

**Branch – Berkeley Vale District**

**Planning Application Reference S.18/0537/FUL**

**Construction of a solar park, to include the installation of solar photovoltaic panels to generate approximately 25MW of electricity with DNO and Client substations, inverters, perimeter stock fencing, access tracks and CCTV. Landscaping and other associated works, together with retention and extension of existing hedgerow (377639-212224) Land to the East of High Green Longney, Gloucester.**

**Introduction**

This statement sets out in detail the reasons for CPRE's formal objection to the proposed development and also makes comments in relation to the shortcomings of the proposal.

While CPRE supports the use of alternative means to fossil fuels to produce electricity, including PV solar panel arrays, it is opposed to the unwarranted urbanisation of the rural landscape and the loss of the nation's farmland for food production. Instead, CPRE's preference is for the use of brownfield land and use of existing buildings for siting PV solar panels. We note that despite advice in updated Planning Practice Guidance dated 28 March 2015, paragraph 013 the applicants have submitted no evidence that they have fully investigated alternative sites on previously developed and non-agricultural land. They seem to rely on the premise that as they consider the land quality to not be the most versatile i.e. below Grade 3A, that it is acceptable. From site inspection it appears to nevertheless be productive with evidence of healthy crops of winter wheat on some of the fields which doesn't imply that the land is poor quality.

In terms of the provision of solar farms we draw attention to DECC's UK PV Strategy Part 2 document which states:

"While large scale solar farms provide opportunities for greater generation, they can have a negative impact on the rural environment if not well planned and well screened. There can also be problems where local communities see no benefit but consider that they bear amenity issues. The Solar Trade Association has developed a statement of "10 Commitments" for solar farm developers which seeks to ensure that the impact of large-scale solar farms on communities, visual impact and long term land use are minimised....."

In April 2013, the Rt. Hon. Gregory Barker, Minister of State, Department of Energy and Climate Change, in a speech to the Large Scale Solar Conference, expressed his views over some of these matters and, in his 1<sup>st</sup> November 2013 letter to all planning authorities, he restated his concerns over permitting large scale solar arrays on farm land which do not appear to take full account of the latest planning guidance. In his letter he stated:

"Our new Solar Roadmap makes it very clear that new solar installations need to be sensitively placed and sets out four guiding principles, which form the basis of the Government's strategy for solar PV. This includes the principle that: "Support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental

considerations such as **landscape and visual impact, heritage and local amenity**, and provide opportunities for local communities to influence decisions that affect them”.

A written ministerial statement was made on 25 March 2015 by Eric Pickles the then Secretary of State for Communities and Local Government stressing that in implementing its solar photovoltaic strategy that future growth of such technology should be focussed on domestic and commercial roof space and previously developed land. The statement also outlined the strong protections in the NPPF for the natural and historic environment and that proposals involving agricultural land should be justified as being necessary **and** using poor quality land in preference to land of higher quality.

It should also be noted that renewable energy generation stands only third in the energy hierarchy, after energy saving and energy efficiency.

#### **Comments on the details of the application and the Planning Design and Access Statement**

The statement confirms the large scale nature of the proposed solar farm encompassing 47.67ha (117 acres) of grade 3B agricultural land currently in arable use and divided into 9 fields of various shapes and sizes. The size of such a scheme would be equivalent to 60 football pitches being laid out in open countryside. The proposal represents a major application for what is in essence a power station located in open countryside. It appears that the District Council have screened the proposal and consider it not to require an EIA which is surprising bearing in mind the size and nature of the development and it clearly falling within schedule 2 of the regulations although the acknowledgement letter to the applicant states otherwise. It is also surprising that no pre application discussions have taken place with the LPA according to the application form.

The statement confirms that a new access is considered necessary with resultant loss of boundary hedging to allow for splays of 160m x 2.4m. The south western part of the site is confirmed as being in flood zones 2/3. Hedges and trees and PROWS are confirmed as existing and crossing the site and would largely be retained. The land drops from north to south west from 20m to 8m and it is proposed to place the solar arrays in rows across the fields running west – east and rising to a height of 3m above ground level. **The number of panels and design is not specified.** Security/deer fencing is proposed around the development 2.4m high. Associated plant buildings and security cameras are shown as being 3m high but no paint finishes are indicated. New 3.5m wide stone tracks are also proposed across the site.

It is proposed that the land would have a dual agricultural/ energy generating use with sheep being able to graze under the panels. The practicalities of shepherding with sheep hiding under panels make this option unlikely particularly if wild flowers are planted. A 30 year life is intended with potential reinstatement at the end of the period although there is obvious potential to reapply to repower and continue the use. The proposal is intended to generate 25MW of power when in operation which could supply up to 7,500 homes. A one – way traffic system would minimize disruption during the 4 month construction period. The reservations of the highway authority are noted in this regard and as to the acceptability of the access arrangements where longer visibility splays of 215m are required. Can these be achieved on land in the applicant’s control?

The applicants consider the proposal would result in minimal physical intrusion that landscaping works would aid in moderate mitigation and there would be no significant visual and landscape impacts and overall with the mitigation the effects will be benign. **CPRE largely disagree with this conclusion for reasons explained below.**

In summary, we consider that this document does not justify the proposed development.

### **Landscape Assessment**

The assessment follows the conventional format of downplaying the impact of the development and emphasising the proposed mitigation.

In paragraph 3.21 it refers to the sense of openness of the surrounding landscape which CPRE would not disagree with but then claims in paragraph 5.17 that the proposal would have a minimal effect on the character of the local landscape.

In paragraph 5.19 it considers that long distance views are limited. **CPRE disagrees in that clear views of the site can be obtained from high ground to the east particularly from Haresfield Beacon, the Cotswold Way long distance footpath and from high ground in the Forest of Dean to the west. Such views are not considered to be limited and require proper analysis.**

The applicant considers that the proposal would reflect the Councils' landscape assessment that defines the physical characteristics of the Severn Vale Hillocks and Lowland Plain landscape character areas. The characteristic hedgerows in their present form will not be adequate to hide from sight a solar array of the magnitude proposed. Paragraph 6.8 claims the scheme will be moderately beneficial owing to new planting and retention of existing hedgerows and under paragraph 7.34 will result in a minor adverse impact with the landscaping for the duration of the scheme but under paragraph 7.37 high adverse to start with ranging to medium adverse after 15-20 years in relation to landscape character at the south western part of the site owing to the rising ground. However during the period from late autumn to mid-spring, when they are lacking their leaves, it is unlikely any deciduous hedging will provide much in the way of camouflage.

**CPRE consider the alien industrial nature of the proposal and the large site area evidenced from surrounding roads, footpaths and nearby properties would result in significant adverse change to the landscape over a long period of time changing it from pleasant green fields to a grey mass of glass and associated infrastructure.**

### **Visual Amenity Assessment**

The site comprises rising ground near to a significant bend in the Severn estuary. Although neither bank of the river is covered by any national landscape designation, we consider the area to offer some of the most striking views in Gloucestershire. In this context, we consider the letter of 27 March 2015 from the Minister of State for Housing and Planning to the Chief Executive of the Planning Inspectorate to apply with particular force.

*This begins "I have become aware of several recent appeal cases in which harm to landscape character has been an important consideration in the appeal being dismissed. These cases are a reminder of one of the twelve core principles at paragraph 17 of the National Planning Policy Framework – that plans and decisions should take into account the different roles and*

*character of different areas, and recognise the intrinsic character and beauty of the countryside – to ensure that development is suitable for the local context”.*

The sources of long distance views have been outlined above and CPRE disagree with the applicant's assertion in paragraph 8.2 that there would be a minor impact from the Cotswold escarpment. In fact an objector has indicated the impact by use of a photograph taken from Haresfield Beacon which shows a cumulative impact with new development around the M5 motorway corridor. Although photographic views 1,3,4,5 and 7 are helpful there are other viewpoints from the south, west and north that would be equally useful in assessing impact as well as more distant views from the west and east as explained above. The photographs attached show the extent of the proposal and the clear impact on the adjoining area.

CPRE agree with the applicant in paragraphs 8.5 and 8.25 that there would be views of the site from neighbouring residential properties to the north, west and east particularly from high level windows and the sensitivity would be medium to high. Paragraph 8.25: There would also be views from Hardwicke Road (a national cycle route), Castle Lane and the public footpaths surrounding the site and crossing it. CPRE disagree with the applicant that sensitivity to footpath users would be medium to high considering it would be high even with planting which to screen the panels would need to grow over 3m creating a corridor affect compared to the existing open views across fields and the open landscape beyond. The impact would certainly be major to adverse at first as outlined in paragraph 8.20.

CPRE totally disagree with the applicants that the long-term effects would be negligible to minor adverse Para 8.37. This relies heavily on the effectiveness of the proposed landscaping and management regime which if successful could have other implications for footpath users. An objector has also raised concerns over the effectiveness of planting along the south western boundary owing to the waterlogged nature of the ground.

CPRE also disagree with the applicant that the proposal would only have a localised impact on visual amenity that can be mitigated and compensated for (Para 11.4). There would still be views from high ground to the west and east that would look over any planting.

### **Ecology and Arboriculture**

The reports stress enhancements that could take place if the scheme went ahead. From observation the existing trees and hedges are generally well maintained and contribute to the landscape character. This character would be overwhelmed by the enormity of the development with its industrial and engineered character. A claimed benefit will be the provision of wild flowers growing around and under the rows of solar panels.

In CPRE's opinion none of these alleged benefits will arise without a substantial amount of work before the panels are installed, and maintenance during the operational period. Wildflower meadows need to be maintained (principally by mowing), not left alone, and maintenance of any kind is likely to be difficult and expensive once the panels are in place. We consider it probable that without such maintenance the fields will be overrun by plants such dock, nettle, ragwort and bramble, leading to none of the claimed benefits and adding to the difficulties of restoring the land to agriculture after deconstruction. Grazing of such meadows would also be incompatible.

### **Heritage Report**

CPRE notes and supports the response from the County Archaeologist requesting a field evaluation prior to consideration.

### **Flood Risk Report**

The concerns of the Flood Authority should be addressed regarding effects on surface water drainage particularly as the land classification of 3B is based on the ground holding water.

### **Traffic Report**

CPRE notes the content of the traffic report and the concerns raised by the County Highways Department that need to be addressed. The visual impact of any necessary highway works and visibility splays are of particular concern to CPRE particularly the loss of the mature hedge along the road frontage. Any replacement will take at least 5-10 years to have any lasting effect and there would be loss of habitat during and following such works.

### **National Planning Guidance and Policy**

The NPPF emphasises strongly at the outset the importance of the development plan in the determination of planning applications, at paragraph 2 and again at paragraph 11.

We deal with the three dimensions of sustainable development and other overarching guidance in the NPPF in the section below headed The Planning Balance.

Turning to Section 10 of the NPPF, paragraphs 93 to 96 mainly relate to energy saving or generation elements of development generally, not developments like this one whose sole or principal purpose is to generate energy.

In respect of paragraph 97, we consider that the Stroud District Plan does comply with the first two bullet points. The third bullet point only requires local planning authorities to “consider” identifying suitable areas for renewable and low carbon energy.

In respect of the fourth bullet point, it is noted that the scheme is not being promoted as a community led initiative.

We note the permissive stance on planning applications set out in the second bullet point of paragraph 98. However, this is subject to the very important qualification of footnote 18, and is addressed in detail in The Planning Balance.

The provisions of paragraphs 100 to 104 relating to flood risk are noted. The south western part of the site is within flood zone 2/3 and it is noted that no physical development is proposed in this area. The applicants are however proposing the provision of a new woodland buffer in this area and a wild flower meadow. The poor growth of a recent tree planting scheme near to this boundary illustrate the challenging nature of tree planting in the flood plain and its potential ineffectiveness.

It is noted that the Local Flood Authority is objecting to the proposal on the basis of lack of information.

The sensitive nature of the area within the Severn Vale and the undulating nature of the site that is criss crossed by public footpaths and with mature hedging and trees gives the site considerable value in landscape terms and CPRE consider that paragraph 109 would therefore apply.

## National Planning Practice Guidance

The modifications to the Guidance in March 2015 of paragraph 013 are factors that need to be taken into account in the determination of the application. The guidance cautions that **the deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes.**

9 bullet points indicating factors that need to be taken into account are outlined:

**Focussing large scale development on previously developed and non-agricultural land.**  
*Discussed above and below.*

### Greenfield Land

- i) Use of agricultural land. *Discussed above*
- ii) Continued agricultural use and biodiversity. It is suggested that sheep could graze around the panels and biodiversity could be improved. **No evidence has been submitted as to the suitability of sheep grazing and the practical difficulties of shepherding. Sheep grazing does not appear to be characteristic of the area nor compatible with flower meadows.**

**Temporary Use.** The application refers to a lifespan of 30 years which is significantly longer than the normal 25 years. I.e. 20% more. **This is certainly not temporary in terms of impact and is presumably intended to compensate for the lack of subsidies. The exit from the EU will allow for reductions in current tariffs applicable to the import of panels into EU countries which would similarly compensate. Owing to the fairly recent phenomenon of solar farms there is little evidence yet of the effectiveness of decommissioning. There is a strong likelihood that before the expiry of the 30 years an application would be submitted for repowering and permanent retention of the land use.**

**Visual impact etc.** *Discussed above.*

**Additional impacts.** N/A.

**Impact of security measures.** *See above.*

**Impact on Heritage Assets.** The impact on designated heritage assets and the Gloucester Sharpness canal appears to be low however the County Archaeologist has asked for a field evaluation to be carried out to assess any possible Roman remains present on the site. CPRE would like to be informed of the outcome of such investigations.

**Mitigation.** The applicants have put forward landscaping proposals to soften the landscape and visual impact of the proposals. Normally a scheme should stand on its merits in relation to being sited sensitively to utilise existing physical and natural features to minimise its impact with landscaping only provided to enhance and safeguard such features. A scheme largely reliant on landscaping to justify its acceptability needs to be judged carefully. The applicants have outlined the likely effectiveness of such mitigation which can range from 5-10 years for hedging and 15-20 years for trees/woodland to have any effectiveness. Reservations in relation to the ground conditions where the proposed tree buffer is proposed are outlined above. The rising topography of the land particularly at the south western corner, the low nature of some of the existing hedges, many being barely 2m high and the effectiveness of management are genuine concerns. The proposed panels are

proposed at 3m high which is above many of the existing hedges by a factor of 50%. CPRE accordingly have significant concerns over the effectiveness and challenges of the mitigation proposed in terms of making the proposal acceptable in landscape and visual amenity terms.

**Energy generating potential.** CPRE do not have an issue with the potential of the south facing site to generate low carbon energy albeit on a fairly small scale in relation to the large site area (47.67ha).

The guidance also refers to methods for assessing cumulative impact on similar grounds as those for considering wind turbines. CPRE agree that the cumulative impact of the scheme with other permitted schemes nearby notably at Stantway in the Forest of Dean is insignificant however when viewed from Haresfield Beacon to the east and from viewpoints near Cinderford and Littledean in the Forest of Dean it would clearly further erode the agricultural character of the Severn Vale which has already been severely degraded by the new Javelin Park Incinerator currently under construction and the other nearby commercial developments including light coloured warehousing and a garden centre as well as open storage uses and the M5 motorway itself.

### **Stroud District Plan**

This plan produced in 2015 has been the only component of the development plan since the regional and county elements of it fell away in 2013.

The primary policy of relevance to the proposal is policy ES2 relating to renewable and low carbon energy. Although encouraging the generation of renewable energy it does have a number of caveats including evidence that the installation being provided **would not have significant adverse impact.**

It is noted that the applicants have attempted to address the need for such evidence in the various reports submitted. CPRE are not convinced however that the various reports address the various issues adequately. No photo montages have been submitted to properly assess the landscape and visual impact from pertinent viewpoints and from the public footpaths both currently and with proposed mitigation. The viewpoint locations selected by the applicants notably 1,3,4,5 and 7 are particularly helpful in identifying the site area, its physical features and topography but unfortunately even more potentially helpful viewpoints from the western end of footpath EMV/1 where it joins ELY28; from the road looking into the proposed entrance and along and from footpath ELY/26; views along footpath ELY24 and from the Hardwicke road east of Clarke's Farm looking into the north of the site are lacking and would considerably aid proper site assessment. Views from Haresfield Beacon and other viewpoints to the northeast and west would also be helpful. From the limited information available and from site inspection, CPRE considers that the proposal would have a significant adverse impact on the local area in terms of its alien and industrial character when compared to the existing green fields and such impact would clearly be felt by local road and footpath users and local residents. It would also have a wider impact from public viewpoints to the east and west further degrading existing views.

In terms of the five factors to be considered under the policy CPRE would comment as follows:

- 1) **Impact.** Not clearly demonstrated by the applicants. Reservations raised by consultees on drainage and historic features not yet addressed.
- 2) **Suitable Design.** Not clearly demonstrated-lack of montages.
- 3) **Effect on residents.** Adverse impacts on visual amenity clearly evident both from outlook from nearby dwellings and from road and footpath users. A number of objections have so far been received demonstrating such concerns amongst others.
- 4) **Benefits to area.** Only limited biodiversity and economic benefits. Energy benefits not specific to local area.
- 5) **Avoidance of high quality agricultural land.** Demonstrated by soil surveys however land still appears to be supporting healthy arable crops.

Claimed to be a temporary use but with a 30 year design life could be repowered and become permanent. Little experience nationally of successful reinstatement of such schemes exists. What happens if the owners become insolvent?

In terms of the requirements of paragraph 6.19 of the supporting text CPRE note that the applicants are particularly vague in relation to what reasonable alternative locations have been considered and clearly haven't followed ministerial and national practice guidance.

**CPRE consider that the overall scheme currently presented fails to comply with this policy.**

The other District Plan policy of relevance is ES7 relating to Landscape Character. Other than the special considerations relating to the Cotswolds it requires development in all locations to conserve or enhance the special features and diversity of the different landscape character types found within the district. Priority will be given to the protection of the quality and diversity of the landscape character. Development will only be permitted if all the following criteria are met:

- 1) The location, materials, scale and use are sympathetic and complement the landscape character. CPRE notes that the site is within the Severn Vale Hillocks and Lowland Plain landscape character types as identified in the Stroud District Landscape Assessment 2000. This assessment on page A8 refers specifically to the influence of the River Severn from elevated viewpoints. On page In B30 it refers to the Lowland Plain as being characterised by a strong rectilinear pattern of small to medium sized fields with open views and significant woodland being uncommon. On page B35 it refers to such areas as **being susceptible to inappropriate development**. In terms of the Hillock landscape it refers to the well-defined network of woodland and field boundaries and balance of woodland, pasture and arable land being strong features. It highlights the need for strict planning control in such areas. **CPRE consider that the proposal would not reflect these landscape attributes and agricultural character owing to the significant scale and alien nature of the proposal in terms of materials, massing, layout and engineered appearance that would essentially submerge the existing field pattern and owing to low hedging and the undulating nature of the site would be completely dominant and in unnatural in landscape terms compared to the existing largely green agricultural character.**
- 2) That natural features including trees and hedgerows and water features that contribute to the landscape character and setting of the development should be



retained and managed appropriately in the future. **CPRE notes that the applicants accept that sections of hedgerows and removal of some trees will have to take place to enable the development to proceed. The removal of the front boundary hedge to the Hardwicke Road will have a significant impact on the rural character of this road with over 200m having to be removed to satisfy road safety requirements. The road is well used both by motorists and cyclists and is part of the national cycle route linking Bristol with Stratford-on-Avon being number 41. Being close to the Gloucester fringes where further residential development is taking place greater use of this road is likely particularly by leisure users. The effectiveness of future landscape management is always a concern particularly with mechanical cutting being the norm.**

**CPRE object to the development owing to its conflict with this policy requirement.**

Two other policies of relevance to the consideration of the proposal include CP1 and E15. CP1 relates to the importance of development being sustainable and improving environmental conditions. This will be addressed below. E15 relates to farm diversification which seeks to safeguard the environment through such schemes and not prejudice farm viability. CPRE are concerned over the loss of particularly small farms to amalgamation and other uses. It is not clear as to whether the proposal is part of a farm diversification scheme or whether it will harm or enhance the viability of the existing business. The council should seek clarification so as the relevance or otherwise of this policy can be addressed. **CPRE currently has reservations over this issue**

**Thus we conclude overall that the proposed development does not comply with the development plan.**

### **Longney and Epney Parish Village Design Statement 2011**

This includes the application site in the area covered by this supplementary Planning Guidance. It is noted that policy LNE3 seeks to ensure that new development should be designed to conserve and enhance the character and appearance of the landscape and this character should influence the layout and form of any such development. Residents have also expressed a strong desire for the area to remain rural and its productive farmland, its wildlife, its silence and its unspoilt character be valued and maintained. **CPRE considers the proposed development does not accord with this policy and desire.**

### **Related application decisions and appeal decisions**

We also wish to draw to the Council's attention to four recent planning proposals relating to Solar Farms located on both sides of the Severn that have been rejected.

The first two concern proposals at Leonard Stanley near Stonehouse (S.15/1856/FUL and S.15/1781/FUL) with a combined area of 17 ha. They were refused on grounds of immense scale and industrial appearance, the urban and incongruous visual impact on the rural character of the surrounding landscape and the regimented arrangement, heavily manufactured and surface appearance appearing as an alien intrusion.

A much larger scheme on the Awre peninsular in the Forest of Dean extending to 108.5ha under reference (P0664/15/FUL) was refused on grounds of Lack of sequential test,

insufficient information on potential archaeology and on biodiversity and ecology, harmful effect on Heritage Assets and harm to a Valued Landscape not outweighed by the benefits.

An appeal was dismissed for a 8.3ha scheme at Cowle's Farm, Elton Road, Newnham in February 2017 under reference (APP/P1615/W/16/3148113 on grounds of potential effects on the Wye Valley and Forest of Dean Bats Sites SAC, harm to the setting of a listed building, substantial harm to the landscape character and visual enjoyment of the area and noise impacts on the neighbouring property that clearly outweighed the benefits and would not represent sustainable development having regard to the policies in the NPPF. This site has similar characteristics to the application site being undulating, surrounded by trees and hedgerows, in arable use and being crossed by public footpaths. The Inspector considered it was a valued landscape as did all the parties at the appeal.

We consider that there are some useful parallels between this case and the related schemes in terms of the industrial and alien nature of the proposals, lack of sequential test, insufficient information on archaeology and harm to the landscape and visual amenity that outweigh the benefits arising from the production of renewable energy.

### **The Planning Balance**

We address the planning balance in terms of the three dimensions of sustainable development, and in terms of the development plan.

In economic terms the development will provide minor benefits in the construction stage and negligible benefits in the operational stage.

The proposed development does not in our view relate at all to the elements of the social dimension of sustainable development set out on paragraph 7 of the NPPF.

We consider it significant that there is no reference to social and economic effects of the development in the application.

Paragraph 7 of the NPPF also sets out the elements of the environmental dimension. The proposed development might help in "moving to a low carbon economy" but it emphatically does not contribute to "protecting and enhancing our natural ... environment". On the contrary, it will in our opinion have an extremely damaging effect on the natural environment which substantially outweighs any benefits arising from the generation of renewable energy.

Thus the balance – very limited economic benefits, no social benefits in the terms in which the NPPF defines them, and severe adverse environmental effects – in our opinion weighs very heavily against the proposed development.

In terms of the development plan, the proposals are clearly at variance with the relevant policies of the Stroud District Plan and Paragraph 2 of the NPPF not only affirms the importance of the development plan, but also makes it clear that the NPPF itself is a material consideration in planning decisions. As noted above, the permissive stance of paragraph 98 is strongly qualified by footnote 18. The particular other material considerations in this case derive from the sheer scale of the proposed development, which in this context also weighs heavily against the proposed development and the lack of information currently submitted.

## **Conditions and Related Matters**

Our firm conclusion, set out below, is that the planning application should be refused for the reasons outlined. If however the Council is minded to grant planning permission, we consider that the following matters should be taken into account.

A condition of permission should be that only the least reflective PV panels and other engineering features must be used, and that the choice must be submitted for approval before installation can commence.

We feel it is essential that a further planning condition be imposed in addition to the usual ones relating to landscaping, future management, and highway matters etc. The NPPF identifies that most PV solar arrays are temporary structures and the applicants have proceeded on the basis of a 30 year time span. It is, therefore, most important that the land does not lose its agricultural designation. We therefore request that any planning consent granted must include a condition that as soon as the currently intended PV solar array units cease to generate, the site will be decommissioned and the land fully restored to its original agricultural potential, and that it shall not be treated as 'previously developed' land for future planning purposes.

## **Conclusion**

CPRE concludes that the planning balance as discussed above falls strongly against the proposed development. If it were permitted, it would in CPRE's view fundamentally change the essential character of this valued site and its surroundings alongside the Severn estuary. It represents the industrialisation of the countryside on a massive scale in what we regard as a particularly sensitive location.

We therefore strongly urge the Council to refuse planning permission and would wish to be notified of any amendments and additional information that seeks to address our concerns.

*11 April 2018*

S.15/0537/FUL – Solar Development, land east of High Green, Longney

Outline of proposed solar development edged in red, with position of solar panels hatched in red.

Please see map for location of viewpoints.

Photos taken 24<sup>th</sup> February 2018.

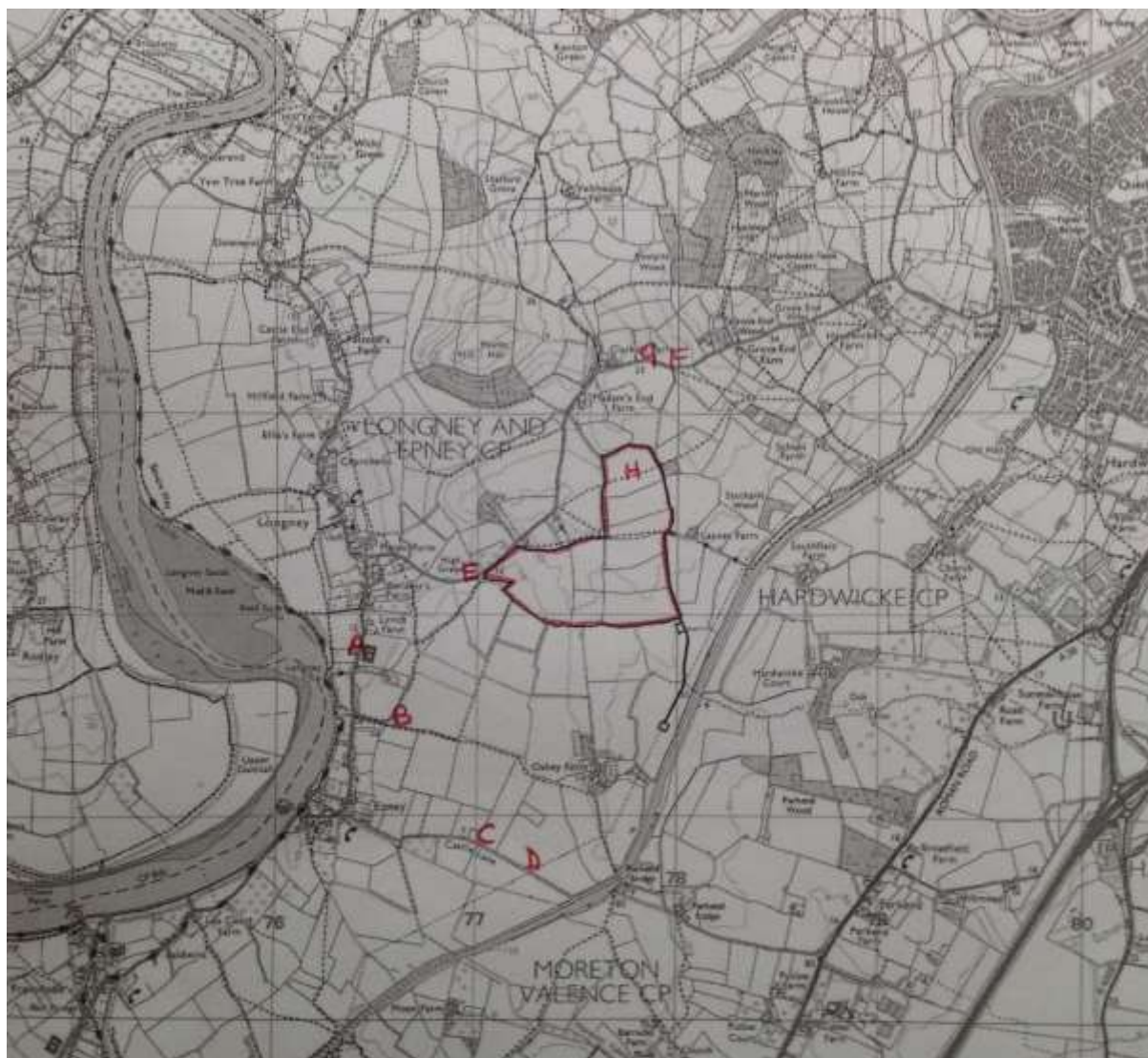
















View from Haresfield Beacon



View from Grove End Farm Bungalow – looking North into the site