constitutes major development under footnote 64 of the NPPF; where it can be demonstrated that the development is in the public interest. Given that full weight is not afforded to a SHNL candidate area. This requirement is not engaged, in this case.
- 11.3.3 Para. 135 c) of the NPPF seeks to ensure that developments are “sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).”
- 11.3.4 Para. 180 is concerned with enhancing the natural and local environment, part a) protecting and enhancing valued landscapes; and b) recognising the intrinsic character and beauty of the countryside are relevant.
- 11.3.5 Policy D1(4) of the LPPS required a response and reinforcement of landscape setting and para. 4.5.9 explains that “The relationship of the built environment to the landscape must be taken into account and the transition from urban to rural character will need to be reflected in the design of new development with the green approaches to settlements respected.”

- 11.3.6 Policy D4(3) of the LPDMP requires development to be of a high-quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place including its landscape qualities.
- 11.3.7 The evidence base for the LPSS and LPDMP included the Guildford Landscape Character Assessment (GLCA), this is a technical report and is part of an integrated assessment of the character of Guildford including its rural, rural-urban fringe and townscape areas. This provides a tool for understanding the landscape environment of these areas, how they came to be, how they may change and considerations for decisions.

Context

- 11.3.8 The land beyond the built-up area is within the E1: Rydeshill-Fairlands (rural-urban fringe) landscape character area is identified in the GLCA, Volume 2. This covers the rural urban fringe west of Guildford extending from the Royal Surrey Hospital site and Rydeshill on the urban edge, encompassing the small commons that characterise the landscape to the west of Guildford and the satellite suburb of Fairlands. The southern boundary is the A31 and the northern boundary of the character area is formed by the Aldershot Road marking the transition with the sandy heaths and common around Worplesdon.
- 11.3.9 Within the southern part of the area, the large woodland blocks of Strawberry Grove, Dean Bottom and Manor Grove have key role in screening and containing large-scale development associated with the Surrey Research Park from the wider countryside. The area acts as a low-key local gateway to the suburban edges of Guildford, primarily via minor roads and rural lanes (although these frequently carry heavy traffic). The area also includes the A323 and on the northern boundary, the A322 as well as the railway line.
- 11.3.10 This is a summary of the relevant landscape guidelines in the GLCA, E1: Rydeshill-Fairlands:
- Seek to improve understanding of the former Royal Deer Park as a historic landscape and conserve remnant landscape features;
 - Continue and ensure appropriate long term conservation management of the woodland blocks to the south of the area;
 - Ensure good recreation management (through a visitor management plan) to conserve the informal, rural character of the commons and seek to avoid cluttering the landscape with urban style park furniture;
 - Manage, retain and where appropriate seek to reinstate the hedgerow network;
 - Promote the use of appropriate native plant species and boundary treatments;
 - Conserve key views towards Stag Hill and Guildford Cathedral;
 - Conserve the open rural gaps between Guildford and outlying suburbs such as Fairlands and Wood Street Village;
 - Conserve the essentially rural character of the roads and lanes that cross the area;
 - Rural boundaries fronting the roads should be maintained avoiding the creation of hard boundaries/fencing, car parking or wide kerbed entrance splays;
 - Sensitive lighting and avoiding excessive signage;
 - Creation of small woodland, hedge boundaries to provide local screening;

- Ensuring good management of adjacent land to provide an intact rural context.
- 11.3.11 B1: Hog's Back Chalk Ridge (rural) landscape character area is identified in the GLCA, Volume 1. This forms part of the North Downs and is in the SHNL. It is a narrow east west running ridge in the west of the borough, with the A31 running along its crest. There are panoramic views of the countryside and urban areas of Guildford. The application site forms the setting to this.

Landscape and Visual Assessment (LVA)

- 11.3.12 The applicant has submitted a Landscape and Visual Assessment (LVA) which considers a study area of 2.5km from the development position (see drawing 273201/003 LVA Figure 1), zone of theoretical visibility (see drawing 703201/L001 LVA Figure 7) and visualisations from viewpoints representative of receptors within this study area. The study area, encompassed by the viewpoints, is appropriate to assess the likely important effects of the proposed development on landscape character and views. The Assessment Methodology in the LVA has been undertaken broadly in line with best practice guidance as set out in the Guidelines for Landscape and Visual Impact Assessment (Third Edition) 2013 (GLVIA3). However, HDA who reviewed the LVA on behalf of the LPA believe that there is a difference in interpretation. Nevertheless there is enough information to come to an informed assessment.
- 11.3.13 The submitted LVA includes consideration of both the sensitivity of the landscape character (nature of receptor) and the nature of effect (magnitude of change).
- 11.3.14 HDA provided a 'Summary of Landscape Effects' dated 07.06.2024, for the predicted landscape and visual effects arising from the proposed development. The applicant then made comments on this in Appendix A of the PD&A Statement Addendum. This is a summary:
- Agreement on the effects;
 - During the construction period and for several years afterwards, when intervisibility between the solar arrays and the surrounding landscape would be at its greatest;
 - The potential landscape and visual effects that are more likely to be a decision-making issue to the following receptor groups:
 - Effects on the landscape character of Area E1 of the GLCA;
 - Effects on private residents' views, particularly from Bushy Farm (adjacent to Footpath 452), Wildfields Farm (adjacent to Footpath 479), Chalkpit Cottages, Wellington House and Down Place;
 - People using recreational route Group iii) Footpath 479 (Viewpoint 6); and
 - People using recreational route Group iv) Footpath 452 (Viewpoint 4).
- 11.3.15 HDA have recommended:
- mitigation measures for the Little Misley Field should be secured through the imposition of a suitably worded condition to ensure they are sufficient to substantively reduce the potential adverse landscape and visual effects and respond positively to national and local policy;
 - request samples of the materials to be used on the solar panels (dark blue/black in colour and coated in a non-reflective covering

Impacts on landscape qualities

- 11.3.16 It is possible to see that the proposal would be situated within a mixed and managed landscape. Whilst there is a predominance of what most people would recognise as 'countryside' visible within the views recognised in its designation as an AGLV. This is a rural-urban fringe location with built settlement to the west comprising the Guildford town and the University (as identified by the GLCA), as well as being visible in wider views with vantage points including the ridge of the Hog's Back, which is the current boundary of the SHNL.
- 11.3.17 HDA have stated that the lack of roads near to the site, with access being limited to tracks, combined with the amount of woodland, results in a sense of remoteness from urban influences, in addition to this the site's intervening position between urban areas to the north and west and the SHNL to the south, means that this landscape is enjoyed by many people for its scenic and rural qualities. However, to some extent, the proposed solar arrays would be largely absorbed into the landscape, which is significantly dominated by the existing Manor Farm University complex and the future site allocation at Blackwell Farm.
- 11.3.18 The site of the of the spoil removal for a section of the access track, is in the urban area, the immediate topography would be changed. Given the proximity to Manor Farm farm buildings, the works would not appear obtrusive in shorter range views (including from the Scheduled Monument) and would not be seen from wider range views.
- 11.3.19 Viewpoint 1 is taken from a view north from the A31 Hog's Back (see Appendix I of the PD&A Statement Addendum). This is an amended photomontage view including the increased 10m depth of woodland planting along the southern boundary of Little Misley field. This demonstrate that the proposed solar array on the most location would be screened. The depth of woodland planting would provide a more effective mitigation as a robust screening measure, achieving full screening earlier than the 15 years currently anticipated. This would reduce the level of visibility from the A31 Hogs Back and any residual harm relating to the setting of the National Landscape is further reduced. HDA agree that this is an improvement and the planting could be secured by condition.
- 11.3.20 Therefore, the views from within the existing SHNL would not be significantly impacted by the proposal. As such views would not only be mitigated through the use of sensitive landscaping within the site over its lifetime, furthermore, the proposed development would be viewed within the wider landscape. Most viewers would see the proposal as a tiny part of a kinetic experience when travelling through the SHNL by vehicle on the A31, Hog's Back rather than as a visually dominating feature within the landscape. This is due to the verdant edges and the topography sloping downhill away from the A31, which would limit views for road users of the solar array on Little Misley.
- 11.3.21 It is accepted that there would be physical changes to the site, although this represents a tiny fraction of the candidate area of the SHNL, AGLV and of the landscape character area in which it lies (E1: Rydeshill-Fairlands) where the solar array and access track would be sited. The physical character of the site would be altered, however, open fields to the south and west would remain

and to the east is the site allocation which in time would have an urbanising effect. The vast majority of the impact on the character, appearance and special qualities of the candidate area for the SHNL would be visual.

- 11.3.22 The effects of the proposal on the three fields would be transformative, however, these are three fields within a large candidate area for the SHNL, AGLV and E1 landscape character area, so the overall effect of that immediate impact (as opposed to longer distance views from across the valley) would not be as significant, when taken relative to the size of the designations. The close vicinity of the site to the urban area, topography and surrounding hedgerows means that two of the solar array fields and sections of the access track would not be seen until a passerby is right upon them. It is acknowledged that there would be an aesthetic change in the appearance of fields from the solar array, once completed. However, there is no convincing basis to conclude it would prevent the enjoyment of the countryside for recreation or using the public routes within it.
- 11.3.23 The proposed hedgerow and woodland planting would, after a period of time, obscure the solar arrays from short range views at close quarters. HDA have suggested the need for additional screen planting at the western end of the Wildfields field. This boundary would comprise a retained hedgerow, a new hedgerow and retained/ enhanced grassland margin. Whilst it may not be possible to completely obscure them, there would be planting to mitigate the impacts and a landscaping condition would be suitable to secure the details of the planting. Notwithstanding this, these elements of the proposed development would have only a limited and localised visual effect.
- 11.3.24 In visual terms, whilst the two northernmost fields of solar arrays would benefit from the wooded nature of the area, the solar array on the field known as Little Misley would be visible from a number of locations. The field is perceptible in views from the rising ground to the south, including the A31 Hog's Back and from sections of PROWs including Footpath 480 and Bridleway 447 east of the field and footpath 452 that runs on East Flexford Lane west of the field. It is proposed to have additional screen planting to mitigate these visual effects. While from locations closer to the site such as the PROWs and the A26 site allocation, the containment of the fields and nature of the access track would reduce the impacts on visual amenity. From longer-distant views the effect would result in an indistinguishable darker appearance which would be acceptable compared to the other fields that would remain undeveloped.
- 11.3.25 In closer views from public rights of way to the east and west, Little Misley is less prominent due to the lower topography and intervening vegetation. From the north, the field surface is visible through gaps in the boundary vegetation from the track immediately to the north between Little and Big Misley fields. The track is not currently a PROW, instead this is a permissive path provided by the University of Surrey. To mitigate the short-range views of the solar array there would be hedgerow planting.
- 11.3.26 The fencing would be 2.5m in height, the proposed post and wire mesh design would not be visually dominant and would over line blind in with the enhanced planting. When seen from the PROWs and permissive paths adjoining the field boundaries.
- 11.3.27 The construction period would result in some temporary heavy traffic, these visual effects would be for a temporary period. The access track has been

designed to have low engineering and would predominantly follow the field boundaries. This would not be perceptible from viewpoint 1 (Western viewpoint from A31 AONB) and viewpoint 5 (Eastern viewpoint from A31 AONB).

- 11.3.28 From the fields themselves, the extent and 3.0m height of the solar array, would not unduly obstruct outward views and so would not cause harm to the candidate area of the SHNL. However, as there would be some harm to views from the existing SHNL, the AGLV and landscape character area this would be contrary to policy P1(3) and (5) of the LPSS, which states that development should be conserved and enhanced to maximise its special landscape qualities and scenic beauty and must have regard to protecting its setting. Then partially conflict with P1(1) due to the impact on the SHNL candidate area.
- 11.3.29 The proposal would comprise of shiny panels akin to glazing in appearance that could give rise to glint and glare. This could have a negative effect on aircraft, trains, vehicles, air traffic controllers, animals and homes. The applicant has indicated that each panel would be provided with an anti-reflective coating to mitigate the risk of glint and glare; this could be secured by condition. Solar arrays are commonly provided in areas of open countryside throughout the country and no technical evidence has been provided by any interested parties to suggest that unacceptable glint and glare from the solar array would cause demonstrable visual harm.

Furthering the purpose of protected landscapes

- 11.3.30 Section 245 of the Levelling Up and Regeneration Act (LURA) 2023 (in respect to Protected Landscapes) has amended section 85 of the Countryside and Rights of Way Act (2000) to place a new duty on local planning authorities when determining planning applications to *'seek to further the purpose of conserving and enhancing the natural beauty of the area'* when discharging their functions in Areas of Outstanding Natural Beauty (now known as National Landscapes).
- 11.3.31 Both the NE and AONB Advisor have asked for the LPA to be satisfied that the applicant has complied with this greater duty.
- 11.3.32 As stated above the application site is a candidate area for the SHNL, so currently forms the setting for the SHNL.
- 11.3.33 The applicant has explained at para 2.4.154-206, alternative options including doing nothing, alternative locations, scheme specific contributions to the Surrey Hills AONB Management Plan.
- 11.3.34 In addition to this, the applicant in recognition of the candidate area status of the application site, to further the statutory purposes of the existing/future National Landscape. Interpretive information (information boards, signposts, sculptural or other features to be agreed) would be provided in suitable locations along publicly accessible locations and routes (statutory public rights of way, permissive paths or areas with public access) within the application site and/or land within the applicant's control. This would give the local community and visitors to the area, with information to broaden their understanding and overall enjoyment of the SHNL.

- 11.3.35 The purpose of the SHNL designation is to conserve the natural beauty of the landscape, and specifically the character of the landscape and the public's enjoyment and understanding of it. The interpretive material could include details of the history of the landscape and its former and existing uses, including the Hogs Back, the former Royal deer park and the natural and heritage features that exist within it. They could also illustrate the beneficial linkages between renewable energy and the SHNL.
- 11.3.36 The applicant has submitted drawing 273201-TOR-015 of the Potential Measures. The details for this and could be secure by condition.
- 11.3.37 The applicant has taken a proactive approach, given that the requirements of Section 245 of LURA carry some but not full weight in decision-making. This would be a suitable response and would further the purpose of conserving and enhancing the natural beauty of the area.
- 11.3.38 There would effectively be no loss of dark skies as a result of the development proposed and no external lighting is proposed. This would accord with policy D12 of the LPDMP.
- 11.3.39 There would be some harm to the character of the area from the creation of the low engineered, access track. Whilst such tracks are not uncommon features in the countryside, the extent of the route would result in a degree of visual intrusion compared to the current situation. This would be contrary to policy D1(4) of the LPSS and D4(3) of the LPDMP.
- 11.3.40 There would be limited harm from longer distance views towards Little Misley where, the field is more prominent, however, the additional screen planting would reduce the visibility of the solar array. Therefore, this would comply with the guidelines for the landscape character area. Although, as there would be harm to the view from the existing SHNL boundary and as you move along the PROWS from south to north and looking east. This would be contrary to policy P1(3) and (5) and partial conflict with P1(1) of the LPSS.

11.4 Loss of Best and Most Versatile agricultural land

- 11.4.1 Paragraph 180(b), of the Framework, states that planning decisions should contribute to and enhance the natural and local environment by (inter alia) 'recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland'. The Framework's Glossary defines Best and Most versatile (BMV) agricultural land as being land in grades 1, 2 and 3a of the Agricultural Land Classification.
- 11.4.2 The NPPF also notes that LPAs should seek to:
- protect and enhance landscapes, biodiversity, geology and soils
 - recognise soils as a natural capital asset that provide important ecosystem services
 - consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land
 - prevent soil, air, water, or noise pollution, or land instability from new and existing development

- 11.4.3 The PPG notes that decisions ‘should avoid unnecessary loss of BMV land’.
- 11.4.4 Policy E5(3) (rural economy) of the LPSS states that ‘agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account’.
- 11.4.5 In addition, the overarching National Policy Statement (NPS) for Energy (EN-1), is used by the Secretary of State on applications for energy developments that are nationally significant under the Planning Act 2008. However, paragraph 1.2.1 notes that in England the NPS, in combination with any relevant technology specific NPSs, may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended).
- 11.4.6 The National Policy Statement EN-3 (paragraphs 2.10.28 to 2.10.34) provides guidance regarding solar farm developments in respect to agricultural land classification and BMV. Paragraph 2.10.29 recognises that land type should not be a predominating factor in determining the suitability of the site location, and that where the use of agricultural land has been shown to be necessary, poorer quality land should be preferred. Paragraph 3.10.15 also confirms that ground mounted solar arrays (such as this proposal) are not prohibited on agricultural land classified as grade 1, 2 and 3a BMV land or sites designated for their beauty.
- 11.4.7 Since the submission of the planning application it is noted that on 15.05.2024 the previous Government released a Written Ministerial Statement made by Clare Coutinho, who at that point was Secretary of State (SoS) for Energy Security and Net Zero. The implications of the WMS shall be discussed later in this section of the report.

Application site selection

- 11.4.8 The applicant notes that the solar facility has specific operational requirements. Site size and configuration are noted as being important factors, and the site area of circa 22 hectares of usable land will have sufficient space for solar panels with a proposed generating capacity of about 12.2 MW.
- 11.4.9 An Alternative Sites Assessment has been submitted with the application which explains why the proposed site has been chosen as the location for the solar installation. As the proposal is intended to provide a renewable energy source for the University, only land within its estate has been assessed. In the circumstances, this is considered to be a reasonable starting position.
- 11.4.10 The applicant notes that the key considerations for site selection are:
- is there sufficient land to accommodate the proposal;
 - is it subject to national or international nature conservation or landscape constraints which may make other land without these constraints preferable; and
 - is the land already occupied or proposed for other uses which would make the installation of the development, at the scale required, difficult or incompatible with existing uses.

- 11.4.11 Of the sites within the University's estate which were considered, only site 8 (land west of the Local Plan Blackwell Farm strategic allocation) had some potential as an alternative to the application site as a location for the development. The other sites considered were discounted for the following reasons:
- 11.4.12 **Site 1 – Stag Hill Campus:** Although there are areas of open space on the campus, either on their own or combined, they are not of a size large enough to accommodate the proposal. The possibility of providing solar energy from the site by retrofit of solar panels to the roofs of the existing buildings has also been considered. The applicant has provided the assessment:
- the suitability of the existing building stock (structural stability, wind loading, orientation);
 - the presence of other rooftop plant that restricts the space available, likely reduction of car parking spaces (in the case of the main car park); and
 - the loss of parking capacity during construction makes the Stag Hill campus unsuitable for an installation of the size required
 - if the main car park could be 'roofed over' with panels, this would only be an area of 2.6ha, well short of the required 21.6ha needed.
- 11.4.13 However, it is noted that the University has still pursued using rooftop mounted solar panels, as a complementary part of its zero-carbon strategy, in addition to the solar facility, as can be seen in the planning history. The more recent buildings at the site already have solar panels on their roofs, and the University is intending to install further panels on any additional new buildings subject to design considerations. Retrofitting is also being planned for existing buildings where feasible and will happen when the opportunity arises. This would be for additional capacity to the 12.2 MW that the solar facility will provide.
- 11.4.14 **Site 2 – Manor Park:** The site is about 56.9 ha in size. However, much of it is occupied by buildings and high-quality playing pitches of the Surrey Sports Park. The applicant also notes that the site has land reserved for future development of academic, residential and support services and associated infrastructure. These would not be available for the solar facility. There are no other large areas of open space of a size, either alone or in combination, to provide a 21.6ha solar facility. Even in combination the small pockets of open space which exist on the site would fall far short of an unconstrained 21.6ha area. As regards the use of existing buildings and car parks, the same constraints noted with Site 1 apply here.
- 11.4.15 **Site 3 – Surrey Research Park:** The site is about 28.4 ha in size. However, it is almost fully occupied by buildings and associated grounds and infrastructure, with only two plots as yet undeveloped. These plots will be used for new buildings. As regards the existing buildings, some of these are on long leases and the University does not have control that would allow for the installation of solar panels to the extent needed. There are no large areas of open space of a size, either alone or in combination, to provide a 21.6ha solar facility. The open spaces on the site are of amenity value as a resource for site tenants, staff and visitors to the site to enjoy as part of the landscape setting for the Park. There are also constraints such as water bodies and mature trees that would mean only a fraction could be theoretically suitable for the installation of solar panels. It is therefore not possible to identify a

21.6ha site or combination of sites that could be used for a solar facility. As regards the use of existing buildings and car parks, the same constraints noted with Site 1 apply here.

- 11.4.16 **Site 4 - Manor Copse, Dean Bottom and Strawberry Grove woodlands:** The site is ancient woodland and its clearance for a solar farm would not be appropriate.
- 11.4.17 **Site 5 – Wildfield Copse:** Some of the site is identified as ancient woodland, the rest is woodland. As above, it would not be appropriate to clear this site for a solar array.
- 11.4.18 **Site 6 – Local Plan allocation (A26/A27):** The site is one of the Council's strategic housing allocations and there would not be sufficient space to accommodate a solar array of the size required, as well as the uses and housing required by the allocation.
- 11.4.19 **Site 7 – Land east of Down Place:** Part of the land is within the boundary of the Surrey Hills National Landscape (SHNL) (formally AONB). While this designation does not necessarily rule out solar farm development, if other sites (or parts of) that are not in the National Landscape are available, these would be preferred. The western part of the site is in agricultural (arable) use. The eastern field is an area of public access land and use for a solar facility on that field would not be compatible with the open access currently provided.
- 11.4.20 **Site 9 – Hazel Farm:** The site is too small (1.9ha) and is already occupied by student residences.
- 11.4.21 The applicant acknowledges that Site 8 (Land west of the A26 / A27 Local Plan allocation), excluding the National Landscape, woodlands and the cottages would be potentially suitable for ground mounted solar panels. It is noted that both site 8 and the application site are located in the Green Belt, so neither site has a benefit in this regard. Also, both consist of agricultural land with a mix of higher and lower grades. This means that there is no alternative suitable site that is entirely on lower grade land.
- 11.4.22 The application site and site 8 were then subject to a more detailed assessment field by field against a series of seven criteria to assess their ability to accommodate the project. The criteria were:
1. field size;
 2. presence of trees or other constraints within the field;
 3. presence of an existing public right of way;
 4. agricultural land quality;
 5. existing natural screening by trees, hedges and woodland;
 6. visibility from high ground in the AONB; and
 7. location within Area of Great Landscape Value (AGLV).
- 11.4.23 Based on an assessment of the above criteria, the application site scored better than site 8, which leads the applicant to suggest that it is more suitable for the proposed development.
- 11.4.24 It has therefore been demonstrated, with the support of soil survey evidence, and the alternative site assessment that the majority of the application area is

not considered to be BMV land and that the use of some limited BMV land (grade 2 and 3a) is necessary because it is not possible to locate the solar facility on lower grade land within the University's estate.

Loss of BMV

11.4.25 Notwithstanding the above justification that the application site is the best site within the University's ownership for the proposed development, it is fully acknowledged that the scheme would result in the loss of some BMV. This will be set out below.

11.4.26 It is noted that the proposed site comprises three separate arable fields, as set out in the proposal section.

11.4.27 A Soils and Agricultural Quality assessment has been submitted with the planning application. This notes that land of grades 2, 3 and 4 have been identified at the site. The total application site area of 21.6 hectares comprises the following:

Grade / Subgrade	Area (Ha)	% of application site
Grade 2	1.5	7
Subgrade 3a	7	32
Subgrade 3b	13.1	61
Total	21.6	100

11.4.28 Based on the results of this survey, 39% of the application site is considered to be BMV and this would not be available for arable farming for up to 35 years for the development.

11.4.29 As the proposal would prevent the arable farming of the application site, the resulting loss of BMV would be contrary to the NPPF and policy E5(3) of the LPSS.

11.4.30 However, there are a number of matters which need to be taken into account when calibrating the level of harm resulting from this policy conflict.

- It is noted that the loss of the BMV land for arable farming would be temporary. When the solar farm comes to the end of its working life (after 35 years), it would be removed from the site (which would be secured by condition) and the land would be restored to its previous condition and would be available for use again. The soil would also be allowed to rest for the 35-year period and this may lead to improvements in its quality as an agricultural resource in the future.
- The applicant notes that when the proposal is in operation the site could still be used for grazing of sheep, thanks to the looser spacing of panel rows within the scheme. However, if this did occur, it is acknowledged that this would not fully replace or offset the sites current capability for productive agricultural use.
- As already noted above, there is no land within the ownership of the University which would be (a) suitable for the development and (b) not result in some loss of BMV. Therefore, the loss of some BMV is necessary as it is not possible to locate the solar facility on lower grade land.

- 11.4.31 The harm arising from the non-compliance with policy E5(3) and the NPPF and the level of weight to be attributed to it shall be discussed in the final balance.

Written Ministerial Statement

- 11.4.32 As noted above, the previous Government published a Written Ministerial Statement (WMS) on 15.05.2024 entitled 'Solar and Protecting our Food Security and Best and Most Versatile (BMV) Land'. The WMS is a material planning consideration in the assessment of this application. Which is confirmed in the judgement made under *Wokingham Borough Council v Oxford Diocesan Board of Finance [2013] EWCA Civ 1718* and *Cala Homes (South). Ltd v Secretary of State [2011] EWCA Civ 639*.
- 11.4.33 The WMS states that 'Government recognises that, in some instances, solar projects can affect local environments which may lead to unacceptable impacts for some local communities. The planning system is designed to balance these considerations against the need to deliver a secure, clean, green energy system for the future'.

It goes on to note that 'as is outlined in the National Policy Statement, the starting position for solar PV developers in taking forward Nationally Significant Infrastructure Projects is that applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality. The National Policy Statement can also be a material consideration in determining applications under the Town and Country Planning Act 1990 and is broadly consistent with the approach to agricultural land in the National Planning Policy Framework which states that "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development". This means that due weight needs to be given to the proposed use of Best and Most Versatile land when considering whether planning consent should be granted for solar developments. For all applicants the highest quality agricultural land is least appropriate for solar development and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary. Applicants for Nationally Significant Infrastructure Projects should avoid the use of Best and Most Versatile agricultural land where possible'.

- 11.4.34 The WMS does not fundamentally change existing planning policy for solar arrays, which is already set out in the NPPF and NPSs. It emphasises that a balanced approach must be taken between the loss of BMV (to ensure food security for the country) and providing a sustainable and clean energy source for the country to tackle the global climate emergency. It has already been shown that the applicant has justified why the use of some BMV land is needed in this instance and its loss through the proposal will need to be factored into the balance.
- 11.4.35 The WMS also discusses the cumulative impact of solar arrays and notes that *'it is important to consider not just the impacts of individual proposals, but also whether there are cumulative impacts where several proposals come forward*

in the same locality'. However, it is noted that this would be the first solar array in this area of the borough and as such, there would not be any adverse cumulative impacts resulting from the approval of this application.

11.5 Impact on the significance of Heritage Assets

- 11.5.1 Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."
- 11.5.2 The effect of section 66(1) is a strong presumption against the grant of planning permission where a development fails to preserve the setting or features of a listed building. The judgement in *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC & Others [2014] EWCA Civ 137* confirms that "preserving" means "doing no harm" and that decision makers should give "considerable importance and weight" to the desirability of preserving the setting of listed buildings. *Jones v Mordue, Secretary of State for Communities and Local Government and South Northamptonshire Council. Date: 3 December 2015. Ref: [2015] EWCA Civ 1243* also confirms the application of this statutory requirement.
- 11.5.3 Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 11.5.4 Para. 205 of the NPPF applies to designated heritage assets. It provides that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 11.5.5 It is one of the core principles of the NPPF that heritage assets should be conserved in a manner appropriate to their significance. Chapter 16 of the NPPF in particular the requirements at para. 195, 201, 203, 205, 206, 208 and 209 are relevant.
- 11.5.6 Policy D3 of the LPSS reflects policy set out in the NPPF and requires that heritage assets be conserved in a manner appropriate to their significance. It also seeks to promote the highest quality of design in the historic environment which will help sustain and where possible enhance the special character and significance of heritage assets. Policies D18, D19, D21 and D23 in the LPDMP goes on to provide much greater detail of the heritage considerations that need to be applied. These are consistent with the NPPF.
- 11.5.7 The following designated heritage assets would be affected:
- Grade II - Wildfields farmhouse - lies within 50m of the north-east corner of Wildfield Field

- Scheduled Monument - former Guildford Park Manor (one of the principal lodges of the medieval deer park, which survives as a partially water-filled moat and related earthworks) - to the east of Manor Farmhouse, within 32m of the proposed access track

11.5.8 The site is in proximity of these conservation areas:

- Wood Street Village Conservation Area - lies within 0.55km of the northern boundary of Wildfield Field
- Onslow Village Conservation Area - lies within 290m of the proposed cable route on the south side of the Surrey Sports Park

11.5.9 The following non-designated heritage assets would be affected:

- Area of High Archaeological Potential (AHAP)
- Surviving park pales of the former deer park
- Victorian well - lies within approximately 26m south east of the proposed access track east PROW footpath 480

11.5.10 The application is supported by a desk-based heritage assessment and Heritage Statement (DBA&HS). This has been reviewed by the Council's Senior Conservation Officer.

11.5.11 The Heritage Statement (para. 5.22-5.23) identifies a number of other designated heritage assets, given their distance and lack of tangible or intangible association with the application site the proposals would not have a material impact on their significance.

Significance of the designated heritage assets and the impact on that significance

11.5.12 Annex 2 of the NPPF has the definition for the "Setting of a heritage asset", this is the same in the definition used in policy D18 of the LPDMP. The changes to the surrounding area are described in some detail in the heritage statement from has changed from the prehistoric, Roman, Medieval period to what is present on the site today. Whilst the uses of the land the subject of the application and the surrounding land has evolved the land continues to be an area on the edge of the built-up settlements of Guildford urban area and the surrounding suburban development.

Wildfields farmhouse

11.5.13 The Heritage Statement describes in more detail the significance of the Wildfields Farmhouse. The fields associated with the farmhouse have not been identified, there is no evidence to suggest that the Wildfields field has a functional or historic link to the farmhouse. The land was disparted in the mid C17th and most of the land divided into farms and this farmhouse dates from the C18th when it first appearing on a map in 1871. It is agreed that the heritage value of the listed building lies principally in the architectural and historic value of the fabric, appearance, and its presence within the wider landscape. The other landscape feature that contributes to the significance of the asset is the field to the immediate south of Wildfields that retains the historic boundaries of the agricultural landholding. The remote and secluded location in the landscape also, adds to the significance of its setting.

- 11.5.14 The Senior Conservation Officer is satisfied that the proposed development would not affect the fabric of the listed building or its physical layout. There would be glimpsed and filtered views from the farmhouse building, 45m to the west, its enclosed garden and surrounding spaces of the solar array on the Wildfields field. The existing barn and juxtaposition of the farmhouse with its main orientation looking northwards, would further reduce the number of views looking from east to west and south west. Furthermore, from Wildfields field the farmhouse is not visible due to the intervening planting and the location of the barn adjacent to PROW footpath 479. However, the presence of the solar array, 2.4m deer proof (wire mesh) fencing and CCTV cameras would have an urbanising effect in close proximity of the farmhouse, which would change how the farmhouse is seen and experienced in its secluded setting.
- 11.5.15 The proposed access track would cross the field to the south, broadly following the field boundary. Due to the orientation of the farm house and greater intervisibility and whilst there is no evidence of a functional association between this field and the farmhouse (given they are in different ownership and the field is part of the Blackwell Park site allocation), there is an indirect, visual relationship between the field and farm complex. The access track, whilst of a lower engineering standard, would have same effect on its setting as described above in terms of its isolated qualities. The applicant has proposed additional screen planting to mitigate the views.
- 11.5.16 Therefore, less than substantial harm has been identified at the **lower end** of the spectrum. Such harm would reduce over time as a result of the establishment of landscape mitigation reinforcing existing boundary planting and the urbanising effect that the development on the field to the south would have from the site allocation on Blackwell Park.
- 11.5.17 The proposals would result in the loss of significance to the setting of Wildfields Farmhouse and consequently this would amount to less than substantial harm, by virtue of the harm to the inward and outward views which contributes to its setting by the access track to the south and to a lesser degree from the solar array and associated infrastructure to the west and south west. This would be contrary to policies D3(2) of the LPSS, D18(1) and (3) and D19(2)(d) of the LPDMP, para. 205 of the NPPF and a presumption against the grant of planning permission in accordance with S66(1) of the Planning (Listed Building and Conservation Areas) Act 1990. This is given significant weight and needs to be weighed against the public benefits in the heritage balancing exercise required under para. 208 and the overall planning balance.

Medieval moated site, Former Guildford Park Manor

- 11.5.18 Manor Farm was once one of the principal lodges of the medieval royal deer park of Guildford. The site was constructed in the late 12th century and historically lay within the south-western corner of a sprawling 1620-acre deer park that had been established by Henry II soon after his accession in 1154.
- 11.5.19 Today's monument features a rectangular stone-lined moat, measuring approximately 30 metres x 45 metres which originally encircled the island on which the lodge buildings stood. The moat has been partially infilled on its west and south sides.

- 11.5.20 The park was accurately mapped in 1607 by John Norden and shows the 1620 acres divided between pasture woodland, retained for the deer, and an area for cultivation, titled 'The Downe' along the southern section of the park. To the south and west of the moated site are surviving components of its supporting landscape.
- 11.5.21 The moated site the heritage value linked to its historic and architectural interest linked to the royal deer park, moated building and landscape features.
- 11.5.22 Sections of the access track and underground cabling routes would be in proximity of the setting of the scheduled medieval moated site at Manor Farm; and at its closest point would be approximately 35m away. The land surrounding the moat and lodge would be unaffected by the proposals including the undeveloped land.
- 11.5.23 The Senior Conservation Officer is satisfied that given that the low engineering of the road, that the cable route would be underground and the distance from the complex. The proposed development would preserve the setting of the former Guildford Park Manor, schedule monument, this would preserve the designated heritage asset and no harm has been identified to its setting.

Conservation areas

- 11.5.24 The proposed development would not be within either of the two nearest Conservations Areas. The cable route would be underground so after the construction works this would have no impact on the significance of Onslow Village Conservation Area. The solar arrange on the Wildfields field is separated from the Wood Street Village Conservation Area by Backside Common and its woodland, the railway line and fields at Hook Farm and Woodland Farm. Given the separation to the historic core, with intervening fields and natural landscape features, the impact on its significance would not be affected by the proposed works.

Significance of the non-designated heritage assets and the impact on that significance

Archaeology

- 11.5.25 Para. 209 of the NPPF gives weight to the impact on non-designated heritage assets and the preamble to policy D23 of the LPDMP at para. 5.385 it explains the definition of heritage assets in the NPPF, and how those parts of the historic environment that may not be subject to a statutory designation (such as listing or scheduling) should be treated. Archaeological sites including Areas of High Archaeological Potential (AHAPs) are treated as non-designated heritage assets however, under footnote 72 of the NPPF "Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets."
- 11.5.26 The applicant has submitted a desk-based assessment of the archaeological interest on the site in accordance with para. 200 of the NPPF. The report includes the results of a geophysical survey of the Wildfields field carried out by Cranfield Forensic Institute, this concludes that there are no designated

heritage assets on the site itself and that the site has an apparently low potential for archaeological remains as evidenced by the small number of potential archaeological features suggested by the geophysics. However, the geophysical survey results do not preclude archaeological remains being present on the site as some types of archaeological features do not produce a significant magnetic signature and so may not show up on a survey. This is not a full survey, as this excluded the fields of Big Misley and Little Misley which are not yet available, so it is possible that evidence of archaeological features could be revealed by this work.

- 11.5.27 The below ground disturbance from the main solar array would be limited to the anchoring of the frames for the panels and the associated enclosures would not have significant below ground impacts. The County Archaeologist is satisfied and has no archaeological concerns regarding these elements of the proposals.

Park pales

- 11.5.28 In relation to the remnant park pales (ditches and banks designed to keep deer in the park) the applicant has submitted details in the DBA&HS and an additional Briefing Note. Drawing 'Figure 7: Boundary of Guildford deer park (Surrey HER)' TOR-H007 shows the extent of the former deer park. The south western portion overlaps with land owned by the University. The alignment is visible in natural and manmade features such as trees lines, hedgerows, banks, fencing some of which mark field boundaries.
- 11.5.29 South of Manor Farm the proposed access track would cross diagonally over an open field that historically sat within the royal deer park and would make use of an existing gap in the hedgerow within the south-western corner to navigate across the historic park pale and to connect into the next field. The additional track would have an agricultural appearance across this land parcel, so this would not diminish or weaken the prevailing rural and open character of the land.
- 11.5.30 Furthermore, the Senior Conservation Officer acknowledges that efforts have been made to minimise any physical changes to existing historical landscape features such as the park pales by using and slightly modifying an opening that already exists, as such there would be no loss in terms of historic and landscape legibility.
- 11.5.31 Excavation works would be required to construct the access road and cable trench. This would comprise open cut and HDD, this would have the potential to disturb buried archaeological features including the park pales. It would be necessary to expand the geophysical survey to encompass the cable routes and to trial trench any potential anomalies in advance of the construction works. It would also be sensible to trench the area of the park pale where it is affected by the development, so that a more detailed record could be made of this feature in advance of construction.
- 11.5.32 The report estimates that below ground disturbance of these elements would be to a depth of approximately 400mm. Previous archaeological evaluation to the east of the site suggests that archaeological features could be present at a depth of 250-350mm.

- 11.5.33 As there is a possibility that archaeological remains could be disturbed by the proposals particularly where the mapped features would intersect with any new access routes. A condition has been recommended by the County Archaeologist to require a programme of archaeological monitoring on these elements of the scheme that would require more extensive areas of disturbance so that any archaeological features would be identified and recorded before they are disturbed potentially lost.

Victorian well

- 11.5.34 A former Victorian well has been highlighted as part of the public notification process. This has some heritage value due to its historic interest with the agricultural uses of the site
- 11.5.35 This has been reviewed by the County Archaeologist and the Council's Senior Conservation Officer. As the proposed works would not be in close proximity to this structure would not affect its fabric there would be no harm from the proposed development.
- 11.5.36 Apart from the less than the less than substantial harm identified to Wildfields farmhouse. The proposed development would comply with policies D3 of the LPSS, D18, D20, D21 and D23 of the LPDMP, para. 205 and 209 of the NPPF and no other harm has been identified to the other designated and non-designated heritage assets.

Access, highway safety and capacity

- 11.5.37 Para 108 of the NPPF outlines the transport issues that should be considered. Para. 115 explains that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".
- 11.5.38 Para. 116 sets out what development should achieve in this case, d) allow for the efficient delivery of goods, and access by service and emergency vehicles; is most relevant.
- 11.5.39 Policy ID3(6) of the LPSS says that new development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable. Then policy ID3(8) related suitable access and ID3(9) the requirement for a transport statement.
- 11.5.40 A further document which is a material consideration is the Local Transport Plan (LTP4), 2022-2032 produced by the County Highways Authority (CHA). This identifies policy areas to deliver the CHA's objectives of 'avoid travel', 'shift travel mode' and 'improve energy and operational efficiency of travel', the latter covering 'efficient network management' as a policy area.
- 11.5.41 The applicant has submitted a Transport Statement (TS) and during the course of the application provided:
- Technical Note: Response to SCC Highways Request for Further Information, April 2024

- Applicant letter to GBC confirming position on permissive path claim, May 2024
- Technical Note: Section 50, August 2024

11.5.42 The TS (prepared by Stantec, Project Ref: 332110788 Rev: A, dated 08.03.2024) and additional documents above provide details of:

- options for access track;
- the impact on the local highway network both during construction and in the operation phase;
- vehicle routes;
- site access and egress;
- forecasts of vehicle movements;
- management and monitoring of construction vehicle movements;
- measures to public rights of way (PROWs);

Each aspect of the proposals shall be assessed below:

Site access and access track route

11.5.43 The three fields with the solar arrays do not have direct access to the public road network. The existing vehicular accesses are for agricultural vehicles and are not suitable. A new access track is proposed to allow for the construction, operational and decommissioning stages of the proposed development.

11.5.44 The application submitted under 22/P/02178 proposed site access from the A31 via Chalk Pit Lane. Following a Road Safety Audit, it was not possible to achieve a safe access without a significant junction upgrade, major earthworks to address the gradient issues, and unavoidable conflict with the PRoW. Therefore, an alternative option was required.

11.5.45 Other possible access from the west and north of the solar arrays have been dismissed on land ownership and rights of access issues. Access to the east of the site via the Surrey Research Park towards Stephenson Road / Priestley Road was dismissed due to the implication of ownership and impact upon trees and designated Ancient Woodland.

11.5.46 The proposed access route has been set out above and would allow vehicles to access the site by Egerton Road / Ashenden Road (Tesco) roundabout. Then would enter the private roads of the University at the Manor Park access. The whole route has been designed for two-way movements.

Public rights of way (PROWs)

11.5.47 No PROWs cross the fields for the solar arrays, although FP13, FP479, FP480, and BW447 pass through the area in which the access track runs, so has been aligned to minimise its impact. However, it would cross PROWs at three points and would run adjacent or parallel to them.

11.5.48 Following requests for additional information by the CHA, the applicant has confirmed the following:

- The visibility splays at the crossing points indicate the envelopes that are to be kept continuously clear, ensuring users of the PRow have visibility of any vehicles using the haul route and vice versa;
- Gates have been indicated at the crossing points, these being across the haul route and would not be to gate the PRow so its users would have priority;
- The gates could be closed and secured when required;
- Signage for PRow users at the gates

11.5.49 There is a permission path along the West Flexford Lane route (connecting FP53 (Wanborough) to FP446 (Worplesdon). The applicant has confirmed that they would maintain a safe and usable path along this route, with no obstructions; should the claimed path be confirmed.

11.5.50 There are bridleways which need to be safeguarded for equestrian use. The closest section of new fencing to the bridleway is at approximately 110m. Therefore this would not interfere with the route.

11.5.51 Bridleway BW447 would have three crossing points with the access road, with the surface being similar to an agricultural track and given this would affect only small sections. In those locations where the bridleway runs in proximity to the access track, a width of 4m is allowed for between the hedge and the proposed access track, exceeding the 3m minimum requested. This would ensure suitable segregation between non-motorised users of the bridleway and motorised users of the solar access track and would be acceptable.

11.5.52 The applicant has stated that they would seek to limit and manage any impacts on the bridleway during the temporary construction period. However, it may be necessary to temporarily close or divert a PRow, to facilitate the construction, this would require an application to be made to the County under other relevant legislation.

11.5.53 The CHA are satisfied with functioning of the PRow would not be harmed and have suggested appropriate conditions.

Construction and decommissioning

11.5.54 The construction phase would involve the works as set out in the proposal section above. It is estimated this would take 70 weeks with some overlap of stages. The decommissioning at the end of the 35-year operational term (or sooner) would take approximately 6-9 months.

11.5.55 It is estimated that the average number of weekly inbound heavy good vehicles (HGVs) and van construction trips would be 68 with a weekly peak of 140 trips. This is an equivalent daily peak of 56 inbound/outbound trips. The number of weekly and daily trips would vary depending on the exact activities happening on site and could be exacerbated by overlap between construction stages in the programme, as described above.

11.5.56 HGV movements are forecast to be a peak of 120 one-way trips in a week, the equivalent of 48 two-way movements per day. If these peak HGV movements were to occur periodically throughout the day in and out of the site, this would be the equivalent of 5–6 two-way HGV movements within any given hour. The increase in movements would not have an adverse impact on highway capacity.

- 11.5.57 It was originally proposed to carry out Horizontal Directional Drilling (HDD) under the A3 along Egerton Road a section of the cable route. Following discussions between National Highways who were concerned about the risk to their infrastructure, the CHA agreed that there would be scope for the applicant to apply for a Section 50 licence to allow them to carry out open excavation instead. This has resolved the matter and would be subject to a more detailed application to the CHA.
- 11.5.58 The CHA are satisfied this would not have a harmful effect on the highway safety and capacity on the local road network.

Cut and fill

- 11.5.59 This would include cut and fill works for the spoil area by Manor Park and from the HDD, as well as for the materials exported and imported for the access track. This would require the use of tipper lorries which would either enter or leave the site with material.
- 11.5.60 In summary from section 6.2 of the Transport Statement:
- removal of the spoil heap -18 two-way movements a day over a three-week period
 - removal of materials from the earthworks for the access track - 19 two-way movements a day over a 12-week period
 - material for the access track laydown would be 37 two-way movements a day over a 12-week period.
- 11.5.61 It is anticipated that the tipper lorry movements associated with the access track laydown would arrive periodically through the working day to supply the required material. As such, the access track laydown is forecast to result in approximately 4 tipper movements in an hour.
- 11.5.62 The CHA has assessed the vehicular movements associated with the removal of spoil and have raised no objection.
- 11.5.63 At sections 5.5, 5.6 and 7 of the Transport Statement the applicant has indicated how the works and vehicle movements would be managed and monitored. To mitigate the impacts of these during the construction period a condition to secure a construction transport management plan (CTMP) at both the construction and decommissioning phases would be suitable.
- 11.5.64 The applicant has stated at para. 5.7.3. of the TS that they would minimise activity that would conflict with staff arrivals at the University and Royal Surrey County Hospital. This would be reasonable to include in the condition, given the local congestion experienced at peak travel times.
- 11.5.65 There would be short lived harm to local amenity arising from construction traffic movements and site-work. Such construction period activity is likely to result in unavoidable impacts to residents, drivers, and pedestrians. However, all the evidence suggests that there would be no significant detriment to highway safety and capacity. Furthermore the effects could be managed through a CTMP, at both the construction and decommissioning phases.

11.5.66 The CHA has requested on-site EV charging, as site access would be for maintenance, with short dwell times, on average once a month and given the nature of the development. This requirement would not be reasonable to make the proposals acceptable in planning terms.

11.5.67 Overall, the proposal would not have a severe impact on highway safety, or residual cumulative impacts on the road network capacity in the area, given the comments received from the CHA and National Highways, so the proposal would be acceptable in this regard. This would accord with the objectives of policy ID3 of the LPSS and the NPPF.

11.6 Impact on protected species and biodiversity

11.6.1 Para. 180 of the NPPF sets out the principles that should be applied to habitats and biodiversity. Policy ID4 of the LPSS seeks to contribute to biodiversity.

11.6.2 Policy P6 of the LPDMP outlines that development proposals for sites that contain or are adjacent to irreplaceable habitats, priority habitats, habitats hosting priority species, sites designated for their biodiversity value and all aquatic habitats are required to preserve the relevant ecological features through the application of the mitigation hierarchy.

11.6.3 Renewable energy developments offer substantial opportunities for biodiversity net gain. The Building Research Establishment (BRE) has produced detailed guidance in this regard and recent developments have seen renewable developments achieve net gains as high as 178%. Policy D17(3) responds to this and requires schemes to be managed to maximise opportunities for biodiversity.

11.6.4 The application has been supported by the following documents:

- Ecological Impact Assessment (ECiA), Prepared by ECOSA, December 2022
- Biodiversity Net Gain Assessment Report, Prepared by ECOSA, December 2022
- Ecological Management Plan (EMP), Prepared by ECOSA, January 2023
- Habitat management and monitoring plan (HMMP), Prepared by ECOSA, March 2024
- Biodiversity Net Gain Design Stage Report, Prepared by ECOSA, March 2024
- Responses to Ecological Consultations: Prepared by ECOSA, August 2024
- Biodiversity Net Gain Stage Report and Metric– Rev 1: Prepared by ECOSA, August 2024
- Ecological Impact Assessment Addendum (ECiA): Prepared by ECOSA, August 2024
- Ecological Mitigation Strategy (EMS) – Rev 4: Prepared by ECOSA, August 2024

11.6.5 Surrey Wildlife Trust (SWT) have been consulted with and have been provided with the confidential badger reports as the specialist advising the LPA.

11.6.6 The information submitted by the applicant shows that a number of surveys have been undertaken over a number of years between 2014 and 2020, April 2022, February 2024 and June 2024.

Below an assessment has been made regarding each relevant species and habitat:

Habitats

- 11.6.7 This include artificial unvegetated; unsealed surface, blackthorn scrub, bramble scrub, cereal crops, developed land; sealed surface, lowland mixed deciduous woodland, mixed scrub, modified grassland, other broadleaved woodland, other neutral grassland, other woodland; mixed, ruderal/ephemeral vegetation, rural/urban trees, temporary grass and cover leys, species-rich native hedgerow, other native hedgerow and ditches.
- 11.6.8 A single area of previously modified grassland surveyed in February 2024 was reclassified to other neutral grassland in June 2024, due to its greater species diversity being recorded.
- 11.6.9 The proposed cable route between the Wildfields field and Big Misley also crosses areas of other woodland.
- 11.6.10 Along the site boundaries broad-leaved woodland associated with Wildfields Copse, and Misley Copse. There are areas of woodland in the vicinity of the site some of which are ancient woodland.
- 11.6.11 0.2km sections of hedgerow (under five metres in width) would need to be removed to facilitate some crossings.
- 11.6.12 The proposals would result in the loss of:
- 14.69ha cropland
 - 1.23 ha modified grassland
 - 7.36ha neutral grassland
 - 0.02ha scrubland
 - 0.06ha lowland mixed deciduous woodland
 - 0.01ha other broadleaved woodland

Bats

- 11.6.13 The field boundaries surrounding the site, boundary woodlands including ancient woodland and boundary hedgerows provide high suitability for foraging and commuting habitat as they are well-linked to wider blocks of woodland and mature hedgerows in the surrounding area.
- 11.6.14 A large number of trees are present around the boundary of the site, many of which are likely to support potential roost features. However there are none in the red line boundary for development.
- 11.6.15 The development adjoins trees and woodlands and whilst they are not in the redline for development, these could well be used by roosting bats. Therefore, as suggested by SWT a condition for and updated preliminary ground level tree roost assessments, would be appropriate before works commence.

Badger

- 11.6.16 Under the Protection of Badgers Act 1992, it is an offence to harm a badger or interfere with its sett. Whilst badgers are not rare, due to the cruelty towards them by some individuals, the whereabouts of their setts are not in the public domain. Two Confidential Badger Reports have been reviewed by officers and Surrey Wildlife Trust, the location of the setts or foraging grounds shall not be referenced in this report.
- 11.6.17 There is a suitable range of foraging and sett building opportunities associated with grassland arable fields, hedgerows and woodland.
- 11.6.18 Following responses from third parties and the West Surrey Badger Group (WSBG), a further walkover survey was carried out in June 2024.
- 11.6.19 A further updating badger survey would be undertaken no more than six months prior to the start of works on site. Should the status of badger at the site change in the interim period then the mitigation measures may have to be revised. The survey work would be required by condition.
- 11.6.20 Surrey Wildlife Trust (SWT) have raised concerns that badgers would be excluded with no direct and immediately access into the grassland/fields. Therefore, the requirement for gates as suggested by the applicant shall be required in the LEMP. In addition to this, mitigation and enhancement strategy for the lifetime of the development.

Birds

- 11.6.21 The site boundaries support high quality nesting habitat in the form of broadleaved woodland and mature hedgerows, with the arable fields providing habitat for ground nesting birds. The open grassland, boundary woodland and hedgerows also provide opportunities for wintering species.
- 11.6.22 The species recorded during 2022 include skylark, yellowhammer, linnet, mistle thrush, wren, crossbill, marsh tit and song thrush. The site also provides common and widespread habitats for wintering birds.
- 11.6.23 Skylarks are listed as important for conservation and biodiversity under Section 41 of the Natural Environment and Rural Communities Act (2006). Furthermore, on account of the decline in its breeding population it is a Bird of Conservation Concern and on the Red List of threatened species.
- 11.6.24 Five skylark territories would be lost on the three fields for the solar arrays and a minimal loss of 0.07 hectares of woodland and 210 metres of hedgerow.
- 11.6.25 The site supports two breeding territory of marsh tit and supports a good diversity of breeding red and amber listed bird species.
- 11.6.26 Surveys were not carried out, the applicant asserts that given that the site has already been assessed as being of local to county value, this already takes a suitably precautionary approach in evaluation terms, any additional survey data gathered would be highly unlikely to affect the overall evaluation undertaken as part of the assessment.

- 11.6.27 The development would result in the loss hedgerows which have not all been surveyed and whilst there would be replacement planting this would take a number of years to mature and replace the lost habitat for nesting birds. Therefore, to reduce the amount and period of net loss of hedgerows, it is proposed to have phased clearance in the CEMP and advance planting in the LEMP, by condition. This approach is satisfactory to SWT.

Reptiles

- 11.6.28 The site provides suitable habitat for reptiles comprising the grassland in Wildfields, grassland margins in Big Misley and Little Misley, other neutral grassland and modified grassland along the cable route in the east of the site. These habitats are connected to other suitable habitat in the area.
- 11.6.29 A low population of slow-worm and a low population of grass snake were recorded on the site during the surveys undertaken within all three fields. No other reptile species were recorded. On a precautionary basis, the applicant has accepted that there could be assumed that a very a low population of common lizard and adder. Therefore, mitigation measures would be required and once the development is complete the reptile fencing would be removed to allow for free movement.
- 11.6.30 It has been argued by the applicant that as the fields to the east are poorly connected to the fields to the west from a reptile perspective, this would be unlikely to result in good dispersal across the entire site. The reptile habitat present are also very common across the landscape and these habitats could be found to the south and east of the site for many kilometres. It should also be noted that should three/four reptile species be present these are all at very low numbers (i.e. in below detectability in the survey undertaken). Therefore, taking into account the above the evaluation could be revised to local to county value on a precautionary basis.
- 11.6.31 The development would result in the loss of 9.71ha of reptile habitat during the construction phase.
- 11.6.32 At the decommissioning stage, updated ecological surveys would be required to determine whether any mitigation is required for impacts on their habitat. It would be appropriate to secure this by condition.
- 11.6.33 SWT are satisfied overall that whilst there are not survey for areas outside the red line the proposed mitigation strategy is a suitable approach.

Great Crested Newt (GCN)

- 11.6.34 No ponds are present within the site itself, however, there is suitable terrestrial habitat for great crested newt including grassland margins, other neutral grassland, woodland and hedgerows. The survey work undertaken in 2022 did not identify any great crested newt within the survey area.
- 11.6.35 However, there have been historic records of great crested newt in the area (approximately 110 metres to the north-west, which was recorded as a negative result in 2022 but positive in 2014) and due to some inherent limitations with the survey methods it is considered possible that great crested newt may continue to persist in the wider area.

- 11.6.36 The applicant has agreed to use the Nature Space District Licence, under the District Licences granted by Natural England. This would mitigate the effects on Great crested newts.

Hazel dormice

- 11.6.37 Previous surveys dated from 2014, so tubes were deployed in August 2023 to the south of the site where the proposed scheme does not affect any suitable habitat.
- 11.6.38 The woodland habitat was not surveyed, so SWT are not satisfied that there is a baseline understanding on the likely absence of hazel dormice. Although they do acknowledge the limitations to the collection of survey data.
- 11.6.39 There would be some loss of habitat due to the hedgerow removal, so the approach suggested above for nesting birds would be suitable. This would be suitable mitigation.
- 11.6.40 SWT have identified severance of tree canopies, however, have not identified any specific locations. On review of the plans the spur of the access track where it turns to the north west to follow the alignment of PROW footpath 479, the track would go through an area where the tree canopy is cleared and then due to a lack of management the hedgerows either side of the PROW have become overgrown and in areas along this stretch there is canopy crossover. It would be reasonable to have tree canopy connections as hop overs, in these locations. This could comprise a specialised, mini rope bridge which has recently been deployed in the Forest of Dean. These measures would be secured in the LEMP condition.

Invertebrates

- 11.6.41 The majority of the site supports relatively poor-quality habitat for terrestrial invertebrates with cultivated arable fields and grasslands of relatively limited diversity.
- 11.6.42 The hedgerows provide suitability for supporting brown hairstreak, which was recorded in the desk study, the species feeds on blackthorn *Prunus spinosa* which is widespread on the site. The boundary woodland and hedgerows and log piles in the east of the site are also likely to provide suitable habitat for stag beetle and white admiral. The habitats of relative interest are the boundary woodlands including the ancient woodland present around the boundaries of the site.

Other Relevant Species

- 11.6.43 The site supports suitability for both common toad and European hedgehog. A number of ponds are also present in the wider area which could provide breeding habitat for common toad.
- 11.6.44 In order to mitigate the actual and potential effects from the development the following mitigation measures are proposed:
- Retained trees, hedgerows, woodland and SNCI would be protected during the construction period with Root Protection Zones established in accordance with BS 5837:2012;

- A 15-metre buffer from ancient woodland (British Standards, 2012);
- The majority of the work to install the cable route would be undertaken using a cable plough which will have a very low impact on retained habitats and 3 metre width would recolonised;
- Horizontal Direction Drilling (HDD) depth under any woodland should be not less than 3.0m, to fully avoid root zones and mycorrhizal networks;
- 18.04ha of grassland to be created outside of the retained margin for reptiles;
- 1.66km of new native hedgerows would to be planted across the site, around the boundaries of the existing fields and along the proposed access track;
- Three areas of native species for 0.99ha, woodland planting are also proposed within the site;
- 0.0065ha of scrubland would be re-established;
- A new pond is to be created in the north-east of the site;
- 20 bird and bat boxes would be installed on suitable trees across the site;
- No external lighting is to be used during the operational phase of the development;
- During the construction phase of the development lighting would be kept to an absolute minimum for health and safety reasons;
- A minimum buffer of 20 metres from any built form or construction activities to badger setts. Where this is not possible a licence would be sought to close any active setts;
- Badger gates and gap would be installed in the perimeter fencing;
- 2.4m high timber post and wire perimeter fencing as deer protection;
- Precautionary approach to clearance works, to not disturb hibernating hazel dormice;
- vegetation clearance would be undertaken outside the breeding bird season;
- 11 owl boxes;
- Five kestrel nest boxes;
- Site margins would be sown with a bumblebird mix;
- Translocation exercise and destructive search exercise of slow worms and grass snakes;
- 18.51ha of new reptile habitat (net increase 8.8ha);
- Five hibernacula in site margins;
- District Level Licence for compensation for great crested newts;
- Invertebrate habitat creation;
- five log piles and five loggeries;
- south facing banks would also be created along the northern edge of all three fields with areas of bare earth to increase habitat diversity; and
- Hedgehog gap would be provided in the security fencing/

11.6.45 The perimeter fencing would allow for mammals to continue to travel through the site impeded, however it would be robust enough to protect the solar array from roaming deer.

11.6.46 The applicant has set out the key concepts that they would implement as part of a Construction Environmental Management Plan (CEMP). A condition for a finalised scheme shall be required by condition.

11.6.47 A Landscape and Ecological Management Plan (LEMP) would provide the details of the finalised measures to mitigate the impacts of the development alongside the additional badger survey, potential reptile translocation and skylark mitigation. These would be secured by way of conditions.

Biodiversity Net Gain (BNG)

- 11.6.48 Targets are set at both a national and local level. Within Section 98 of the Environment Act 2021, there is provision for achieving a 10% Biodiversity Net Gain (BNG) within a development, with the particulars being covered under Schedule 14 of the Act. The secondary legislation came into effect on major development 12.02.2024. As this application was submitted after this date, mandatory BNG is required.
- 11.6.49 There is a local requirement of 20% BNG under policy P7 of the LPDMP and this carries full weight.
- 11.6.50 The application has submitted a Biodiversity Net Gain Design Stage Report, which sets out their strategy for the scheme.
- 11.6.51 This is a summary of the pre-development and post development units figures and percentage increase figures:

Unit type	Pre-development	Post-development	Percentage change in units %
Habitats	154.02	190.66	23.79
Hedgerow	28.41	42.30	48.88
Watercourse	0.99	1.34	34.71

- 11.6.52 A Biodiversity Net Gain Assessment has been undertaken using DEFRA's Biodiversity Metric Calculation Tool (version 4.0). The proposed development would achieve a biodiversity net gain is set out in the table above, along with further ecological benefits through the proposed ecological plans.
- 11.6.53 The proposals would largely focus on the loss of low distinctiveness habitats such as cropland and modified grassland. Losses to higher distinctiveness habitats would occur associated with loss of lowland mixed deciduous woodland along the access route and occasional area of hedgerow loss. The majority of the habitats outside the main solar farm would be either retained or restored to their original habitat and condition and returned to agricultural use.
- 11.6.54 The main delivery of biodiversity units would be around the main solar farm site itself which will include the delivery of other neutral grassland, pond creation, planting of lowland mixed deciduous woodland and creation of a number of new hedgerows.
- 11.6.55 Consequently, the loss of existing habitats is largely restricted to lower quality (low distinctiveness) habitats, with smaller losses of higher distinctiveness habitats, and gains are made through provision of higher quality habitats.
- 11.6.56 This would meet the requirements of policy P6 of the LPDMP and also serve to contribute to the Biodiversity Opportunity Area (BOA) in policy ID4 of the LPSS.
- 11.6.57 To ensure that the final scheme meets these requirements a Biodiversity Net Gain Plan (BNGP), would be required by condition.

11.6.58 Surrey Wildlife Trust have been consulted on the proposed development, including the additional information and clarifications in the SNCI, habitats, species and BNG. They have confirmed that subject to conditions they are satisfied there would be no material harms.

11.6.59 The applicant has demonstrated that the proposal provides a measurable net gain in biodiversity, subject to the implementation of measures and would not result in harm to habitats and species subject to suitable mitigation and other enhancements. The development proposals would be in accordance with the Conservation of Habitats and Species Regulations 2017, Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and the Wildlife and Countryside Act 1981. This is in accordance with policy ID4 of the LPSS, policies P6 and P7 of the LPDMP and the NPPF.

11.7 Impact on trees and vegetation

11.7.1 Para. 136, 180(b) and 186(c) of the NPPF places great value on trees and woodland. Policy ID4 of the LPSS includes parks and open spaces, private gardens, agricultural fields and allotments, hedges, trees and woodlands, green roofs and walls, watercourses, reservoirs and ponds. Policy P6 of the LPDMP seeks to retain trees and new planting to connect and/or extend canopies, as well as safeguards significant trees, requiring development proposals for sites that contain significant trees to incorporate them and their root structures and understorey in undeveloped land within the public realm, and to provide green linkages between them. Policy P7 outlines that new tree planting should be provided within developments.

11.7.2 The application has been supported by an Arboricultural Impact Appraisal and Method Statement and tree protection plans (TPPs). There are also further details in the PD&A Statement addendum and additional email responses from the applicant, addressing questions and concerns raised by the Woodland Trust, Forestry Commission and Surrey Wildlife Trust.

11.7.3 The tree survey and tree categorisation are as per the requirements of BS 5837:2012 'Trees in Relation to Design, Demolition and Construction'. The Council's Tree Officer agrees with the categorisation. The site lies adjacent to a number of ancient woodland designations and as such, proposals are required to take into account local and national policy and requirements relating to this.

11.7.4 The British Standard (BS5837:2012) states that trees in categories 'A', 'B' and 'C' are all a material consideration in the development process, the retention of category 'C' trees, being of low quality or of only limited or short-term potential, would not normally be considered necessary should they impose a significant constraint on development. 'U' category trees are in such a condition that they are unlikely to contribute beyond 10 years and may be removed as part of good arboricultural practice, irrespective of any development proposal.

11.7.5 The site is in a sensitive location which included woodland that has been designated as ancient semi-natural woodland (ASNW), and therefore must be protected in accordance with the Forestry Commission and Natural England standing advice and the NPPF.

11.7.6 A joint site visit was undertaken by the Council's Tree Officer, the Forestry Commission and Surrey Wildlife Trust 18.05.2023.

Tree removal

11.7.7 The Tree Survey Schedule found at Appendix 2 of the Arboricultural Impact Appraisal and Method Statement and details the trees, groups of trees, shrub masses, and hedgerows growing within or immediately adjacent to the application site that would be removed, this is a summary from Table 1:

- a section of Category B woodland;
- 8 no. of category C tree groups;
- parts of 7 no. of category C hedges ;
- 3 no. of category C tree
- 8 areas of category C hedgerow; and

11.7.8 It is proposed to use special precautions to protect:

- 3 no. of category A trees and woodland;
- 18 no. of category B trees and tree groups;
- 1 no. of category B woodland
- 15 no. category C trees and tree groups.
- Category U trees - for management reasons regardless of the proposed development.

11.7.9 The report outlines that the tree removals are for low quality trees and short sections of hedgerow, with their losses being noticeable in the immediate vicinity. However, the comprehensive new landscaping proposals would rapidly mitigate these losses. It concludes there would be no impact on the wider setting of the site in the longer term. The area of woodland to be removed is set well within the site, it is not ancient woodland and is of poor quality. The Tree Officer is satisfied that the removal of these trees and hedges would not have a harmful impact upon local character.

Tree protection

11.7.10 The Report indicates that there would be limited encroachment into the root protection area (RPA) of retained trees due to the cable installation requiring some form of excavation, most of the works would involve a cable plough. In sensitive areas Horizontal Direct Drilling (HDD) would be employed with catch/retrieval pit compounds located outside protected RPAs.

11.7.11 Where existing services within RPAs would require upgrading, hand excavation may be necessary. Furthermore, a no dig surfacing would be used to ensure no disturbance to the roots of retained trees.

11.7.12 It is necessary to use horizontal direct drilling (HDD) beneath part of Wildfield Copse (not an ancient woodland) for the cable route (see tree protection drawings are Ref 22093-6 1 and 22093-6 1). The Report outlines that the HDD would be installed from a pit excavated outside the RPAs and then drilled at a depth no shallower than 3.0m below ground to avoid root damage, (which would be greater than the standard 2.0m depth and in some places it could be deeper). As such, the Report concludes there would be no detrimental

impact on the woodland as a result of the works. This would preserve the important root and soil structures.

- 11.7.13 The submitted Report explains how risks to trees would be managed on site. This includes a pre-commencement meeting with the site manager and relevant contractors along with the Council's Tree Officer. This meeting and the tree protection measures would reduce the risk to the trees during construction and could be safeguarded by condition.

Ancient woodland and veteran trees

- 11.7.14 The only area where HDD is directly relevant to ancient woodland is the short cable connection (approx. 41 m in length) between the Big and Little Misley solar fields. See drawings tree protection overview, 22093-6- Overview and detailed drawings 22093-6-1 these show the extent of Ancient Woodland and its buffer zone.
- 11.7.15 In this location the original intent was to carefully align the cable route through an existing gap between trees and the ancient woodland. This has now been discounted in favour of a very short section of HDD between these two solar fields. The HDD would not run beneath the ancient woodland itself and relates only to its 15m buffer zone. The use of underground HDD therefore avoids any direct surface effect on the 15m ancient woodland buffer zone, or other any other trees in that location. These works would again be done at a minimum depth of 3.0m.
- 11.7.16 Following concerns raised by the Woodland Trust. The PD&A Statement Addendum para. 2.4.244 confirms that HDD would take place under ancient woodlands. The entry and exit HDD pits would be located outside of the 15m buffer zone. Further safeguarding the 15m buffer zone, in accordance with standing advice.
- 11.7.17 The Woodland Trust identified potential veteran trees, specifically T254 and T384. The applicant's arboriculturist has reviewed this suggestion and advised that neither tree is yet a veteran and 15m buffer would be maintained, and so the full RPA in accordance with BS5837:2012, see para 2.4.246 of the PD&A Statement Addendum. Construction would be limited to one side of the trees, so there would be ample unrestricted root volume in all other directions. The Woodland Trust are satisfied and have withdrawn their concerns.

Tree planting

- 11.7.18 Drawings showing the landscaping strategy and planting plans have been submitted, alongside the ecology enhancements.
- 11.7.19 This includes additional planting south east of Little Misley solar field with a mixed native woodland planting, together with a further area to the south east of the Big Misley solar field. The landscape strategy also seeks to plant up existing hedgerow gaps where this is possible.
- 11.7.20 The Forestry Commission have suggested additional native planting on the existing track to the east of the linear part of ancient woodland to improve connectivity. The existing track in part is subject to third party land interests and therefore planting cannot be delivered in that area. Beyond that the margin areas identified between the ancient woodland buffer and the

proposed track are also subject to the route of the electricity export cable route, itself subject to future easement restrictions. The areas identified also fall within the Blackwell Park site allocation which requires masterplanning. Therefore, it is not possible to deliver this.

- 11.7.21 Connectivity between woodlands (ancient or not) with additional woodland planting and to plant up existing hedge gaps, would increase landscape and visual screening and contribute towards biodiversity net gain.
- 11.7.22 The Council's Tree Officer has had the opportunity to review the revised documentation and the applicant's responses to queries raised by Surrey Wildlife Trust, The Woodland Trust and The Forestry Commission. They are satisfied that the development proposals would be in accordance with the British Standard - BS5837:2012. Satisfactory protection would be provided to ensure all retained trees are protected throughout development in the form of barriers and/or ground protection and any tree loss has been justified. As a whole it is considered that the proposal is in accordance with policy ID4 of the LPSS, P6 and P7 LPDMP and the NPPF.

11.8 Flooding, flood risk and groundwater protection

- 11.8.1 Chapter 14 of the NPPF sets out how the planning system should meet the challenge of climate change, flooding and coastal change.
- 11.8.2 Policy P4 of the LPSS outlines that all proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. Policy P11 of the LPDMP outlines that drainage schemes are required to intercept as much rainwater and runoff as possible and that greenfield sites are required to achieve runoff rates and volumes consistent with greenfield conditions.
- 11.8.3 The application has been supported by a Flood Risk Assessment (FRA) and Chapters 3 and 5 in the PD&A Statement.

Fluvial flooding

- 11.8.4 The application site is located on land which is identified as being within Flood Zone 1m with a low risk of flooding – an annual probability of less than 0.1%. Therefore it is considered that the site would not be impacted by fluvial flood risk even when climate change is considered. In this instance a Sequential Test or Exception Test are not required.

Surface water flooding

- 11.8.5 Part of the application site are identified as having a high probability of flooding. Other parts of the site fall within the medium and low risk category.
- 11.8.6 The solar array, its ancillary structures and the access track would increase the impermeable surfaces. The solar panel arrays are set on supports and raised above the ground; therefore, any rainfall would be able to flow between/underneath the panels and either percolate or flow overland towards the existing drainage receptors. Any additional surface water runoff would be mitigated via the installation of swale and filter drains, due to the underlying clay soil.

- 11.8.7 The access track and enclosures surrounding the transformer cabins would be surfaced in permeable stone which would allow runoff to permeate through the upper soil layers. The submitted FRA notes that the change in run-off characteristics of each parcel of land arising from the introduction of small areas of impermeable surface is in effect zero as the percentage of the parcels changed from greenfield to impermeable is less than 0.1% of the total parcel areas. Management of surface water from the very small impermeable areas would be via shallow boundary swales with a 100mm diameter piped outfall to the nearest ditch. It is also proposed to incorporate filter drains to capture roof water from the inverter/control cabins with piped connections to the nearest on-site swale.
- 11.8.8 In addition, the following mitigation measures will be employed to further reduce flooding risks:
- the proposed transformer and GRP cabins would be set on a 200-300mm plinth above external ground level to mitigate against the residual risk of surface water ingress in an extreme rainfall event; and
 - the solar panel arrays would be raised above the ground on supports and therefore there will not be a significant impact on the existing drainage regime of the site.
- 11.8.9 The Lead Local Flood Authority (LLFA) have been consulted on the proposals. They have raised no objections to the development, subject to standard conditions.

Groundwater

- 11.8.10 Part of the access track and cable route are in a Surface Water Drinking Water Protected Area. There would be groundworks which has the potential to case pollutants to enter the groundwater which is used for abstraction.
- 11.8.11 As the excavation would not be more than 3-5m in depth the risk of drinking water contamination would be limited and therefore, future safeguards are not necessary given the nature of the works. However, to prevent the risk to groundwater during the construction phase, this could be mitigated through measure in the Construction Environmental Management Plan (CEMP).
- 11.8.12 It is concluded that the proposed development would be at a low risk of flooding and would not increase flood risk elsewhere. The planting of species rich grassland and implementation of a sustainable surface water strategy, using natural swales and ditches, would help to reduce surface water run off rates in comparison to agricultural land, where bare soils are evident. Also, healthier soils would be able to support natural surface drainage and attenuation reducing the impacts of severe rainfall and the related flooding impacts.
- 11.8.13 The proposed development therefore accords with policy P4 of the LPSS, P11 of the LPDMP and the NPPF.

11.9 Neighbour amenity

- 11.9.1 Policy D5 of the LPDMP outlines that proposals are required to avoid having an unacceptable impact on the living environment of existing residential properties.

11.9.2 In terms of neighbouring properties the site is relatively isolated, however, there are a number of dwellings and farmsteads in the immediate vicinity. The following properties are those which are closest to the site:

- Wildfields Farm to the north-east of Wildfields field (50m from the house to the field boundary);
- Bushy Farm to the north-west of Wildfields field (40m from the house to the field boundary);
- The Folly to the west;
- North End Cottage to the south-west;
- Blackwell Farm to the south-east;
- Wellington House to the south-east;
- various properties at Down Place to the south-east;
- Chalk Pit Farm Cottages to the south;
- Flexford Farmhouse and The Old Dairy to the south-west;
- Crann Dara to the south-west; and
- Rathfarnham House to the south-west.

Construction and decommissioning phases

11.9.3 It is noted that the potential effects during the construction and decommissioning phases include disturbance and pollution from construction traffic, dust and other emissions from construction activities including the potential for noise and dust emissions from on-site activity. In the main, these activities are of a temporary nature.

11.9.4 In terms of the disturbance created during construction and decommissioning, this is an inevitable consequence of any large-scale development project. However, the Local Planning Authority would seek to protect the amenity of surrounding residents so far as possible. These measures include conditions for the approval of a Construction Transport Management Plan (CTMP) and Construction Environmental Management Plan (CEMP).

11.9.5 A restriction on working hours would not be reasonable in this instance as the works involving the cable plough would be less intrusive. There would be two horizontal directional drilling (HDD) sections (with the associated entry/exit pits) and works for the access track all within 360m from the dwellinghouse at Wildfields Farm. Due to the number of works and the use of heavy equipment in close proximity of this residential use, it would be appropriate to require measures to protect their amenities in the CEMP, which would be secured by condition.

11.9.6 The nature of the other works and proximity of residential dwellings, would not on balance, result in any undue noise and disturbance. There are also safeguards under The Environmental Protection Act 1990.

Operational phase

11.9.7 During the operational phase, the potential effects identified with this type of development arise from 'glint and glare' and, though low level, any undesirable noise generation from equipment or the low-level traffic and activity required for maintenance of the facility.

- 11.9.8 The applicant has submitted a Noise Impact Assessment and a Solar Photovoltaic Glint and Glare Study.
- 11.9.9 The Noise Impact Assessment notes that on a day-to-day basis during the operation of the facility noise impacts could result from the equipment being used including the substation, invertors and switchgear. The assessment undertaken by the applicant considers a worst-case scenario, such as all plant operating simultaneously at full load. In reality it is noted that during the night-time period the inverter's fans are likely to operate at reduced capacity etc. Even taking the worst-case scenario the assessment concludes that the proposed development would give rise to rating sound levels that are below the measured background sound level in the area, thus giving rise to a 'low impact'. The assessment also identifies that there would be no significant change in ambient sound levels at nearby surrounding receptors. Therefore, the proposal would give rise to noise impacts that would be categorised as 'No Observed Adverse Effect Level' (as per PPG noise guidance). This means that 'noise can be heard, but does not cause any change in behaviour, attitude, or other physiological response. Can slightly affect the acoustic character of the area but not such that there is a change in the quality of life'.
- 11.9.10 In terms of glint and glare the submitted Solar Photovoltaic Glint and Glare Study assesses the possible effects of glint and glare from the development on road safety, residential amenity, PROWs and SHNL and railway operations and infrastructure. For this section the impact on residential amenity WOULD be discussed. The impacts of glint and glare on the other possible receptors would be (have already been) discussed in other sections of the report.
- 11.9.11 Given the elevation and angles of the solar panels, the modelling undertaken by the applicant indicates that solar reflections are geometrically possible towards 16 out of the 25 assessed dwelling receptors. However, it is noted that when existing screening is taken into consideration none of the 16 dwellings would have visibility of the reflective area. Therefore, no impact is predicted and the applicant notes that no mitigation is required. It is noted that in the majority of cases, this existing screening consists of dense woodland and long-established field boundaries. In addition, the proposed planting submitted with the application shows that new hedgerows would be planted, as well as areas of new native woodland. This new planting would be secured by condition. Together, these measures would provide a robust screening to the dwellings identified and as such the Local Planning Authority agrees that no further mitigation is required in this regard.
- 11.9.12 It is acknowledged that once operational the proposal would generate some comings and goings of vehicles and that this may result in some noise and general disturbance to dwellings in the surrounding area. However, it is important to note that the access to the facility would be from the east and exclusively on University land. As such, any impact from vehicle noise would be mainly limited to the properties which are owned and controlled by the applicant. There would be no additional vehicle movements to the west of the site, where the majority of the private (third party) dwellings are located.
- 11.9.13 In addition, during operation access requirements to the site would be limited to maintenance and management activities only. These would include quarterly site inspection visits typically by cars or vans, grass cutting would be undertaken twice a year and annual cleaning and maintenance undertaken. Hedgerows on and bordering the site would also require

maintenance (likely to be in the form of a tractor with appropriate hedge cutter arm), along with general habitat maintenance. It is noted that this is likely to be less intensive than the existing agricultural uses on the site. As such, there would be a very limited number of vehicle movements to the site over the course of any given year (the applicant suggests approximately 12 movements per year). Even if this figure is considered to be conservative, it is clear that the movements associated with the operational phase of the development would not be at a level which would lead to a material loss of amenity to the surrounding residential properties.

11.9.14 In terms of privacy, it is noted that the facility would have operative onsite on a daily basis – the activity associated with the operational phase has been explained above. Due to this there would be no harm caused to the privacy of existing properties. In addition, it is noted that while views of the development may be possible from some surrounding dwellings this would not result in any conflict with the Council's policies.

11.9.15 As a result the proposals are considered to accord with the requirements of policy D5 of the LPDMP and the NPPF.

11.10 Alternatives considered

11.10.1 The proposals would result in harm to both the Green Belt and to the landscape qualities of the land on which the proposed development would be sited.

11.10.2 Below the reasons what they alternatives were discounted shall be set out and an assessment made of whether this a satisfactory approach. Again each of the elements of the proposed development shall be assessed separately.

Doing nothing

11.10.3 The 'Principle of development' section above sets out the concerns and threats identified from climate change and greenhouse gas emissions at the international, nation and local levels. Also in recent years the need for energy security.

11.10.4 In the absence of positive action to respond to climate change and Council's own Climate Emergency, through the decarbonisation of the electricity supply system and associated reductions in greenhouse gas emissions, the recognised objectives would not be met.

11.10.5 Also, other related goals would also not be fulfilled, including the protection of soils, biodiversity and habitats, reductions in flooding, the increased storage of carbon and ultimately the protection of scenic beauty itself, as the effects of unchecked climate change would inevitably lead to degradation of the SHNL landscape.

11.10.6 By taking no action to deliver as much needed renewable energy infrastructure, to address the damaging effects of climate change on the SHNL, has the potential in the long term to fail in the duty of furthering the purpose of conserving and enhancing the natural beauty of the area, as required under the S245 of LURA.

11.10.7 In the short term, no action would fail to deliver the decarbonisation of the grid and would affect the financial security of the University who would have to rely on the grid supply which is under stress, more expensive, restrict the growth of high energy consumption data storage and artificial intelligence (AI), the transition from gas to electric boilers for heating and air source heat pumps.

Using previously developed land

11.10.8 A large number of third-party comments relate to using brownfield sites also known as previously developed land (in Annex 2: Glossary of the NPPF). For roof mounted solar panels on University and research park buildings and for having car park canopies.

11.10.9 The 'Planning, Design and Access Statement' para. 4.73-4.93 sets out the matters considered and why they were discounted, in summary:

- the University estate has the potential to generate 21.6MWp through solar energy (12.2MWp from the ground mounted panels and 9.4 MWp from roof tops and car park canopies);
- not all roof tops or car parks would be available or technically suitable for solar given that existing trees, building and other structures would shade car park areas, reducing their potential generation capacity;
- 22/P/01429 granted permission for an Energy Centre located on the Stag Hill campus. The intention is for the Blackwell Farm solar facility to also export electricity to the Energy Centre to power the air source heat pumps, electric boilers and battery storage facilities and so that the University's gas-fired boilers could be stood down and retained as back up only;
- solar panels are mounted on existing buildings (such as the Learning Resource Centre, 6G Innovation Centre, the Innovation for Health building, Advanced Technology Institute, the AQA building, the Vet School Medicine Buildings) and soon to be on Stag Hill House with more planned;
- There is a certificate of lawful development and prior approval, issued by GBC for the proposed installation of solar panels on the Sports Park building. These permit the installation of about 735 kWp (approx. 0.7 MW) of solar generating capacity, scheduled for 2024;
- the 'best case' scenario for scheduled and potential rooftop solar (4.4MWp), would only be only 20% of the 'best case' total for all solar sources;
- The University is currently out to tender for a number of significant solar canopy car park EV charging installations across the estate, the main car park has a site area of 2.6ha (approximately 12% of the 21.7ha required to generate 12.MW from solar energy). Again, it is estimated that such canopies if combined could under a 'best case' scenario contribute around 5MWp, car park canopies again would only contribute around 23% of the solar energy generated under the 'best case' scenario;
- Deliverable capacity from rooftop and car park solar would be approximately 9.4MWp;

11.10.10 The University does not have ownership rights to all of the buildings in Surrey Research Park to be able to install roof mounted solar panels. It can only work with the owners and tenants to achieve this.

11.10.11 Some responses have referred areas of undeveloped green space within the University estate, these provide amenity open space including for recreation

and well being. These spaces are protected by the Development Plan and NPPF, so would not be a suitable alternative.

Location of solar array

- 11.10.12 The solar array is in the setting of the SHNL and is a candidate area, the Little Misley files is in the AGLV. The applicant has carried out an Alternative Sites Assessment, supplemented by the Soil survey for parts of alternative site 8 to explain the rationale for the site selection. The Transport Assessment then sets out the route for the access track and the cable route in the PD&A Statement.
- 11.10.13 These have been assessed above and that alternatives were considered and discounted based on an evidence based approach. It has been acknowledged that whilst third parties do agree with the conclusions made. There is no evidence to suggest that the approach taken is not sound.

Optimising the solar array

- 11.10.14 The panel space on the three fields has been laid out to maximise generation yield / avoid a material reduction in generation yield through shading of panel row to panel row. The most technologically advanced PV panel type would be used, comprising a greater number of smaller cells per panel and with independent top and bottom panel areas for efficiency overall, even when one area of a panel might be temporarily, partially shaded or even 'bifacial' panels which absorb light energy from both sides (direct and reflected) and are therefore capable of generating more solar energy than a traditional mono-facial panel. Details of the specification would be required by condition.
- 11.10.15 Concentrating the panels by reducing the spacing would require more panels to be installed as the overall solar plant would become less efficient. Therefore the space required has been considered and has more than a 50% ground cover ratio (GCR), this exceeds industry practice of 45 GCR.
- 11.10.16 The most optimum orientation for fixed solar panels is south facing to achieve more electricity generation per MWp.
- 11.10.17 A tracking-type system was considered by the applicant early in the design development process and discounted due to the noise and movement into the landscape, as well as significant dynamic glint and glare effects. Given the greater impacts this would have the fixed panels would have less harmful impacts.
- 11.10.18 The fields would also be used for a new wildflower meadow, grazing and to provide greater habitat and biodiversity benefit. The development would also allow the agricultural land to rest and be more productive after the use ends. By maximising the land underneath the panels.
- 11.10.19 The export cable is longer than typically expected due to the distance to the nearest substation at Stag Hill. The loss of power through distribution and export cables would not be a significant factor and does not materially affect the efficiency of the solar facility.

11.10.20 The energy output per hectare of the scheme would be similar or better than existing or proposed schemes by the University. As such, the proposal would still be making efficient use of Green Belt land.

Battery storage

11.10.21 This allows greater scope for self-sufficiency and necessitate less energy being exported to the grid. Battery storage is not currently proposed and the exported energy would still be beneficial in making a contribution to the decarbonisation of the grid.

11.10.22 Para. 4.70-4.71 of the PD&A Statement explains that 'spillage' to the grid is an unavoidable part of energy generation. As matching demand and consumption exactly is near impossible, and spill usually ranges between 25% and 40%. It is anticipated at least 66% of the electricity generated would be consumed by the University.

11.10.23 Although, as the University systems adapt to electrification over time, it is expected that the proportion of energy used by the University would increase and the amount of export to grid would decrease to no more than 15%, by installing with a combination of BESS (battery), TESS (thermal) and electro-boilers. Therefore, more of the electricity generated would be used and is part of a long-term programme to reach net zero and cannot be achieved in a single step.

Other sources of green energy

11.10.24 Third party responses and CPRE Surrey have suggested that the University should source green energy from the grid. The applicant has responses to this in their letter dated 22.10.2024.

11.10.25 The grid is supplied by electricity generated from both renewable energy and fossil fuel sources. The University could subscribe to a green tariff this this would draw on existing renewable sources and may be at a higher cost.

11.10.26 This would not address the matters identified by the University.

Green credits

11.10.27 In response to matters raised by third parties, the applicant confirms that purchasing carbon credits would be prohibitively high and as demand grows the cost for carbon credits is expected to increase further. A reliance upon carbon credits would expose the University to uncertain and unviable costs. Therefore, would not be a long-term solution to meet their net-zero strategy.

Reducing energy demands

11.10.28 Alongside measures to decarbonise their energy needs, the University of Surrey Net-Zero Strategy is focusing on reducing demand, this is a summary of para 4.57- 68 of the PD&A Statement:

- Optimise use of space to match demand – better match the occupied space the need for the activity;
- Intelligent heating, ventilating, and lighting management systems - more intelligent energy controls, to reduce energy waste

- Increased energy efficiency - for example changing fluorescent/tungsten lights to LED lights
- Energy efficient new-built and building upgrades – guided by EPC ratings and BREEAM

11.10.29 The University has a consumption of approximately 28 GWh/yr, and this is expected to increase due to the data centres for the growth of AI and EV charging. Energy efficiency measures and roof mounted solar panels would not enable them to reach their net zero target by 2030.

11.10.30 The applicant has demonstrated that they have looked at all the potential options for an energy strategy to achieve net zero, as doing nothing is not an option to respond to climate change. They have justified the location, size and type of development. By taking an evidence based approach to minimise effects and the proposal represents the outcome of this.

11.11 Other matters

11.11.1 These are matters that have been raised by third parties and have been considered in more detail below:

Electromagnetic Interference (EMI) or Electromagnetic Field (EMF)

11.11.2 There are also no detailed objections from the Council's Environmental Health team regarding the potential impact on human health or other services from the proposal. In terms of electromagnetic fields and compatibility. The applicant explains at para. 2.4.283-292 of their PD&A Statement Addendum that they follow the guideline set by the Distribution Network Operator (DNO), in this case Scottish and Southern Electricity Networks (SSEN).

11.11.3 The export cable would comprise a Copper Triplex HV; cable size - 630sq.mm single core XLPE Cu and cable voltage - 33kV. 2.4.286. The cable trench would be 450mm trench at circa 1050mm depth, this would be a standard cable and trench. No additional concrete or steel walls in trenches are proposed. The cables would be appropriately sheathed and armoured cables are used for the HV (high voltage) supply to the terminal substation on the University campus. These all come with EMI screening as standard.

11.11.4 There is limited evidence that suggests the proposal would cause a risk to health.

Air quality

11.11.5 The Transport Assessment sets out at section 5.4 the vehicle routing and access. This confirms that vehicle access would use the A3, A31 and A331. Therefore, this would not enter Compton village.

11.11.6 Therefore, there would be no greater impact in The Street, Compton Air Quality Management Area (AQMA).

Underground utility services

11.11.7 There are buried steel pipelines in close proximity of the development work, including safeguarding against the corrosion of buried metal pipes, where electromagnetic fields are introduced.

- 11.11.8 The detailed design and pre-construction stage of the works would require site specific discussions. As there are measures to manage the effects of this under other legislation, it is not necessary to require further information or impose conditions.

Embodied carbon and the carbon lifecycle

- 11.11.9 A number of responses have been received in relation to the effects of the proposed development from the works, the solar panels and the whole carbon lifecycle.
- 11.11.10 Policy D14(2) and (3) of the LPDMP provides requirements for sustainable and low impact development, including demonstration of minimisation of embodied carbon. It must be noted that a whole carbon lifecycle assessment is not required by the Development Plan or the NPPF.
- 11.11.11 It is acknowledged that there would be an element of embodied carbon associated with constructing/ decommissioning solar farm and the solar panels themselves. The during the operation phase there would be limited energy consumption.
- 11.11.12 However, the carbon savings associated with solar energy (and reduction in fossil fuel use) has to be balanced against this.

Glint and glare

- 11.11.13 The impacts of glint and glare from the solar array have been assessed above in terms of residential amenity, however, it is also necessary to consider the impact on operation land. In this case the railway line to the north of Backside Common and Wildfields Farm. As set out in para. 013 (Reference ID: 5-013-20150327) of the PPG which sets out a range of factors for “the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.”
- 11.11.14 The applicant has submitted a Solar Photovoltaic Glint and Glare Study (March 2024). This states that solar reflections would be possible towards all five identified train driver receptors, equivalent to 0.4km section of railway track to the east approaching/ leaving the section passing the Surrey Research Park. The existing vegetation in two triangular woodland areas to the east of Wildfields Farm has been predicted to fully remove views of the reflective area. Therefore, no impact is predicted, and no mitigation is required. Therefore, there would not be any significant effects to the railway line.
- 11.11.15 The study has also measured the intensity of reflections from solar panels to other receptors including roads, dwellings, PROWs and the SHNL. This has found no predicted impact and therefore no mitigation has been proposed. There is no evidence to contravene these findings. In addition to this, the applicant has agreed to a condition requiring minimising reflectivity in the PD&A Statement Addendum, as suggest by HDA.

Crime reduction

- 11.11.16 The fencing would comprise wooden posts with wire mesh, rather than metal palisade fencing. This is because of the rural location so that it would not appear obtrusive when seen from PROWs and from wider views, as well as complement the biodiversity strategy including allowing movement for badgers and other species. Therefore the approach taken by the applicant is supported, however, opportunity for additional securing measures in accordance with Secure by Design guidance would be suitable in accordance with policy D1 of the LPDMP.
- 11.11.17 In addition to this, there would be CCTV for site monitoring, where it would be possible to implement artificial intelligence (AI) technology, as is becoming commonplace even for domestic security devices. The applicant has a vested interest to protect their equipment and asset and therefore, the measure proposed are satisfactory.

Site waste management

- 11.11.18 Policy 4 of the SWLP, policy D2(1)(b),(2) of the LPSS and Policy D12(4) of the LPDMP recognise that demolition and engineering works involve materials to be imported or exported from the site. A Site Waste Management Plan (SWMP) must demonstrate that waste will be managed efficiently in order to facilitate material reclamation and reuse and, where reuse is not possible, recycling and composting, in order to divert as much material as possible from landfill, in accordance with the waste hierarchy.
- 11.11.19 The applicant has submitted a pre-construction SWMP. The works would involve waste soil from excavation and to cut through a soil heap. As this cannot be used onsite, it would be sent for reuse offsite. The soil would be checked for any contaminants and managed accordingly. Then removed from the site. Further details would be required and a SWMP would be secured by condition.
- 11.11.20 As this is a temporary development the solar panels and associated infrastructure would be removed and disposed of. The applicant sets out in their Sustainability Statement that they would be recycled, in most instances and re-use where possible. To ensure that this would be done in accordance with the requirements at the end of the lifetime of the development, a condition would be appropriate.

Wildfires

- 11.11.21 Policy D15(5) of the LPDMP requires management of fire risk in areas at a high risk of wildfire. The applicant has agreed to include the Forestry Commission's "Building wildfire resilience into forest management planning" (including "Wildfire risk assessment template for forests and woodlands") within its overall fire engineering risk assessment and strategy process.
- 11.11.22 It would be appropriate to require a wildfire risk assessment to identify potential risks and ways to manage these.
- 11.11.23 The above demonstrates that the applicant has explored all the alternative options and doing nothing is not a suitable response, given the consequences to the University from not having energy and financial security. This responds

to matters raised by officers, third parties, amenity groups and consultees. Therefore, all other options have been exhausted and the justification for the proposed development as submitted has been provided.

11.12 Public benefits and Very special circumstances

11.12.1 In this case there is crossover between the public benefits that need to be identified under para. 208 of the NPPF and the very special circumstance required under para. 153, so these shall be reviewed together and then weighted. The NPPF states at para. 156 states that “very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.” This is consistent with policy D17 of the LPDMP which sets out the matters which shall be considered when weighing up the potential benefits of such proposed development, this shall be assessed in the first instance.

11.12.2 Then following the golden thread in the NPPF for sustainable development, the three overarching objectives of: economic, social and environmental matters shall be considered in turn, this is also explored in the para. 5.250 of the text accompanying policy D17, which sets potential environmental, economic and community benefits.

Contribution to the accepted national need for renewable energy

11.12.3 The proposal would have a 12.21MW generating capacity representing 0.017% of the government’s target of a further 70GW of solar capacity by 2035. Given that Surrey enjoys strong solar irradiance, it is not unreasonable for the county to be expected to host large amounts of future solar photovoltaic arrays to meet the net zero strategy for the county and the country.

11.12.4 Policy D17 of the LPDMP does not identify targets or sites for the implementation of renewable energy. However, at para. 5.243 is supportive of standalone energy installations, as rooftop solar and domestic scale low carbon energy schemes are unlikely to be sufficient alone to achieve the Council’s ambition is for the borough to become net zero carbon by 2030. Surrey’s Greener futures climate change delivery plan states that Surrey needs to contribute to the decarbonisation and management of the electricity grid by increasing the capacity of renewable energy by 1244 megawatt (MW) of low carbon electricity through the installation of about 6.2 million solar panels and other forms of renewable energy. There is no local monitoring data for solar photovoltaic development.

11.12.5 It is agreed that alternative suitable locations are likely and that opportunities undoubtedly exist with high levels of solar irradiation outside the AGLV and candidate areas of the SHNL or within its less sensitive parts. However, these would not be in proximity of the primary substation at Stag Hill to serve the energy needs of the University with capacity to accept generation. There is a constrained grid, so capacity should be used wherever possible. This would ensure that the scheme would make an early and significant contribution to the objective of achieving the Net Zero Strategy for the University and supporting the decarbonisation of the grid. Accordingly, the clean and secure energy benefits on offer attract substantial overarching weight. Furthermore, the megawattage available at this point of connection would not justify the cost of a connection to a site outside of the candidate SHNL area and AGLV;

so there is no need for viability evidence to demonstrate that any site making use of this point of connection would be limited to a radius of 3km.

- 11.12.6 National Policy Statement (NPS) EN-1 and EN-3, enhance the need for the stated types of major energy infrastructure and urgency given to the delivery of that infrastructure. Substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008 (EN-1, para. 3.2.7). The government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure (para. 4.2.4), and that low carbon infrastructure for the purposes of this policy means for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (para. 4.2.5 bullet point 1). Whilst this is not a major energy project over 50MW, the position outlined above offers substantial weight in favour of even smaller solar farms such the application scheme.
- 11.12.7 Para. 163 (b) of the NPPF states that an application for renewable or low carbon development should be approved if its impacts are (or can be made) acceptable. In this case harm has been identified to the setting of the SHNL, candidate site for the SHNL, AGLV, a designated heritage asset and the Green Belt from inappropriate development. The applicant has provided a range of measures to minimise the harm where possible and then suitable mitigation. The NPPF's position on renewable energy at para. 163 favours the proposal.
- 11.12.8 Overall, the need for renewable energy generation could not be met in other ways (given the detailed assessment of alternatives assessed above), that the proposal would make an essential contribution both to the accepted national need for renewable energy and to Guildford and Surrey's need and that the cost of, and scope for meeting the need for it in some other way would be prohibitive in the short to medium term. The scale of the proposal would represent a significant contribution (up to 56%) towards energy needs of the University from a renewable source and is predicted to deliver a saving of 1,122,000 kg CO₂e of emissions annually. These positive contributions need to be balanced against the harms identified. The need for renewal energy generation could not be met in other ways, and that the cost of, and scope for meeting the need for it in some other way, would be prohibitive in the short to medium term. Any detrimental effect on the environment, and the landscape have been considered and as far as possible have been moderated. Therefore, this is given **substantial weight**.

Economic

- 11.12.9 The University will have access to cheaper, clean energy that has been locally produced. This would reduce the expenditure on energy, which has increased from £4 million in 2020/21 to £17 million in 2023/24 and taking up a larger proportion of their budget. This money could then be invested into other projects to maintain its world-class research, development, and teaching activities and the electrification of systems (electric heating, EVs etc), and specifically the need for data storage centres. As well as, improving the financial security of a large and important employer and institution in the local economy (£1.1 billion gross value added and 14,500 jobs in the Borough of Guildford, see para 1.1.2-8 and 2.4.21-34 of the PD&A Statement Addendum). This is given **significant weight**.

- 11.12.10 Economic benefits arising from construction/ decommissioning activities and to the supply chain are matters to be considered. However, as this would not be a solely local workforce or suppliers and would be for a limited time period, also there would be some loss of agricultural jobs. This is given **limited weight**.
- 11.12.11 Once operation there would be employment electrical and land maintenance contractors. Due to the frequency of required visits (once a month) and the extent of maintenance required, this is afforded **limited weight**.

Social

- 11.12.12 The proposed solar facility would make a significant contribution to meeting the corporate objectives and net zero targets of both Guildford Borough Council and Surrey County Council, assisting the community to meet its aims to address climate change and reduce carbon emissions. This is afforded **substantial weight**.
- 11.12.13 The excess energy (34% zero carbon electricity) provided to the grid would contribute to decarbonisation and give more homes and businesses access to green energy. This is afforded **substantial weight**.
- 11.12.14 The application would provide interpretative information so that the local community and visitors walking through the wider site would have access to material to broaden their understanding off the local landscape in terms of its built environment, heritage assets and natural features. This is not a requirement as the site is not in the SHNL. However, as this has been provided voluntarily by the applicant and would be an investment in the local community, this shall be afforded **moderate weight**.
- 11.12.15 The University as a responsible employer and organisation is interwoven into the local community. The scheme would provide a visible embodiment of their net zero strategy and would give energy security to the staff and students living and working on the campus. This is given **limited weight**.

Environmental

- 11.12.16 The principal benefit of the scheme would be derived from the wider environmental benefits associated with increased production of energy from renewable sources. That benefit like other benefits, and indeed the impacts of the scheme, are temporary over the (35 year) operational duration of the proposals and will mostly cease after decommissioning. Other benefits arise from the biodiversity net gain some of which, as described in detail below, is temporary and some of which is likely to be permanent.
- 11.12.17 Biodiversity Net Gain (BNG) would be maximised and deliver 23.79% for habitat units, 48.88% for hedgerow units, and 34.71% for watercourse units, exceeding both local and national requirements. Ensuring that the site would not experience biodiversity decline. Whilst this is a requirement by legislation and the Development Plan, given the percentage increases, this is given **significant weight**.
- 11.12.18 The proposal would be a response to climate change mitigation and given the judgement in *Finch* would also reduce indirect greenhouse gas emission. This is afforded **significant weight**.

- 11.12.19 The landscape strategy has been developed to be sensitive to the landscape qualities including the topography, PROWs and setting of the SHNL. This would minimise the visual impacts. This is given **moderate weight**.
- 11.12.20 Ecological mitigation is required to manage the effects of the development on habitats and animal species. This is a requirement of development so is given **neutral weight**. The enhancements are also required however, the approach taken creates new habitats, increases biodiversity and allows for an integrated ecosystem. So, this is given **moderate weight**.
- 11.12.21 This would be a temporary use, therefore the harm to the openness and of the Green Belt would not be permanent and the land could be restored at the end of its use, some of the benefits would also be reversed. As this would be a use of 35 years, this is afforded **limited weight**.
- 11.12.22 The soil in on the three fields would be rested, allowing for soil restoration and the temporary cessation of fertiliser being used. Whilst the soil could become more productive after the use reverses back to agricultural, there would be a period of more than 35 years that the land would not be in use for food production. Therefore balancing these together this is given **limited weight**.
- 11.12.23 The Flood Risk Assessment information evidenced confirms that the risk of fluvial flooding to the site is low and the development would not increase the risk of flooding off site. Nevertheless, the design of the scheme through the use of appropriate conditions on the detailed drainage design would incorporate SuDS drainage features, to provide further increased flood risk resilience and overall natural habitat betterments integrated with other expected landscaping provisions. As this is a requirement of the Development Plan and the NPPF, this is afforded **neutral weight**.
- 11.12.24 A number of public benefits and very special circumstances have been identified and weighted accordingly.

11.13 Heritage balance

- 11.13.1 Due regard must be had to the harm that has been identified to the listed building under Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990. In these circumstances there is a presumption against granting planning permission. This statutory duty carries great weight.
- 11.13.2 Para. 205 of the NPPF makes clear that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation. In this case Wildfields Farm is a Grade II listed farmhouse, this shall be given due regard in terms of weighing.
- 11.13.3 Less than substantial harm to the significance of a designated heritage asset has been identified to the **lower end** of the spectrum.
- 11.13.4 This gives rise to a statutory presumption against granting planning permission for development which would cause harm to the settings and significance of listed buildings. 'Less than substantial harm' to a listed building should not be equated with a 'less than substantial objection'. Any balancing exercise cannot ignore the overarching statutory duty imposed by section 66(1).

- 11.13.5 Wildfields Farm is a locally important heritage asset, relatively speaking there is a lower value associated with its significance. Therefore, the relative harm is given lesser weighting and consequently the benefits to outweigh this harm go not have to be as great.
- 11.13.6 The public benefits align with the some of the very special circumstances and have been outlined above and duly weighted. These would outweigh the heritage harm that arises from the proposed development. The balance that the evidence demonstrates is that the level of harm has been minimised to deliver the solar farm in accordance with para. 201 of the NPPF and policy D18(1)(d) of the LPDMP.
- 11.13.7 Policy D18(1)(e) of the LPDMP requires “a justification for the proposals that explains why any resultant harm is considered to be necessary or desirable.” The harm is necessary to provide the access track to service the solar arrays and the solar arrays are required to meet the energy needs and net zero strategy of the University through renewable energy which has a number of wider public benefits including to the national government objectives.
- 11.13.8 Therefore, the public benefits would outweigh the less than substantial harm identified. In accordance with policy D3 of the LPSS, policies D18 and D19 of the LPDMP and para. 208 of the NPPF.

11.14 Planning Balance and overall conclusions

- 11.14.1 Firstly, by virtue of the inappropriate development of the solar arrays on the fields and harm to the openness from the access track on the Green Belt there would be conflict with policy P2. Secondly, due to the harm to the landscape qualities of the AGLV and setting of the existing SHNL caused by the solar array on Little Mисley there would be conflict with policy P1(3) and (5) of the LPSS and partial conflict with P1(1) due to the limited weight afford to this policy form the site being a candidate area. Thirdly, The temporary loss of 6.5 ha of BMV (35% of the application site) would be contrary to E5(3) of the LPSS. Fourthly, the proximity of Wildfields Farmhouse to the proposed solar array on the Wildfields field and the access track spur would result in less than substantial harm at the **lower end** of spectrum to the setting of this designated heritage asset. This would be contrary to policy D3 of the LPSS and policies D18(3) and D19(1) and (2)(d) of the LPDMP.
- 11.14.2 Weighing against the proposal is harm to the Green Belt by appropriateness which carries **moderate** weight, as the scheme is temporary and reversible (albeit over a generational time span of 35 years). The harm to the setting of the SHNL, candidate site for the SHNL and AGLV carries **significant** weight and the temporary reduction in agricultural productivity carries **limited** weight. The harm identified to the setting of the Grade II listed Wildfields farmhouse is afforded **significant** weight.
- 11.14.3 Weighing in favour of the proposal is the development’s renewable energy production and decarbonisation of the grid and reduction in indirect greenhouse gas emissions, which carries **substantial-significant** weight and the economic benefits to the University and its role in the local economy and BNG carries **significant** weight. The proposed interpretive information, landscape strategy including legacy planting and ecological enhancements would have **moderate** weight. There would also be a number of outcomes

and that would have **limited** weight in terms of employment, community, reversibility and soil restoration.

- 11.14.4 The cumulative benefits from the scheme on offer, in particular, the clean and secure renewable energy generation, would constitute very special circumstances. Such justifications clearly outweigh the moderate Green Belt harm arising.
- 11.14.5 It has already been established in the heritage balance required under para. 208 of the NPPF that the public benefits identified would outweigh the harm to the Grade II listed farmhouse.
- 11.14.6 As directed by para. 208 of the NPPF, it is necessary to assess the harm to the designated heritage asset in relation to any public benefits on offer. Significant weight to the less than substantial harm arising to the designated asset of Wildfields Farmhouse. However, there would be significant benefits from the scheme encouraged by other elements of the development plan and the content of the NPPF. Overall, the public benefits, in this case, outweigh the less than substantial harm to the settings of designated heritage assets.
- 11.14.7 Given the national targets for a transition towards a low carbon future, the importance attached to the objective by the Council in declaring a climate emergency, the clear support given to renewable energy development by the government and in the NPPF, the support for renewable energy within the Development Plan. It is evident that the proposal would provide an important environmental benefit. There would also be additional benefits from the economic benefits to University, local economy from energy and financial security and the BNG requirements being exceeded. The impact on the openness of the Green Belt and the effect on the landscape would be minimised and mitigated, there would not be a cumulative impact as other solar panels would be mounted on rooftops at the University. The environmental, social and economic benefits would significantly outweigh the harm to the Green Belt, the impact on the landscape, loss of BMV land and less than substantial harm to the designated heritage asset at Wildfields Farmhouse. Subject to the recommended conditions, there would be no harm in respect of any of the other issues.
- 11.14.8 Overall, this recommendation is made on the total level of harms arising against any overall benefits attributed to the proposals. Having regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, there would be some conflict with policies in the LPSS and LPDMP. However, the benefits of the proposal are material considerations which outweigh the conflict with the development plan and all harms that have been identified. Subsequently the direct benefits arising from the development would support the grant of planning permission.

12.0 Conclusion:

- 12.1 The proposals would deliver a solar farm that would generate up to 12.21MW of green, renewable energy, which would be used by the University as part of their net zero strategy as well as providing them with energy and financial security for the future, This would have wider public benefits in decarbonising the energy sources to the National Grid and reducing greenhouse gas emission.

- 12.2 The applicant has explored all the alternative approaches to address the University's current and future energy needs, through an evidenced based approach to justify the proposed development for the location, size and type of solar array.
- 12.3 The access track and cabling would facilitate the development proposed works are due to the limited vehicular access to the fields and location of the substation at Stag Hill. The route, methodology and appearance has been designed to be sensitive to the local environment and designations.
- 12.4 The proposals have taken a proactive and sympathetic approach to minimise harm and where this is not possible provide suitable mitigation including the landscape strategy.
- 12.5 It is acknowledged that there would be harm to the Green Belt, the landscape qualities, agricultural land and a heritage asset. However, the benefits are numerous and cumulatively outweigh the harm identified.
- 12.6 Overall, the scheme represents a sustainable form of development, that complies with the Development Plan and both local and national policy requirements and strategies to support renewable energy projects.