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6 April 2015

Dear Mr Logan

Re Planning Application - 15/00444/MAF Proposed Solar Farm
Wood Road/Dungee Road, Harrold

CPRE Bedfordshire generally supports local renewable energy projects with community involvement but on this occasion we find that we must object to the proposal on the following grounds:

- **Agricultural Land Classification:** The solar farm is proposed to be built on land classified as Grade 3a - defined as the "best and most versatile" agricultural land.
- **Visual Impact of the proposed development on the landscape:** The proposed site is on sloping, elevated land which will be visible over considerable distances and from very sensitive locations.
- **The cumulative effect of large scale renewable energy developments (solar farms and wind turbines) in this area of North Bedfordshire**

1. **Agricultural Land Classification (ALC)**

The applicant has provided an Agricultural Land Classification Report that classifies the land as being Grade 3a – this is defined as "the best and most versatile land" in the NPPF Annex 2.

The very latest **Planning Practice Guidance – Renewable and Low Carbon Energy** (**up-dated 27th March 2015**) from the Government regarding the siting of large scale solar farms on green-field sites para number 013 states:

"…..where a proposal involves green-field land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays. **See also a speech by the Minister for Energy and Climate Change, the Rt Hon Gregory Barker MP, to the solar PV industry on 25 April 2013 and written Ministerial statement - Solar Energy: protecting the local and global environment - made on 25th March 2015"**

In the speech referred to above Mr Barker states **"… and for larger deployments brownfield land should always be preferred".**
He goes on to say **"…in other parts of the country, solar has been installed on disused airfields, degraded soil and former industrial sites. This is the model for future solar projects"**. This site is none of those areas.
And again **"… we will do our best to spread examples of best practice, focusing deployment on buildings and brown-field land – not on green-field."**

The Ministerial Statement made just a week or so ago on the 25th March 2015 by the DCLG and the Rt Hon Eric Pickles MP regarding solar farms, said:

"……..We are encouraged by the impact the guidance is having but do appreciate the continuing concerns, not least those raised in this House, about the unjustified use of high quality agricultural land.
In light of these concerns we want it to be clear that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence."

This statement further emphasises the government's objective to site solar farms on brownfield sites, the roofs of buildings and agricultural land Grades 3b, 4 and 5 – it could not be clearer!

Grade 3a agricultural land should not be used for large scale solar farms unless in the most compelling of situations and this is not a compelling situation.

The applicant argues throughout the application in various documents that this site has the lowest agricultural grade of land available in the area (i.e. Grade 3a) and that therefore it should be used for the solar farm but fails to provide any hard evidence for these arguments.
In order to determine the Agricultural Land Classification of any land in the area a full and detailed ALC Survey of the land in question by a soil scientist would have to be undertaken as recommended by **Natural England Technical Information Note: TIN049** - it is not sufficient to rely simply on general data from the "Magic" website or other mapping systems.
As Natural England states (see page 2 of TIN 049), these maps provide no more than a very generalised picture of ALC and should be used for guidance only. Moreover, the maps are based on old data and they only show ALC Grade 3 and crucially, do not differentiate between Grades 3a and 3b.

There are also a large number of brownfield sites in the area including redundant airfields and ex-military sites which could **and indeed are currently being developed as solar farms (e.g. Chelveston)**. The applicant dismisses a wide range of brownfield sites as being inappropriate but again, without detailed analysis of the site and the soils these claims are completely unfounded.

The applicant also fails to mention the very large number of roofs of warehouses and other commercial buildings in Bedford Borough. **These are now becoming the preferred location for solar farms as stated in the Government's Solar Strategy Part 2. Further reinforced in the last few weeks by the Ministerial Statement on the 25th March 2015 by the DCLG (Eric Pickles MP) and now incorporated into Planning Practice Guidance (see page 1) which states:**

"…..My department supported this by consulting on **reforms to permitted development rights which will encourage the take up of much larger scale solar**

power generation (solar photovoltaic) on non-domestic buildings and complement the existing flexibilities for home owners. These reforms allow for a 20-fold increase in the amount of solar that can go onto the roofs of non-domestic buildings such as warehouses and offices without having to submit a full planning application, subject to strict safeguards to protect local amenity. The proposals have been widely welcomed by the solar industry, and the measure will come into force from 15 April 2015…." This is just a matter of a few days away!

These options are not considered by the applicant.

The importance of maintaining land for agricultural use cannot be overstated. Recent academic reports have predicted that as a country, due to population growth, land required for agricultural use will be exhausted by 2030 unless positive steps are taken to preserve and enhance it.

The proposed solar farm would remain in place for 25 years i.e. until 2040 at the very least.
Industrial scale solar farms developed on "the best and most versatile" agricultural land are now quite rightly recognised as being extremely wasteful of our valuable and limited natural resources.

2. **Visual impact of the proposed development on the landscape**

The proposed location of the industrial scale solar farm is a green field site in the Hinwick Wooded Wolds. The area is defined in the **Bedford Borough Landscape Character Assessment** as a largely rural area of very high sensitivity to development.

According to the Landscape Character assessment:

Key features of the landscape are:
2A.1.19 "The tranquil, rural nature of the landscape ……."

Visual sensitivities are:

2A.1.20 "Occasional views across the River Ouse Valley e.g. from south facing slopes west of Sharnbrook"

The Landscape Strategy for the area is determined as:

"The overall landscape strategy for the Hinwick Wooded Wolds character area is <u>to conserve</u> the rural landscape of rolling arable farmland ……."

The Development Guidelines are:
2A.1.35 Conserve the largely unsettled slopes above the Great Ouse Valley that form a rural backdrop to this lower lying more settled landscape

The proposed site has a very steep gradient running from the South East at 67m AOD to the North West at 82m AOD - a difference of 15m. So, from the lowest part of the site to the top of the highest of the solar panels is **a height difference of approximately 17m (55ft) – the height of a 4 storey block of flats!**
At the same time the site also rises from the north east edge alongside Dungee Road to the hedge border on the south western side of the site. This makes it particularly visible from the road as it descends the hill from the junction with the White Lane BOAT.

Road users descending the hill at viewpoint 1 will be confronted by a 15m high wall of black solar panels. Walkers will also have the same view when using the verge to make the link from the end of White Lane to the footpath (FP4) at the bottom of the hill that leads to Harrold. The rural nature of the road will be completely transformed and the view blighted! (See photographs in Appendix 1). This is contrary to the Landscape Character Assessment 2A.1.30

This together with the fact that the site lies in a slight valley on the edge of Dungee Road means that it is easily visible from sensitive viewpoints from the North West corner of the site viewpoint location 6b, through 7, 8, 9, 10, 2 and 1. In other words, the site will be visible through an arc in excess of 180 degrees from the North West through the East to the South.
This is an extraordinarily high degree of impact and from some of the viewpoints e.g. 1 and 6b, views cover almost the entire site.
It is generally recognised good practice that solar farms should be constructed on flat land which is not overlooked and can be easily screened from view. With such a steep gradient and the fact that the site can be viewed from sensitive locations some of which are elevated above the site e.g. VP9 from the historic White Lane BOAT an extremely import ancient byway. This site is in an unacceptable location.

The whole of this valley area alongside the road and opposite Odell Great Wood, a unique SSSI of great importance, is an area of high sensitivity to development. Odell Great Wood is already suffering from the impact of a major solar farm (over 100acres) being constructed on its northern edge.
If this development goes ahead the setting of this great and beautiful wood – the largest SSI in the Borough, will be irreparably damaged. Views from the historically important BOATS surrounding it to the north (Yelnow Lane) and east (White Lane) will plagued by intermittent views of industrial scale solar farm developments.

Walkers taking the popular Harrold - Odell circular walk identified on the applicant's maps, will be shocked by the industrialisation of the landscape as they enter the site by the footpath at the north western corner of the site – viewpoint 6b (see photographs in Appendix 1).
They will be confronted by steel fences and hundreds of solar panels – their views to the south and south east across the Ouse Valley and to the east across to Odell Great Wood will be blighted.
It is precisely these views that Development Guidelines in the Landscape Character Assessment state should be conserved (see 2A.1.35)

BRE, the industry body of for solar construction companies, state in their document **Planning Guidance for the Development of Large Scale Ground Mounted Solar PV Systems - page 14.**

"Developers may be attracted to southerly sloping sites, where solar gain is greatest. However such sites may be of high agricultural value and are likely to be more visible within the wider landscape".
This is precisely the situation with this site and the Government in their Solar Strategy Part 2 encourages developers to follow BRE Guidance when constructing solar farms.

The applicant has conceded that the site can be viewed from a wide range of viewpoints but considers that screening can be used to mitigate the most serious problems.
No amount of screening will disguise a solar farm on such a substantial gradient (15m) and even in the best case scenario they present - after 15years of maturity and with

trees and hedges in full leaf, the site still cannot be screened from sensitive viewpoints. The situation will clearly be substantially worse for the 6 months of autumn and winter after leaf fall.

All the photographs in the applicants Landscape and Visual Appraisal are taken with the trees in full leaf.
It should be recognised that this is the situation for just 6 months of the year!

Photographs in Appendix 1 show the site from viewpoint 1 taken a few days ago from the left hand side of the road (from where car drivers will view the site). Without leaves on the trees the full area of the site can be easily seen. Contrast this with the applicant's photograph which shows only a part of the site.
It is quite clear that from this location the solar farm will be a dramatic industrial intrusion into an otherwise tranquil rural environment.

Destroying the tranquillity of an area is contrary to NPPF para 123. It is accepted that tranquillity is not just related to noise but also to the "feeling" of tranquillity induced by a particular landscape for example – this can be easily destroyed by the introduction of an "industrial" feature such as a large scale solar farm into an otherwise rural view. This area of Bedfordshire is one of the more tranquil areas of the county as recognised by the "CPRE tranquillity map". **Tranquillity is also a noted feature of the area in the Landscape Character Assessment 2A.1.19.**

The Assessment also notes (2A.1.30) - "Conserve the character of the rural roads ……..and limit urbanising influences"

These issues of visual impact are also covered by **Natural England in their Technical Information Note TIN101 - Solar parks: maximising environmental benefits.**

Their chart on Page 6 details landscape character factors which influence the siting of large scale solar farms.

Areas where Natural England advise that solar farms <u>should not be sited are</u>:

- **"Strong inter-visibility with sensitive landscapes. Forms an important part of a view from sensitive viewpoints"**

- **"Absence of modern development, presence of small scale, historic or vernacular settlement, roads and tracks"**

<u>The proposed area for the solar farm is precisely in this sort of landscape and for this reason alone the application should be refused permission.</u>

3. **Cumulative impact of large scale solar farms and wind turbines in this area of North Bedfordshire**

Many walkers use the circular route from Sharnbrook to Little Odell using the Yelnow Lane and White Lane BOAT's and then to Harrold Country Park or to Odell returning to Sharnbrook using the Ouse Valley Way.
Using the Yelnow Lane BOAT, walkers will be confronted with intermittent views of the huge solar farm at Odell Glebe (currently under construction) and the 3 enormous (127m) wind turbines (planning permission given) to be constructed on land adjacent to the Odell Glebe Solar Farm.

In addition to the turbines, they will then also see this proposed solar farm, if approved, at various points along the White Lane BOAT of which viewpoint 9 will be only one of many.
Depending on the final route chosen it and the turbines will also be an intrusion in the landscape from Footpaths FP22 and FP15 including at their junction – viewpoint 10.

These walks take in some of the most tranquil and most beautiful rural parts of North Bedfordshire with outstanding, largely unsettled landscapes **and the Development Guidelines in the Borough's Landscape Character Assessment calls for them to be conserved (see 2A.1.35).**

Planning Practice Guidance states that cumulative impact of renewable energy developments can be a problem when:
"….sequential effects on visibility occur when an observer moves through a landscape and sees two or more schemes……"

If this scheme is approved, we believe that the sequential effect on visibility will be substantial and unjustified in a landscape that should be conserved not industrialised.

Community involvement in the proposed solar farm

As stated at the beginning of this letter, CPRE Bedfordshire encourages and supports community led ventures of all sorts.
For example, we are very proud of our **Living Countryside Awards** which are held annually and recognise the amazing work done by enthusiastic local people (Parish Councils, individuals and businesses) across Bedfordshire to improve and enhance their local environment in so many ways (go to www.cprebeds.org.uk for details).

In this instance the applicant cites community benefit as one significant reason that this application should be allowed. It will, they say, provide financial support to the community of Harrold Village.

But, the important issues of land use and the protection of our important rural landscapes raised by this application are of great importance to, and impact upon, the wider community and not just the community of Harrold.
In our view this proposed solar farm is quite simply in the wrong place.

Local Authority support of renewable energy projects with community involvement should not come at any price!

These types of rural, largely unsettled landscapes are at risk across the county and they need to be conserved and protected for future generations as recognised by the Borough Council's Landscape Character Assessment for this area.

Yours sincerely

Gerry Sansom
CPRE Bedfordshire

APPENDIX 1 Photographs – Harrold Solar Farm, Dungee Road

Picture taken from Viewpoint 1 Right hand side of Dungee Road. Date 1st April 2015 – trees not in leaf. Approx 70% of the site can be seen.

Picture taken from Viewpoint 1. Left hand side of Dungee Road. Date 1st April 2015 – trees not in leaf. Approx 80% of the site (including through the trees) can been seen

Picture taken from Viewpoint 6b on footpath FP22 looking south east across site to Odell Great Wood – view will be obliterated by fences and solar panels. Date 1st April 2015 – no trees in leaf.

Picture taken from point 20m north east of viewpoint 6b on FP22 along hedge line. Looking SSE across site to Ouse valley - view will be total obliterated by fences and solar panels. Date 1st April 2015 – no trees in leaf.

Picture taken from viewpoint 6b on FP 22 looking north east across site and across Dungee Road and valley to Odell Great Wood. Date 1st April 2015 no trees in leaf – view will be totally obliterated by fences and solar panels.