

## **PUBLIC MEETING INTO SOLAR APPLICATION**

I would like to mention briefly our reasons for attending this evening and why I fear that we will be objecting strongly to this application.

We have lived in Bentley for nearly 30 years. We farm several hundred acres at the north end of Bentley and in a nearby parish. We are also fortunate enough to be the temporary custodians of one of Bentley's remarkable collection of surviving ancient woodlands, Mungon's Grove. We have been approached by solar developers to erect a commercial solar installation on our farmland. We understand the need to move to more renewable energy and indeed we installed some of the earliest solar panels in Bentley as well as air source heat pumps, but we have said "no" to an industrial scale proposal on our land, as we believe the environmental impact would be far too great and we would strongly prefer to see the land farmed. Over the past 25 years, we have subscribed to various government backed schemes which pay farmers for creating and nurturing habitats and encouraging biodiversity on their farms. This has included arable reversion, hedge and tree planting on a large scale. These opportunities are increasing and do not have to come hand in hand with the industrialization for generations of the best and most versatile farmland which we are fortunate enough to have at Bentley.

Quite separately, I have practised at the Bar in the field of planning and environmental law for 35 years, the last 15 of which as Queen's Counsel and more latterly as King's Counsel. I am very familiar with national planning policy generally and in particular in relation to renewable energy and the difference between policy which applies to NSIPs and that which applies to application for local determination. It has surprised me that the application material dwells so heavily on quotations from the Draft Energy NPG which have no statutory force for

applications for local determination, which this is. I will save more on that matter for our formal objection.

Lastly, as a long time student of history as well as the law, I have devoted much of the last 10 years to studying the history of Bentley, which is surprisingly little known or written about. I have spent many hundreds of hours at the Suffolk Record Office, the National Archives at Kew, the British Library, Cambridge University Library and the Tollemache archive at Helmingham Hall. I also hold a large personal archive of deeds and maps relating to Bentley.

Much of this time has been spent unravelling the complex history of the parish over past 800 years or so, with the 4 Manors extant at the time of the Norman Conquest all still clearly recognisable today and still at the centre of farming operations. What a story there is to tell - when I have the time to write it all up. But for the purposes of this evening, I think my central message is to say to the parishioners of Bentley: you live in a truly remarkable parish where the historic mosaic of farmland, woodland, houses, farms and other buildings is very largely intact. And what treasures we have: Grade I and II\* listed buildings in abundance, no fewer than 15 separately identified and named ancient woodlands – more than any other parish in Suffolk, preserved initially for their timber and then for their sporting potential by the Tollemache family over many centuries. And at the heart of all this, centrally within the parish, lies Engry Wood and Falstaff Manor - one of those Norman manors, held by the Tollemaches from the reign of Henry VIII.

Is this the place to site 100,000 odd solar panels inside 4km of security fencing with innumerable CCTV cameras on 3m masts, innumerable inverters, 11 substantial transformers, and two substations including 7m tall elements? I would say: no. The application site stretches end to end 2 km across our village. It is much too much and cannot be absorbed by our village without very serious adverse impacts, which I fear will change the character of

Bentley and its historic core forever. And remember, the application says<sup>1</sup> the site will be decommissioned after 40 years “unless planning permission is secured for its continued operation”. Of course, once the infrastructure is all installed, paid for, the connections to the grid in place and functioning, the case for continued operation in perpetuity would, in my view, be very difficult indeed to resist. Most of us will be dead and gone and who will remember what the views to Engry Wood and the Church Tower once looked like or the song of the skylarks over the wide open fields. I am comforted that Babergh’s Heritage Officer states in her recent consultation response: “I am not convinced that there is any scope for the proposed solar farm in this location, due to the potential for harm to the significance and setting of several heritage assets”.

The last point is this. Are we being NIMBY’s? What about climate change? Well, we do need to increase the availability of renewable energy, but not at any cost. Government policy does not demand this; neither does local development plan policy. We are not required to cast aside all those things which we have cherished and held dear and protected for decades. Indeed, the Babergh Local Plan adopted less than 2 months ago (after detailed examination by expert Inspectors) requires, where harm to the setting of a heritage asset is found to exist, as the applicants accept here, that an applicant must demonstrate that there are no alternative sites for a proposal available within the district. Well, the applicants have submitted what they call an “Alternative Site Assessment” which concludes not only that there are no alternative sites, but that this is “the best possible site” – presumably in Babergh. Rarely can such a bold proposition have been supported on such insubstantial foundations. It is clear that this report has been produced in something of a hurry in response to the recently adopted policy.

Unfortunately, it adopts the narrowest possible criteria for its sieve exercise and I am afraid will not stand up to scrutiny either as a matter of law or on its merits. In fact, the filters it uses

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<sup>1</sup> PADS 1.3.1

are so primitive that it actually screens out the application site, which is Grade 2 BMV land on the MAFF database. There will be more on this in our objection in due course.

For those who haven't seen an industrial scale solar array on 50-100 acres, I recommend you go to see some: Parham Airfield north of Woodbridge isn't far away. Or the one beside the A14 at Stratton Hall Farm, Levington. There are sensible sites for solar on the roofs of industrial and commercial buildings, previously developed land like old aerodromes, or alongside major roads, where the environment is already sadly degraded, but not, we would say, at the very heart of the ancient parish of Bentley, ringed by its ancient woodlands and remarkable assemblage of heritage assets.

I also note that the site is also ringed by about 30 houses. Now this has meant that there are multiple offsets in an attempt to provide some sort of limited separation, leading to numerous small field parcels around the edge which will inevitably be too small for arable farming on this BMV land. So the sterilization of BMV is further magnified by the poor siting of this proposal.

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