

Compton PC response to Addendum to Planning Design and Access Statement August 24 - September 2024

The Addendum produced by Tor & Co on behalf of SSE Energy Solutions puts forward the case that there are 'very special circumstances' for a solar farm on the Hog's Back that override the National Planning Policy Framework (NPPF) policies regarding inappropriate development in the green belt.

The 'very special circumstances' case outlined in the Addendum rests on three key arguments:

- i) Increased energy costs threaten the University's ability to maintain and grow its business so therefore the University must be allowed to reduce its energy costs by building a solar farm on the green belt. As the University contributes to economic growth in Guildford, the solar farm is also of regional significance.
- ii) The solar farm contributes to the decarbonisation efforts of the University, Guildford Borough Council and Surrey County Council via their climate change strategies and action plans.
- iii) There are no suitable alternative non-green belt sites where the solar farm can be located.

Compton Parish Council rejects these arguments, for the reasons outlined below:

i) Increased energy costs threaten the University's ability to maintain and grow its business so therefore the University must be allowed to reduce its energy costs by building a solar farm on the green belt.

Whilst Compton accepts that energy security and financial stability are desirable for any business, we question whether the solar farm is the only option that could provide financial security for the University.

Tor & Co has not provided any financial information to demonstrate that the University is financially dependent on the solar farm going forward. Furthermore, staff and students have recently delivered a vote of no confidence in the University's Vice-Chancellor, Provost and Executive Board, which suggests that the University's financial problems may be more deep-rooted than just a problem of rising energy costs.

The University of Surrey used the same 'very special circumstances' argument about maintaining financial security and the University's role in contributing to the wider regional economy when pitching for the neighbouring Blackwell Farm development and Research Park extension, to go into the Local Plan. Blackwell Farm was allocated in the Plan, but just five years later the University is again arguing that it needs to raise more funding by developing another part of the green belt. If a potential £1bn development has not solved the University's financial problems, it seems unlikely that the solar farm will. However, the key

point is that the University should not be getting itself into a situation where it feels dependent on developing land that has been deemed “outstandingly beautiful” and which is against government and local policy.

Even if the University were financially dependent on the solar farm, Compton PC does not believe that by effectively providing financial support to a business (albeit an educational business) by allowing it to exploit a sensitive site is a ‘very special circumstance’ for building on the green belt, especially as the green belt land in question also meets other landscape criteria which collectively give great weight to refusal of the planning application. If getting the University out of a financial hole is a ‘very special circumstance’ for building on the green belt then arguably any large organisation could build anything anywhere: a 1,800-home housing estate, a business park, a solar farm, a factory. Given the University’s stated aims for its landholdings on the west of Guildford, it would be very likely that it would then push for this land to be developed for housing, after the 30-year project life.

ii) The solar farm contributes to the decarbonisation efforts of the University, Guildford Borough Council and Surrey County Council via their climate change strategies and action plans.

Compton Parish Council shares the Government’s and Guildford Borough Council’s support for renewable energy, and the PC is aware of their policies in favour of combatting climate change. However, the Government and GBC also have other important policies which protect against development on the green belt and environmentally sensitive land, and which collectively weigh more than the policy promoting renewable energy, especially as the amount of energy being produced is arguably relatively low. For example, the site chosen by the University is not only located in the green belt and on high-grade farmland, but it is also a high-quality landscape, surrounded by Ancient Woodland and home to protected species.

High-quality landscape

The independent Landscape and Visual Assessment (LVA) carried out on behalf of Guildford Borough Council (GBC) by Hankinson and Duckett states confirms this. It states:

“It is considered that the landscape of the site ... and its immediate surroundings are of high quality, including large blocks of woodland (some of which are Ancient) and a characteristic patchwork of fields that rise gently to the south up the dip slope, towards the ridge of the Hog’s Back (which coincides with the AONB.” (3.7)

Although Tor & Co attributes the disparity between the Hankinson and Duckett’s views of the landscape and its own to “a difference of professional opinion” (2.4.134), Compton PC would like to point out that Hankinson and Duckett’s views are supported by the Surrey Hills AONB Board Planning Officer, and by two other independent landscape architects: Landscape Management Services (LMS), who conducted an LVA for Compton, Worplesdon and Wanborough PCs in 2016; and more recently Alison Farmer Associates, who carried out an LVA for Natural England as part of the Surrey Hills AONB boundary review. It seems unlikely that three landscape experts (Hankinson and Duckett, LMS and Alison Farmer) are wrong.

Tor & Co seems to make light of the fact that the site of the solar farm is a candidate National Landscape area and argues that this doesn't have great weight in planning (2.2.218). However, Natural England, in its response to the application, states that, "*Whilst this assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the proposal.*" Whatever weight is given to NE's proposal to include this land in the new National Landscape boundary, Compton PC supports Natural England's view that "*the proposed development site has outstanding natural beauty and that it is desirable that it should form part of the Surrey Hills AONB.*" (Hence it should be conserved).

The Parish Council is aware that the designation order for the extended boundary has not yet been issued, but a new Consultation Analysis Report was published by Natural England in July. This Report considered lengthy objections to the solar farm site's inclusion in the new National Landscape boundary (presumably from the promoters of the solar scheme) and has rejected them.

Natural England in its response to the planning application advises that "*the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal... We also advise that you consult the relevant National Landscape Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the area's statutory management plan, will be a valuable contribution to the planning decision.*"

Compton PC urges GBC to follow the advice of Natural England and adopt the recommendations of the Surrey Hills AONB Board Planning Advisor, who has a wide breadth of "local landscape expertise". The PC also believes that the three LVAs should also offer GBC guidance on the quality and value of the landscape.

The developer's proposal to provide interpretative information (information boards, signposts and sculptures etc.) in publicly accessible areas to help enhance the AONB (2.4.208) is noted by the Parish Council. However, Compton feels that this ignores the primary purpose of the National Landscape which is to conserve the Surrey Hills' natural beauty. There is little doubt that a solar farm would detract from the natural beauty of this area. Compton PC would also like to point out that when pushing for the Manor Park development to go into the 2003 Local Plan, the University promised a way-marked nature trail through the ancient woodland and a visitor centre at the adjacent Manor Farm buildings. To date, neither of these two facilities has been delivered.

BMV Land

PC accepts Tor & Co's argument that the soil quality may not be damaged as a result of the solar farm (although this is debatable, and there is an increased likelihood that if developed it will not return to farmland). However, it does not appear that to date the land has suffered from intensive farming or that it would in the future. If this had been the case, more than 50% of the site would not be listed on the Magic Map as Grade 2 farmland. Tor and Co state that the Magic Maps data is out of date, and its own consultant has unsurprisingly come to a different conclusion about the quality of the land. Compton does not believe that solar farms should be sited on the Best and Most Versatile Land or indeed on any farmland where there

is a brownfield alternative. The Food Security Index 2024 states: *“While some shorter-term supply chain risks appear to be moderating, the UK continues to face risks associated with longer-term trends in climate and the environment.”*

In conclusion, Compton PC believes that the site’s collective constraints: its high-quality landscape, its proximity to Ancient Woodland, the fact that it would take an area of high-grade farmland out of production and disrupt the habitat of protected species are not outweighed by a reduction in the University’s carbon footprint.

The Tor&Co Addendum states that the University is “a significant carbon producer”. If this is the case, it would be useful to know what other steps the University has explored to reduce its carbon footprint that does not involve developing the green belt. Before reducing carbon can be considered a ‘very special circumstance’ for development of this site, we would need to know that all alternatives have been fully explored.

Of course, the University could simply purchase green energy from a third-party supplier and even support that supplier by investing in schemes that do not pose environmental harm. The University, like most of Guildford, is connected to the National Grid so it is not compelled to generate its only electricity on an unsuitable site. This leads directly onto the next argument posed by the University.

iii) There are no suitable alternative non-green belt sites where the solar farm can be located.

A large part of the ‘very special circumstances’ argument for building a solar farm on protected land rests on Tor & Co’s claim that the University does not have enough brownfield sites to house solar panels, and the Addendum refers to the Alternative Sites Assessment (also produced by Tor & Co), which repeatedly relies on two arguments for failing to build above the University’s surface-level car parks at Stag Hill, Manor Park and the Research Park:

- i) the installation would lead to a reduction in car parking capacity through the need to have supporting posts and ancillary equipment (3.13, 3.29, 3.45)
- ii) Installation would cause disruption during construction (3.13, 3.29, 3.45)

In the case of the Research Park car parks, the Alternative Sites Assessment states: *“Most are subject to leases with building occupiers and the work would likely require the consent of the lessee.”* (3.45)

None of these arguments are compelling, for example:

- i) Whilst a few car parking spaces may be lost, this is a small price to pay for the energy and cost savings involved in installing solar panels. Furthermore, as part of 2003 Local Plan, the University committed to making the Manor Park Campus car-free.
- ii) A quick trawl through the web suggests that the disruption when installing solar panels above car parks is minimal. For example, Sustain Commercial Solar states that *“Installing a solar system in your car park doesn’t have to be difficult or disrupt daily business activities.”*

(sustaincommercialsolar.com). Even if there were an element of disruption during the installation of panels, this is normal in any development. Taking cables from the solar farm to the University under the A3 is likely to cause far more disruption.

iii) It is unlikely that the Research Park tenants would refuse consent for the solar panels. Their staff and other visitors are likely to prefer the convenience of having shaded parking spaces in hot weather, and a protected place to park their vehicles during winter. Furthermore, solar panels above car parks can help a business improve its environmental credentials with staff and consumers.

The Addendum acknowledges “the important role of ongoing brownfield development on the University campus” (2.4.73) and provides a pie chart, which shows that 9.4mwp of energy can be produced from solar installations above car parks and University buildings (more than two-thirds of the energy that would be produced from the solar farm on the Hog’s Back). We note that this does not seem to include the park-and-ride facility, its extensive car parks and buildings on the University-owned Research Park, nearly all of which are flat-roofed. Why have these sites been excluded? If the Research Park is included in Tor & Co’s equation, the total mwp generated on University-owned brownfield land could well be higher than that on the proposed solar farm on the Hog’s Back.

Compton PC is pleased that the University now plans to place solar panels above some of its car parks (despite its previous arguments about obstacles to their installation), but why have these panels not already been installed? The promise of future installations carries little weight in planning. In 2003, the University committed to putting a green roof on its Sports Centre, but that has not yet materialised. The government and Guildford Borough Council both have a ‘brownfield first’ planning policy, which should be adopted without exceptions. Compton PC believes all these brownfield sites on the University-owned land should be utilised before any more green belt is developed.

Finally, as touched under point ii) above, the University doesn’t address the big issue that it is not compelled to generate its own electricity itself, and on an unsuitable site. In the same way, Guildford Borough Council should not allow it.