

Dear Sirs

App: 26/00207/FUL Land at Two Mile Lane, Highnam

Proposed Solar Farm Development

This response represents the views of Highnam Parish Council (HPC) in relation to the above planning application as determined at its meeting on 21 April 2026. HPC strongly **OBJECTS** to this application on the following grounds:

- **Cumulative Impact:** The Borough Council (the Council) will be aware of App: 25/00566/FUL: 220-acre solar farm application off Lassington Lane, Highnam which is awaiting determination by the Council. In addition, a further solar farm scheme potentially extending to 360 acres at Linton Farm will be the subject of a public presentation at the end of April in the village. Presumably, an application on this site will follow shortly. In total, therefore, over 700 acres of farmland, a significant proportion of the farmable land in the village, could be covered in semi-industrial development. This will fundamentally compromise the essentially rural character of the village.

Nearby two other schemes are relevant:

24/011062/FUL Maisemore Solar Farm, Persh Lane, Maisemore. Construction on this site is well underway and is clearly visible from Highnam village, and

P0265/22/FUL -Highleadon Solar Farm scheme. Construction at this site is now nearing completion.

HPC would strongly urge the Council to give full regard to the totality and cumulative impact of all of these schemes in determining this application, indeed, we would suggest it would be prudent for such determination to be delayed until such time as the Linton Farm application has been submitted in order that a holistic approach can be taken to ensure the village is not overwhelmed by such development.

We would also urge the Council to critically scrutinise the appeal decision of the Forest of Dean District Council in its refusal of consent for a solar farm development at Murrells End Farm (ref: App: P1615/W/23/3329458) on the grounds of over provision stating the county is in danger of becoming “solarshire”. In other words, there is a real risk of solar farm saturation in this locality unless strong effective measures are taken to keep this under control. In addition, a dismissal at appeal of a scheme on Land north of Stream Lane, Upleadon (Ref: App:/P/1615/W/23/331416) on similar ground should be taken into account.

We would also draw attention to a recent refusal of consent by Wiltshire Council on a 50-acre solar farm scheme at Whistle Mead, Little Chalfield, Melksham on the grounds of adverse cumulative impact. Clearly, cumulative impact and the plethora of schemes in a given locality are being given significant weight in the decision-making process by Planning Authorities and the precedents cited together with others nationally which have been refused on similar grounds should be a major issue for the Council to take into account.

- **Loss of Best and Most Versatile Land:** Approximately 18 acres of this site are either Grade 2 or Grade 3a classified agricultural land. The loss of such productive farm land is not acceptable and, at the very least, this land should be excluded from any future development and retained for long term food production purposes. The Borough Council's relevant policy, ENV Solar Farms states – *“Where the proposed use of agricultural land is shown to be necessary priority will be given to poorer quality agricultural land. Proposals on the best and most versatile agricultural land will only be permitted where there is compelling evidence to justify it. Such schemes should have no unacceptable impact on the landscape and visual amenity of the locality.”*

Highnam's made Neighbourhood Development Plan 2011 2031 states: *“Highnam wishes to maintain its character as a self-contained community where people of all ages can enjoy a good quality of life. To achieve this the NDP includes amongst others the following objectives:*

1. *Ensures development reflects the nature, character, scale and density of the community.*
2. *Maintains its relationship with its landscape setting.*

The JCS Policy SD6 Landscape states: *All development must, through sensitive design, setting and landscaping be appropriate to and integrated into the existing landscape.”*

In all respects this scheme manifestly fails to comply with these policies so on these grounds this application should be refused.

- **Adjacency to Highnam Woods:** -This site lies immediately adjoining the RSPB owned woodlands. This proposal would create unacceptable levels of light glare pollution potentially compromising the carefully nurtured wildlife habitation within the woods.
- **Adjacency to Highnam Court and Parkland:** This development will be clearly visible from this iconic Listed building. We would urge the Council to give full weight to the potentially adverse impact this would have on its setting.
- **Cabling:** -We note that the provision of power cabling to connect the site to the Castlemeads power station along the A40 does not form part of this application. This is a significant omission. We would urge the Council to delay determining this application until details of this have been submitted. We are though particularly concerned about the risk of severe road congestion and disruption along the already heavily trafficked A40 road whilst this cabling is laid. Appropriate mitigation provisions are required to minimise such disruption. We would also suggest that the Council very carefully scrutinise the commercial viability of this scheme and its prospects for actual delivery given the likely significant cost of making this connection.

- **Previous Scheme:** - The applicants make great play of the precedent set by a previously approved scheme at appeal in 2017 (App: 15/00410/FUL) on this site to justify this proposal. However, the previously approved scheme was for a much smaller site so we would contend there are significant differences in terms of both scale and impact.
- **Temporary Construction:** It is intended that this scheme will have an operational life of 45 years following which it will be dismantled and the land restored to agricultural use. Possibly though, at the end of this period consent could be sought to extend its life. Clearly, this development cannot in any shape of form be categorised as temporary lasting as it would for several generations. As the land will be largely denied essential sunlight and proper land husbandry for the duration of this scheme, we would expect its future productive potential to be severely compromised.
- **National Planning Policy Guidance:** This encourages first consideration be given to previously developed or non-agricultural land if possible. However, if greenfield land is preferred only lower grade agricultural land should be approved. Clearly, higher grade (2 and 3b) is included within this application so should be excluded on these grounds.
- **Highway Considerations:** - The junction of Two Mile Lane and the A40 is already a dangerous one as visibility westwards towards the brow of the hill is poor. This danger would be significantly exacerbated by the numerous (70 -80 vehicles per week during construction) HGV lorries turning into and out of the Lane which will be delivering material to the site during the construction period. HPC have noted with concern the response from Gloucestershire Highways which would require improvements to be made to roadside visibility; the need for weight restrictions to be applied along the Lane up to the point of access to the site; and the need for the Site Construction Management Plan to be more rigorously developed to address these and related concerns.
- **Statutory Bodies and Other Key Responses:** - HPC would direct the Council to give due regard to and sufficient weight to the following observations already made:

TBC Conservation Officer: "The scheme will cause low level and less than substantial harm to the setting of the church and Highnam Court and Parkland. As such, the proposal is contrary to the relevant local and national heritage policies quoted."

Gloucestershire Wildlife Trust: - "Measures are positive but do not fully remove concerns that the development may still place undue pressure on the wood edge ecological network, especially bats. This scheme requires a more precautionary layout and the imposition of strict mitigation conditions."

Flood Risk: - Although the land is classified as Zone 1 Flood Risk, therefore of lower concern, HPC would point out that Two Mile Land regularly floods; and there is insufficient drainage capacity to cope with the increasing fast flow off the solar panels during heavy rain.

- **Residents in Two Mile Lane:** - There are a number of dwelling houses situated off Two Mile Lane whose views and quiet enjoyment will be adversely affected by this proposal. The Council are urged to give due regard to their concerns in determining this application.
- **Community Benefits Scheme:** - Without prejudice to HPC's objection to this scheme, we will pursue in parallel negotiations with the scheme promoters to secure community benefits commensurate with others secured across the UK. Whilst appreciating this is a separate matter from planning, we would seek support from the Borough Council in this endeavour.
- **Representation:** - HPC would request that the planning committee visit this site to assess its likely impact. We would also ask that this application is determined by committee rather than under delegated powers to officers. We would also seek the right to make representations at planning committee to set out our position on this proposal.
- **In Conclusion:** HPC would argue that the planning balance has not been positively addressed as the benefits of the proposed development are outweighed by its adverse impact. In summary, the scheme lacks compliance with the JCS, TBC Local Plan and the Highnam NDP so on these grounds, in addition to the other concerns set out in this response, the application should be refused.

Yours Faithfully

Cllr Charlie Coats

Chair: Highnam Parish Council