

**Application No:** 25/00760FULL Major - EIA

**Site:** Land off Fletchwood Lane, Totton, Southampton SO40 7DZ

**Proposal:** Installation of ground-mounted photovoltaic farm; associated infrastructure and engineering works; deer fencing, pole-mounted CCTV; community open space; landscaping and habitat enhancement for a temporary period of 25 years

**Applicant:** Trant Estates Ltd

**Case Officer:** Carly Cochrane

**Parish:** Netley Marsh Parish Council  
Ashurst and Colbury Parish Council

**1. REASON FOR COMMITTEE CONSIDERATION**

Major Development

**2. POLICIES**

**Development Plan Designations**

None applicable

**Principal Development Plan Policies**

DP2 General development principles  
 DP12 Flood risk  
 DP18 Design principles  
 SP1 Supporting Sustainable Development  
 SP3 Major Development in the National Park  
 SP6 The natural environment  
 SP7 Landscape character  
 SP14 Renewable energy  
 SP15 Tranquillity  
 SP17 Local distinctiveness  
 SP55 Access

**Supplementary Planning Documents**

Design Guide SPD  
 Ashurst & Colbury Village Design Statement SPD

**NPPF**

Sec 2 - Achieving sustainable development  
 Sec 11 - Making effective use of land  
 Sec 12 - Achieving well-designed places

Sec 14 - Meeting the challenge of climate change, flooding and coastal change

Sec 15 - Conserving and enhancing the natural environment

### **3. MEMBER COMMENTS**

None received

### **4. PARISH COUNCIL COMMENTS**

Ashurst and Colbury Parish Council: Recommend refusal but would accept the decision reached by the National Park Authority's Officers under their delegated powers.

Netley Marsh Parish Council: Recommend permission but would accept the decision reached by the National Park Authority's Officers under their delegated powers.

### **5. CONSULTEES**

Archaeologist: No objection subject to conditions.

Ecologist: (Summarised) The proposal meets the requirements in respect of BNG and would provide enhancements. Does not consider these justify the proposal or outweigh the other policy conflicts.

Landscape Officer: (Summarised) Objection. The proposal does not conserve or enhance the character of the New Forest landscapes, and the intrinsic value and special qualities of the landscape would be deleteriously impacted.

Planning Policy Officer: (Summarised) Recommends refusal. While the provision of renewable energy is a benefit of the scheme, in itself it is not considered to outweigh the fundamental conflict with several key development plan policies. The proposal is not linked to individual households, businesses or local community use within the National Park. It is not considered that the proposals meet the exceptional circumstances required for major development to be permitted within the National Park, as per the tests in paragraph 190 of the NPPF, 2024.

Environment Agency: No objection. A Flood Risk Activity Permit would be required.

Esso Petroleum Company: No objection subject to the proposals adhering to the 'Special Requirements for Safe Working' guidance and the covenants contained in the Deed of Grant are adhered to.

Hampshire County Council Access Development: General advice provided, no comments made specific to the application.

Hampshire County Council Highways: (Summarised) Further details required in respect of visibility splays, availability of passing bays and

height of tree canopies. A condition survey of Fletchwood Lane should be undertaken prior to commencement of development and following construction.

Natural England: No objection subject to appropriate mitigation being secured.

New Forest District Council Environmental Protection: (Summarised) No adverse comments. Proposed development is not expected to generate any significant noise.

## **6. REPRESENTATIONS**

Two letters of representation have been received from Interested Parties, summarised as follows:

The New Forest Association: Objection. Proposal fails major development test of the NPPF and does not further the purposes of the National Park. Contrary to Local Plan policies. Major detrimental effect on the landscape. Contests that there is a benefit to commoning.

The Trustees of the Barker-Mill Estates: Support. Proposal would provide environmental benefits. Consider the proposals to meet the main first purpose of the National Park.

17 letters of representation have been received from members of the public; five in support of the application; nine object to the application and three make comment. In summary, and in respect of the letters of support, the comments made relate to the provision of renewable energy and provision of ecological improvements.

In respect of the letters of objection, the concerns raised relate to concerns in relation to detrimental impact upon the landscape; loss of farmland; development not benefitting the National Park; inappropriate siting; concern with regard setting a precedent for this type of development; concern with regard to highway safety; and noise.

## **7. RELEVANT HISTORY**

Replacement of existing barn with a barn of same footprint for flexible use as battery storage and agriculture (Application for a Non-Material Amendment to planning permission 23/00188FULL) (24/01263) Raise No Objection, 14 November 2024

Application for Scoping Opinion under regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for a solar park, associated infrastructure and landscaping (24/00440SCP) scoping response issued on 01 July 2024

Replacement of existing barn with a barn of same footprint for flexible use as battery storage and agriculture (23/00188) granted on 12 July 2023

Outline application for 6 affordable houses; demolition of existing agricultural buildings, access, layout and scale to be considered (21/00062) refused on 19 March 2021

Courtyard of Class B1 Business units; access drive & parking; demolish existing buildings (Outline planning permission with details of Layout & Access only) 08/93606) refused on 20 January 2009; Appeal dismissed 09 December 2009

## **8. ASSESSMENT**

### **Application Site**

8.1 The application site comprises a 13.5 hectare (ha) area of agricultural land used for the low-key grazing of livestock, to the south and east of the residential property of Great Fletchwood Farmhouse, and to the east and north of agricultural buildings at Great Fletchwood Farm, both of which are within the applicant's ownership. The site is divided by a track which runs east to west and provides access to the agricultural land, with that to the north of the track further subdivided into smaller parcels, and that to the south comprising two larger parcels. The site is bordered along all boundaries by trees and vegetation, with a Bartley Water tributary along the northern boundary and with further agricultural fields beyond, across which is a Public Right of Way (PROW). The eastern boundary is formed by the Bartley Water, with agricultural land beyond which slopes upwards to the main railway line running between Southampton and the South West. The Fletchwood Meadows Site of Special Scientific Interest (SSSI), owned by the Hampshire and Isle of Wight Wildlife Trust, adjoins the south-eastern boundary, and there are further agricultural fields to the south. The western-most boundary adjoins Fletchwood Lane, a single track, no-through road. The most eastern and northern areas of the site are located within either Flood Zones 2 or 3, following the Bartley Water.

8.2 By way of background, and of note as part of this application, is planning permission reference 23/00188, for the replacement of an existing agricultural building for a flexible agricultural and battery storage use. Relevant conditions were discharged in 2024, and the 2023 permission was then subject of a non-material amendment (reference 24/01263). Whilst this permission is extant, it has not yet been implemented.

### **Proposed Development**

8.3 This application seeks permission for the use of the land as a solar park through the provision of 8,698 solar panels arranged across five 'parcels' of land to the north and south of the existing track, and with new tracks projecting north and south through the solar tables. The panels would project between two to three metres above ground level. The entirety of the area comprising the solar panels would be enclosed by 1.8 metre high deer fencing. The

'parcel' adjacent to the north-western site boundary, being that which would be retained as part of Great Fletchwood Farmhouse, would provide a new 'Community Nature Space', including native-species rich hedgerows, a pond, grassland and scrubland. A further community space is proposed to the south of the building to be used for the battery storage.

8.4 The solar park would generate a total output of 4.35 Megawatts (MW), and permission is sought for a period of 25 years. Via the aforementioned battery storage, the site would then be connected to the National Grid via a subterranean connection to the existing electricity substation at Fletchwood Lane, approximately 380 metres to the north of the building which would contain the battery storage. It is stated within the Planning Statement that the objective of the proposed development is to support the applicant, being Trant Estates Ltd, attain its targeted Climate Strategy Towards Carbon Net Zero, whilst also contributing to the local and national need for renewable energy.

8.5 Additionally, the development is subject to the requirement of providing measures for ecological enhancement, resulting in at least 10% biodiversity net gain (BNG). The proposal would involve habitat creation, resulting in the net gain of +24.69% of area habitats, +86.82% of linear habitat and +70.88% of watercourse habitat.

8.6 The application is accompanied by the following supporting documents:

- Archaeology Desk Based Assessment including Geophysical Summary and Archaeology Geophysical Survey Report
- Beekeeper Agreement
- BNG Metric and BNG Assessment and Habitat and Monitoring Plan
- Commoners Support Letter
- Design and Access Statement
- Environmental Statement
- Flood Risk Assessment and Drainage Strategy
- Ground Conditions and Agricultural Land Value Report
- Hampshire & Isle of Wight Trust Letter of Support
- Planning Statement
- Preliminary Ecological Appraisal
- Site Selection Report
- Smart Energy Appraisal
- Solar Voltaic Glint and Glare Study
- Statement of Community Engagement
- Transport Statement
- Trant Estates Climate Strategy Towards Net Carbon Zero and Trant Estates Renewable Energy Assessment
- Tree Inspection Report
- Wintering Birds Survey

## Consideration

- 8.7 The key considerations in this case relate to the principle of major renewable energy development within the National Park, and the impact upon the nationally protected landscape. Other considerations comprise: the impact on trees and ecology; the impact on heritage assets; the benefits that would be delivered in terms of renewable energy and community uses; transport and access considerations; and the impact on residential amenity.

## Policy Background

- 8.8 The protection afforded to National Parks through primary legislation, being the National Parks & Access to the Countryside Act 1949, is reflected in paragraph 11 of the 2024 National Planning Policy Framework (NPPF) in respect of the presumption in favour of sustainable development. This paragraph and its associated footnote (7), recognise the National Park designation as a policy that protects areas of particular importance, providing a strong reason for restricting the overall scale, type or distribution of development in the area. Paragraphs 189 and 190 of the NPPF establish the key principles of national planning policy for National Parks, namely:

- “Great weight” should be given to conserving and enhancing landscape and scenic beauty in National Parks, which have the highest status of protection in relation to these issues.
- The conservation and enhancement of wildlife and cultural heritage should also be given great weight in National Parks.
- The scale and extent of development within National Parks “should be limited”.
- Permission should be refused for major development in National Parks “other than in exceptional circumstances”. Consideration of such applications should include an assessment of: (i) the need for the development; (ii) the scope for developing outside the National Park; and (iii) the extent to which any detrimental impacts can be moderated.

- 8.9 The national policy position in paragraphs 189 and 190 of the NPPF needs to be considered alongside paragraph 168. This sets out that when determining planning applications for renewable and low carbon development, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions. The NPPG resource on ‘Renewable Energy’ confirms that in considering planning applications for renewable energy development “it is important to be clear that the need for renewable or low carbon energy does not automatically override

environmental protections” and that, “proposals in National Parks...and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration” (paragraph 007). This Government guidance is pertinent to the consideration of this application, as is the National Park Authority's declaration of a nature and climate emergency

- 8.10 In respect of the relevant policies within the adopted New Forest National Park Authority Local Plan 2016-2036 (2019), Policy SP3 (Major Development in the National Park) and its supporting text set out the policy position in respect of such major development. Paragraph 4.9 outlines, “The NPPG states that it will be a matter for the relevant decision taker as to whether a proposed development within the National Park should be treated as major development, taking into account the proposal in question and the local context.” Paragraph 4.10 goes on to state, “major development is development of more than local significance (i.e. it would exceed the local-scale development needed to address the socio-economic needs of the National Parks 35,000 residents) which would have a long-term impact on the landscape, wildlife or cultural heritage of the National Park because of its scale and form. This can include major residential and commercial development, significant infrastructure projects and power generation.” The proposed development, with a site area of 13.5ha is considered to comprise major development within the New Forest National Park and therefore the requirements of Policy SP3 of the Local Plan (2019) and the tests of paragraph 190 of the NPPF (2024) are engaged.
- 8.11 Policy SP3 subsequently sets out that, where a proposal qualifies as major development, “planning permission will only be granted in exceptional circumstances *and* where it can be demonstrated to be in the public interest” (emphasis added). Considerations of such applications should include an assessment of the need for development; the cost of and scope for developing outside the National Park, or meeting the need for the development in some other way; detrimental effects on the environment, landscape and recreational opportunities, and the extent to which the effects could be moderated; detrimental effects on the special qualities of the National Park and whether they can be mitigated; and the cumulative impacts of the development when viewed with other proposals.
- 8.12 Throughout the adopted local planning policies for the New Forest National Park there is support for small-scale renewable energy schemes for households, businesses and local community facilities. Many appropriate proposals have received planning permission in the National Park, including the solar panels at the New Forest Centre in Lyndhurst, the solar panels integrated into the design of Woodgreen Village Shop, and the solar canopy on part of the car park at Paultons Park. Policy SP1 (Supporting sustainable development) states that sustainable development in the National Park is that which is resilient and responsive to the

impacts of climate change through improved energy efficiency and making appropriate use of small-scale renewable energy.

- 8.13 Policy SP7 (Landscape Character) requires the design, layout, massing and scale of proposals to conserve and enhance existing landscape character of the National Park and not detract from the natural beauty of the National Park. The policy also states that the character of largely open and undeveloped landscapes between and within settlements should not be eroded or have their setting harmed. Paragraph 5.30 of the supported text states, “an important aspect of national policy is its recognition that planning should recognise the ‘intrinsic’ character and beauty of the countryside. Landscape character cannot be solely determined by what is visible from a publicly accessible location. It is the combination of all the various elements and features of the landscape described in the Landscape Character Assessment that make the National Park’s landscape character special.”
- 8.14 Policy SP11 (Climate Change) states that the National Park Authority will support proposals to mitigate climate change through, “supporting small-scale renewable and low carbon energy generation.” Paragraph 5.67 of the supporting text states: “the potential for renewable energy generation within the National Park will need to be balanced against the potential adverse visual and amenity impacts on the landscape.” As outlined in paragraph 8.12 of this report, there are numerous examples of where the Authority has granted planning permission for small-scale renewable energy proposals that do not have adverse landscape impacts.
- 8.15 Policy SP14 (Renewable Energy) states that development proposals for renewable energy generation will be permitted where they, “are small-scale and provide energy for individual households or businesses, or small local community facilities.” Paragraph 5.68 of the supporting text states, “to avoid compromising the landscape character and beauty of the National Park, the policy emphasis is on supporting appropriate, small scale renewable energy developments that provide energy for an individual household or business use, or for a small local community facility within the National Park.” This policy position links to the Authority’s socio-economic duty to local communities within the National Park. The supporting text to policy SP14 is clear that “larger renewable energy developments to meet a wider-than-local need are not appropriate within the National Park.” This policy position represents a conscious shift from the previous development plan policies for the National Park area that existed until the adoption of the Local Plan in August 2019 and which was supported by the Government-appointed Planning Inspectors who independently examined the Plan.
- 8.16 Policy SP15 (Tranquillity) and supporting text highlights that the tranquillity of many parts of the New Forest is one of its valued ‘special qualities’. Tranquillity is described as the relative peace and naturalness, combined with the open and unfenced landscape

that gives a sense of space, remoteness and freedom. Impacts on tranquillity can be from man-made noise and visual disturbance in the natural environment. Policy SP15 states that new development should avoid, or provide mitigation measures, if the proposal will lead to noise, visual intrusion, nuisance and other unacceptable impacts on the National Park and its special qualities. Paragraph 5.76 of the Local Plan confirms, “tranquillity can be damaged by intrusive sights and sounds, particularly from man-made structures, highlighting that the perception of tranquillity relates to both visual and aural experiences.

## Planning Case

8.17 The case submitted is that the proposed development would achieve “exceptional circumstances” in the public interest and would therefore accord with Policy SP3 of the Local Plan and paragraph 190 of the NPPF (2024) for major development to be permitted in the National Park. The asserted benefits of the scheme which are considered by the applicant to benefit and/or mitigate the proposal are set out within the Planning Statement, and are as follows:

- A shared site with a consented battery scheme which offers opportunities to maximise the solar energy output in a consistent delivery to the grid. This enables no loss of energy during high generation periods e.g. middle of a sunny day and output at times where there is no solar generation e.g., overnight.
- The site is in close proximity (300m) to a substation with capacity. The capacity has been secured by Trant Estates through a DNO connection offer.
- The Step-Up Transmission Substation is already permitted removing the need for this element within the landscape setting as it will be enclosed within an existing barn.
- Substantial biodiversity net gain of +24.69% of habitat, +86.82% of hedgerow and +70.88% of watercourse
- Enhancement of the setting of the adjacent Site of Special Scientific Interest (SSSI) where habitat provision is provided as a buffer to the core of the SSSI. This has been reviewed with Hampshire and Isle of Wight Wildlife Trust who are supportive of the ecological proposals.
- Provision of commoners grazing both amongst and adjacent to the panels.
- Retained agricultural use of the site in a layout more common with this part of the New Forest National Park (smaller fields).
- No use / loss of best and most versatile agricultural land.
- Farm diversification providing real local benefits through energy, honey, sheep and pollenating benefits.
- The proposed development is accompanied by swales which creates a betterment to the existing drainage of the site.

- The nature of the development is one of a temporary feature for 25 years.
- Generation 4.35 megawatts per year of renewable energy which over the lifetime of the project equates to 23,850 tonnes of carbon dioxide being offset.
- Access to renewable energy generation supporting local business (Trant) based in Totton in its climate strategy towards achieving carbon zero.
- Green credentials provided by this development, enhances Trant's ability to attract and retain staff through having strong green credentials as an organisation. This supports a local employer.
- Provision of jobs in both operation and construction.
- Creation of a community fund (similar to the solar scheme in Lymington) where a percentage of net profits of the development contribute to local projects in conjunction with the parish and local council.
- The solar panels are not visible from any public location except for glimpse views from the public right of way. The landscape views are benefited by the proposed planting at Year 15.
- Provision of community spaces including a nature space and a wild flower meadow. The wild flower meadow is provided based on consultation with Netley Marsh Parish Council who highlighted that there is a local community group which counts butterflies and would value the opportunity of a wild flower meadow community space to undertake their activities.
- Community spaces reducing the recreational impacts on the areas of the national park inside the perambulation boundary and adjacent special protection areas of Sites of Special Scientific Interest.
- Ecology enhancements including provision of new habitats (see Landscape Strategy Plan); provision of bird and bat boxes; provision of bee hives which would be supported by a local beekeeper.
- The solar panels are located in Flood Zone 1 and 2 and the proposed development is accompanied by a sustainable drainage strategy.
- There are no significant impacts in terms of glint and glare.
- There are no heritage impacts.
- Proposed development incorporates benefits to tree provision on site.
- The solar panels do not result in a noise, air quality or other form of pollution impact and can be recycled at the end of their life.
- Apart from rare maintenance visits the site there is little trip generation in operation which is less than the existing paddocks.

The Authority's consideration of this case is set out below.

## **Climate change and National Parks**

- 8.18 The National Park Authority declared a climate and nature emergency in 2020. The Authority is working with partners to combat the effects of the climate and nature emergencies through mitigation, adaptation and education. The National Park Partnership Plan sets out the priorities for 'net zero with nature' and the contribution the New Forest can make towards addressing the impacts of climate change. The focus is on nature-based solutions and the restoration of habitats (including heathlands and wetlands) in the protected landscape of the New Forest, rather than large scale commercial solar developments.
- 8.19 The Government's online Planning Practice Guidance [Paragraph: 007 Reference ID: 5-007-20140306] sets out that, in shaping local criteria for inclusion in Local Plans and considering planning applications, it is important to be clear that:
- The need for renewable or low carbon energy does not automatically override environmental protections;
  - Cumulative impacts require particular attention, especially the increasing impact that wind turbines and large scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases.
  - Local topography is an important factor in assessing whether wind turbines and large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas;
  - Great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;
  - Proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration; and
  - Protecting local amenity is an important consideration which should be given proper weight in planning decisions.
- 8.20 The Authority supports appropriate renewable energy schemes which contribute towards achieving carbon net zero, and policies SP11 and SP14 are reflective of this. However, national and local planning policy is clear that the wider national policy support for the delivery of renewable energy schemes does not override the legal protections for National Parks.

### **Consideration against 'major development' tests**

- 8.21 It is common ground between the National Park Authority and the applicant that the proposals represent 'major development'. In terms of the need for the development, the National Planning

Practice Guidance (NPPG) resource on 'Renewable Energy' is clear that the need for renewable or low carbon energy does not automatically override environmental protections. This is particularly relevant given the site's location within one of only ten National Parks in the country. The submitted Planning Statement states that the proposal "has the potential to produce significant renewable energy for consumption in the vicinity of the National Park." As the energy generated would be fed directly into the National Grid, it cannot be reasonably argued that the development would directly or solely benefit communities within the National Park. The scheme would not provide energy for an individual household or business within the National Park as per Policy SP14 and similarly is not for a small local community facility located within the National Park. Whilst the Planning Statement sets out that the proposals would include the creation of a 'Community Fund' where a percentage of the net profits would contribute to local projects in conjunction with the parish and local councils, the development is not a local community co-operative. Trant Estates Ltd, whilst broadly 'local' to the application site in that the office is based in Totton, is located outside of the National Park.

- 8.22 In respect of the scope for the development to be located outside the National Park, the Planning Statement sets out the 'Need Assessment Approach', informed by the Site Selection Report which ultimately identified the application site as the most appropriate site for the proposed development. The other sites which were considered to have potential for the same development but were ruled out following a Landscape Visual Impact Assessment (LVIA) were all located within 1 kilometre (km) of the application site, despite the search radius of 5km. This 1km radius has been dictated by the location and available capacity of the Fletchwood Lane substation. However, the requirement to explore the scope for developing outside the National Parks is a key element of national policy, and whilst the connection point to the electricity network, either at a distribution or transmission level, is a material consideration, this in itself cannot be determinative in deciding where new renewable energy developments take place, and must be weighed in the planning balance with the statutory protections afforded to National Parks in primary legislation. The radius for the alternative site search is very limited and focuses within and in very close proximity to the New Forest National Park.
- 8.23 In respect of effects on the environment, landscape and recreational opportunities and the extent to which they could be moderated, it is noted that in summary, the LVIA and Environmental Statement identifies an intrinsic landscape change, however, it is considered by the applicant that this change would result in an overall benefit to the landscape character. The Planning Statement comments that the landscape character of the application site and its immediate surrounds do not reflect the "intrinsic character of the more rural heart of the National Park within the Perambulation." When assessing landscape character,

the same considerations are applied across the entirety of the National Park, and therefore it is the whole of the National Park which benefits from the highest level of protection in relation to landscape and scenic beauty as set out in the NPPF. The application site was included within the designated National Park boundary in 2005 following an extensive landscape assessment and public enquiry because it met the statutory criteria for inclusion. Approximately 50% of the National Park lies outside of the perambulation boundary, however, it is of no lesser landscape importance or significance than the areas inside the perambulation boundary, which is what the Planning Statement infers.

- 8.24 Paragraph 6.35 of the adopted New Forest National Park Design Guide SPD (2020) (Design Guide SPD) states, “any application for large-scale solar PV arrays will be subject to rigorous examination and expected to clearly demonstrate that the special qualities of the National Park will not be compromised by the development, and that the intrinsic value of the landscape is retained.”
- 8.25 Whilst it is acknowledged that a detailed case has been submitted by the applicant, seeking to demonstrate that the development can be considered ‘exceptional’ and also not easily replicated elsewhere in the National Park due to the opportunities for enhancements both on and off site, it is not considered that the major development tests set out in national or local policy have been satisfied. Whilst the general need for the provision of renewable energy is recognised and indeed supported within the Local Plan, the need for the major development proposed to be specifically located within the National Park, as opposed to outside of the nationally protected landscape, has not been satisfactorily demonstrated. It is acknowledged that there is an extant permission for a battery storage on site, and that the location of the site can benefit from a direct connection point to the grid, however, it is considered that this has been afforded undue weight by the applicant. Further, the ownership of the site should not be a determinative factor when weighed in the planning balance with the statutory protection afforded to the National Park through primary legislation, as well as national planning policy.

### **Landscape Impacts**

- 8.26 The site falls within Landscape Character Area (LCA)12: Hythe and Ashurst Forest Farmlands and the Landscape Type and is described as ‘Heath Associated Smallholdings and Dwellings’, with the relevant key landscape characteristics as follows: “...settled farmland on the edge of the forest heaths with large copses and some wood pasture. Small-medium scale pastures (from both formal and informal enclosure) bordered by hedgerows with hedgerow trees. The period of predominant character is 17th-18th century farmland. Major infrastructure, including the A35 and main line railway are in close proximity. Scattered farm houses and outbuildings are in the vicinity. Views are generally short, most usually to the next field boundary or woodland edge. The

landscape has a strong estate character.” The relevant key positive landscape attributes are as follows: “Small to medium sized Parliamentary enclosures are in evidence with some remaining areas of irregular assorted fields. Predominantly pastoral land use is exhibited, with paddocks used as commoner’s grazing. There is a traditional settlement pattern of dispersed farmsteads and hamlets.”

- 8.27 In respect of the Landscape Quality Objectives and Strategy, the vision for this area is for a “strong Forest-edge landscape with a legible separation in character from the surrounding and nearby urban fringe”, also with paddocks around small holdings used for the grazing of commoners’ stock. The overall landscape strategy is to protect the positive landscape attributes valued within it. The relevant future landscape management guidelines are to “protect and strengthen the historic small scale field patterns, enclosed by a well-managed hedgerow network. Protect the stock of paddocks used as traditional commoner’s grazing. Manage the grazing land use of the landscape’s fields to maintain the continuity of a pastoral landscape. Protect the agricultural land uses of the area, to minimise the development of alternative land uses.”
- 8.28 In addition, the New Forest National Park Authority's Landscape Action Plan (LAP) specifically considers renewable and low carbon technologies and identifies that “field scale solar PV development could potentially have a large landscape impact due to its large scale and unnatural, semi-industrial appearance. The LAP states that if free standing PV arrays are to be used, they should be small scale, sited within the domestic curtilage of a dwelling or associated with outbuildings close to the dwelling. This is reflected in Policy SP14 of the Local Plan.
- 8.29 The proposal includes a large number of purported mitigation and enhancement measures, as set out at paragraph 8.17 of this report. The changes to the intrinsic landscape character identified within the LVIA are considered by the applicant to be balanced by the maturing of the planting at Year 15. Whilst the additional planting, alongside the other biodiversity enhancements such as the introduction of beehives and bat boxes, and the wildflower meadow are indeed welcomed enhancements which, in isolation, would benefit the natural environment which in turn supports the landscape character, not only could these enhancements be implemented without the need for a planning permission, these are not considered to outweigh the negative effect and urban intrusion on the intrinsic landscape value of the site that the proposals, in their entirety, create.
- 8.30 The Environmental Statement asserts that there would be “very few views of the development proposals during its operation” and that “after 15 years the proposed landscaping would screen views of the panels, even in the winter”. These statements appear to, at best, not give the appropriate weight to, and at worst, disregard, the impact of the proposal on the intrinsic quality and value of the

landscape. There are many parts of National Park that cannot be seen from public vantage points due to, for example, changes in topography, absence of PROW, and boundary treatments, but that does not confer on that land a greater propensity to absorb development or that there will be no impact arising; the inability to view a site in a wider context does not equate to no harm arising as a result of a development. Should this logic of no public visibility equating to no harm be applied, large parts of the National Park would be vulnerable to development, and such an approach does not consider cumulative impacts of development on the intrinsic landscape character. Any views of the proposal, whether direct or glimpsed, could be considered harmful to the special quality and intrinsic landscape character of the National Park, and even in the absence of any public views of the development, the intrinsic landscape value of the site, such that the proposal would not conserve or enhance the landscape character. Overall, the proposed development would have a harmful effect on the character and appearance of the area and would fail to conserve and enhance the natural beauty of the National Park, being the first statutory National Park purpose. The proposal is therefore considered contrary to Policies SP7, SP14, SP15 and SP17 of the Local Plan.

### **Impact on Trees and Ecology**

- 8.31 The proposal seeks to provide significant biodiversity enhancement and gains, however, it is noted that the majority of these enhancements could be delivered immediately without the provision of a solar array or any type of planning permission. The Authority's Ecologist, whilst broadly supportive of the development in respect of the biodiversity enhancements and whilst considering that the proposal is in general policy compliance, likely to meet and potentially modestly exceed the statutory 10% requirement for biodiversity, notes that the delivery of the scheme is not so significant in biodiversity habitat terms, for example, the delivery of especially rare habitat, to outweigh other relevant policy considerations.
- 8.32 There is a variety of mature tree species along the site boundaries, and the proposal would not compromise the long-term retention of any high-amenity landscape trees. The proposed additional tree planting would benefit the site, particularly given the inevitable loss of Ash trees suffering from Ash Dieback. However again, the appropriate and proper management of trees is not reliant upon or only facilitated by the proposed development and should be undertaken as part of the management of the land.

### **Heritage and Archaeology**

- 8.33 Paragraph 207 of the NPPF sets out that, where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate

desk-based assessment and, where necessary, a field evaluation. An Archaeological Desk Based Assessment and Geophysical Survey have been submitted, and the Authority's Archaeologist has no objection to the details within these documents.

### **Transport and Access, including Public Right of Way**

- 8.34 Fletchwood Lane is generally single-track, and the access to the site from Fletchwood Lane would require widening to allow access during the construction and delivery phase of the development. Hampshire Highways Authority have raised concerns in respect of user safety of Fletchwood Lane given the limited opportunity for safe passing points and it has not been demonstrated that the site could be accessed safely to the satisfaction of the Highways Authority.
- 8.35 The proposal would not have any direct impact on the PROW to the north of the site in that the development would not impede access. The impacts on users of the PROW relate to the physical changes in the character and appearance of the landscape which would be visible; these issues are covered at paragraphs 8.26-8.30 of this report. Views of the site are also possible from the main railway line between Southampton and the South West which passes to the east of the application site.

### **Impact upon residential amenity**

- 8.36 Great Fletchwood Farmhouse is the closest residential property to the application site, and whilst currently in the control of the applicant, impacts upon residential amenity must be considered. A number of representations have been received from members of the public; however, the objections do not directly relate to impacts upon residential amenity. New Forest District Council's Environmental Protection Team does not anticipate that the development, once operating, would generate any significant levels of noise which could not be controlled by an appropriate condition. The location of the site and the nature of the development is not considered to result in any significantly adverse impact upon residential amenity.

### **Other Considerations**

- 8.37 The applicant has positively engaged with a local commoner in respect of using the land for the grazing of sheep. The land is currently used for grazing, and the presence of the solar array would not alter the propensity of the land to be used for such purposes. This therefore holds no weight in the planning balance.
- 8.38 Despite the proximity of the site to the Bartley Water, the majority of the site is not within a flood zone, and those limited areas which are, would not result in the displacement of any flood water should a flood event occur. The Environment Agency have therefore raised no objection.

## **Planning Balance**

- 8.39 The adopted development plan for the National Park confirms the focus is on renewable schemes that provide energy for an individual household or business use, or for a small local community facility within the National Park. The development plan is clear that larger renewable energy developments to meet a wider-than-local need are not appropriate within the protected landscape other than in exceptional circumstances where the major development tests are met. The development plan is at the heart of the planning system and clear conflict has been identified with Policies SP1, SP3, SP6, SP7, SP11, SP14, SP15, SP17, DP2 and DP18. In addition to Local Plan policy SP3, it is not considered that the proposals meet the high bar set for demonstrating 'exceptional circumstances' for major development within the nationally protected landscape of the New Forest National Park set out in paragraph 190 of the NPPF (2024). It is therefore necessary to consider whether there are material considerations which indicate otherwise.
- 8.40 As aforementioned, the site benefits from an extant permission for a battery storage, and proximity to the Fletchwood Lane electricity substation. The proposal could provide 4.35 megawatts of renewable energy per year, which over the proposed 25-year lifetime of the development, could equate to 23, 850 tonnes of carbon dioxide being offset. Biodiversity enhancements in excess of 10% could also be achieved.
- 8.41 Whilst the need for renewable and low carbon development is recognised, national planning policy and guidance emphasises that this does not automatically override environmental protections, and careful consideration is needed when considering proposals in National Parks. The proposed development is considered to result in a harmful impact upon the intrinsic landscape character of the National Park which cannot be mitigated, and which would fail to conserve or enhance the natural beauty of the protected landscape. The provision of renewable energy therefore cannot and does not outweigh the fundamental policy objection in that the scale of development is not appropriate in a National Park, and the adverse impacts upon the landscape are unavoidable and unacceptable

## **Conclusion**

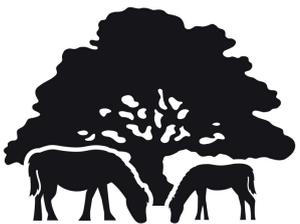
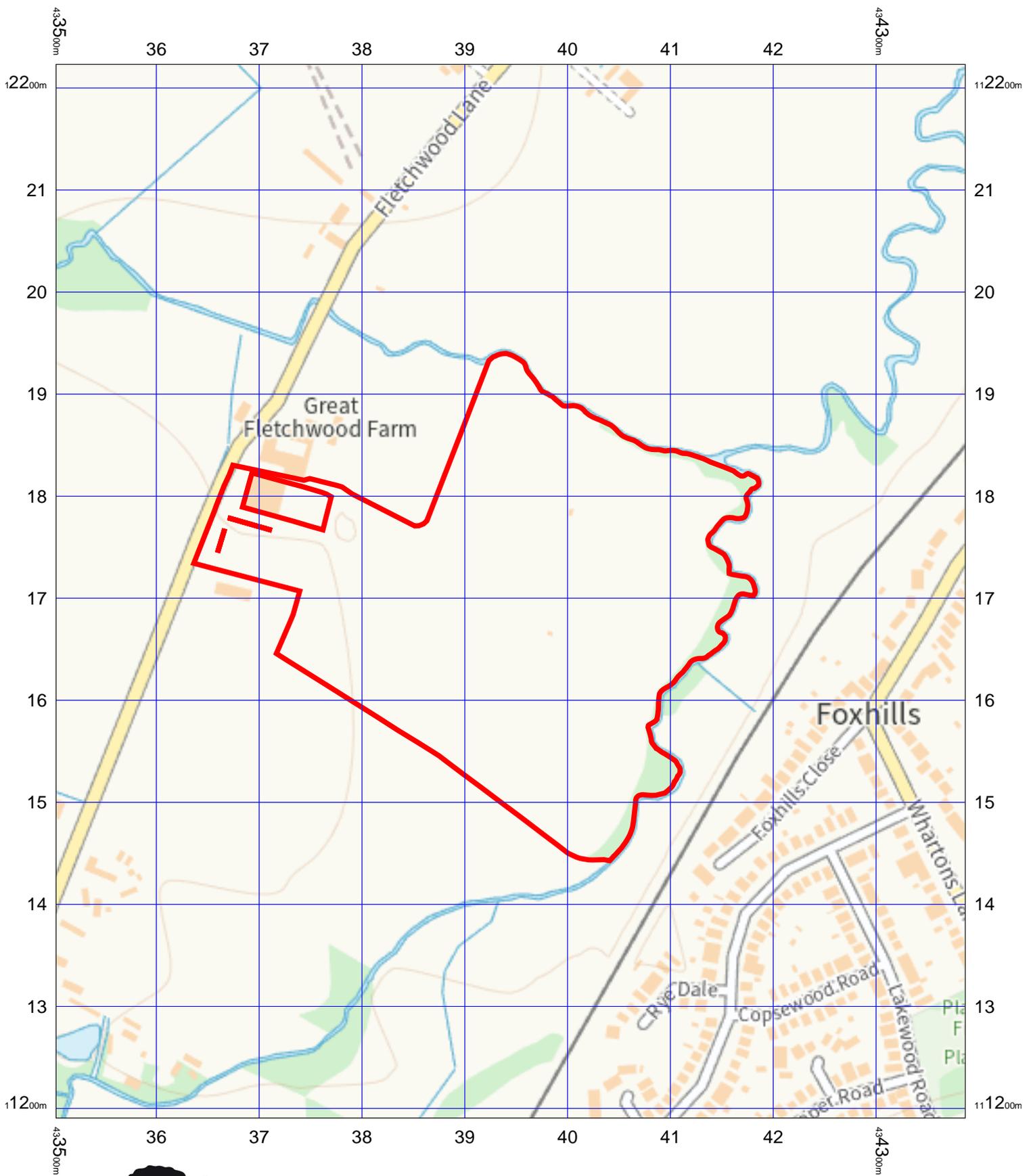
- 8.42 It is therefore recommended that permission be refused due to fundamental conflicts with both national and local planning policies.

## 9. RECOMMENDATION

Refuse

### **Reason(s) for refusal:**

1. Development of the scale and nature proposed is not considered appropriate in the protected landscape of a National Park. The proposed development would result in unacceptable harm to the intrinsic landscape character of the National Park which cannot be mitigated or outweighed. The proposal would therefore conflict with Policies SP1, SP3, SP6, SP7, SP11, SP14, SP15, SP17, DP2 and DP18 of the adopted New Forest National Park Local Plan 2016-2036 (August 2019); the first purpose for the designation of the National Park; and paragraphs 189 and 190 of the National Planning Policy Framework (2024). Furthermore, the proposed development would not seek to further the purposes of the National Park, contrary to the requirement of Section 245 of the Levelling Up and Regeneration Act 2023, which amended Section 11A of the National Parks and Access to the Countryside Act 1949.
2. It has not been demonstrated, on the basis of the submitted information, that the proposed development would not have an unacceptable impact on the safety of users of Fletchwood Lane, contrary to Policy DP2 of the adopted New Forest National Park Local Plan 2016-2036 (August 2019).



NEW FOREST  
NATIONAL PARK

New Forest National Park Authority  
Lymington Town Hall, Avenue Road,  
Lymington, SO41 9ZG

Tel: 01590 646600 Fax: 01590 646666

Date: 05/03/2026

**Ref: 25/00760FULL**

**Scale: 1:5000**

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