

**Reply to: 38 Harrow Road,  
LEIGHTON BUZZARD,  
Beds., LU7 4UQ**

Abel Bunu,  
Development Management,  
Central Bedfordshire Council,  
Priory House, Monks Walk,  
Chicksands,  
SHEFFORD, SG17 5TQ

14<sup>th</sup> November 2014

Dear Mr. Bunu,

**Application CB/14/04064 – Land at Millfield Farm, Caddington:  
Installation of 4.99MW Solar Farm and associated infrastructure**

Having studied the documentation submitted by the applicant in this matter, and having visited the site, CPRE has concluded that it must register objection to this proposal.

The scheme is described as ‘Millfield 2’, and involves some 9.3 hectares of land lying on the west side of Millfield Lane. The site is not only within the Southern Bedfordshire Green Belt but also lies within the boundary of the Chilterns AONB.

As you will be aware, CPRE did not object to ‘Millfield 1’ when this was submitted in 2011. Although Millfield 1 also lies within the Green Belt, the site was considered to be relatively well screened, and to involve relatively little harm to the Green Belt’s openness or adverse impact on either the immediate or wider landscape. We therefore considered that, given the NPPF’s identification of contribution to national renewable energy targets as a ‘very special circumstance’ – potentially outweighing the harm to Green Belts from otherwise inappropriate development - the case for Millfield 1 had been sufficiently made.

‘Millfield 2’ is an entirely different matter. Though fairly well screened from Millfield Lane itself, the site lies in a much more open Green Belt landscape, one which is also deemed to be of sufficient quality to be included within a nationally-designated AONB. We also note that of the 7.6 hectares of Class 3 agricultural land included within the overall site area, 3.2 hectares (42%) is in the higher quality category of Class 3(a).

We submit, therefore, that the location of this proposal is unacceptable in terms of

- (a) Green Belt and AONB policies
- (b) Landscape impact
- (c) Agricultural implications

Our detailed arguments are as follows:-

### **(a) Green Belt and AONB policies**

Although the NPPF at Para. 91 does envisage that the contribution made to renewable energy targets may constitute a case of ‘very special circumstances’, sufficient to outweigh harm to a Green Belt’s openness, this has to be viewed against

- (i) the degree of such harm involved in the particular case concerned and
- (ii) the declining level of Government support for ‘on-the-ground’ solar installations, as evidenced by the forthcoming cut in subsidies for such installations.

Because of the relatively open nature of the landscape that Millfield 2 would occupy, the level of harm caused to the openness of the Green Belt by it would by definition be substantial. Moreover, there is also the question of Millfield 2’s cumulative impact on the Green Belt in the vicinity. If one adds the 9.3 hectares of Millfield 2 to the 11.4 hectares of Millfield 1, a total of 20.7 hectares of Green Belt in the Millfield Lane area would be covered in solar panels.

Given the considerable harm caused to the GB’s openness by Millfield 2, even on its own, we say that after taking into account its cumulative impact together with Millfield 1, a case of ‘very special circumstances’ for Millfield 2 sufficient to outweigh the overall level of harm caused to the GB cannot be substantiated, especially against the background of a reducing level of Government support for solar farms in general.

Over and above Green Belt considerations, it is necessary to consider policy relating to AONBs. For these special areas, the NPPF at Para. 116 states:

*‘Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest’.*

We submit that neither the test of ‘exceptional’ circumstances – a higher test level than ‘very special’ – nor the test of ‘public interest’ can conceivably be met here. Convenient proximity to a Grid line does not represent an ‘exceptional’ circumstance, while the Government has already determined that the ‘public interest’ no longer lies in providing the present level of support for ground-based solar installations, but in reducing the level of taxpayer subsidy made available for them.

We note that the applicant suggests the existing presence of the overhead Grid line is a feature which already compromises the quality of the AONB in this location. We would point out that the area was included within the AONB notwithstanding the presence of the Grid line, and that its presence is certainly no reason for introducing any further intrusive features. Rather, it is a strong reason why they should not be.

### **(b) Landscape Impact**

The high level of protection afforded to the site area by national policy governing AONBs has already been referred to. At local level, we note that the landscape of the Chilterns AONB receives detailed consideration in the Council’s own Policy Guidance Note on

Solar Energy, where the site is encompassed within its South Chilterns Landscape Evaluation Area.

The Landscape Character Sensitivity map at Figure 4 of the PGN identifies that the Millfield 2 site lies within an area of the South Chilterns LCA that is ‘unshaded’, i.e. is ‘*assessed as having a higher degree of landscape and visual sensitivity*’ (PGN Para. 5.17). In further considering the landscape of the South Chilterns LCA, the PGN then states at Para. 5.42 (b) that ‘*The scale and openness of the Chalk Valleys limit the potential for (solar) development, as it is important to protect the integrity of these slopes*’.

We note that it is acknowledged in the applicant’s documentation that the Millfield 2 development would be visible on the crest of the A5 Chalk Valley, particularly from 5 viewpoints on the valley’s western side. Although the applicant proposes hedgerow planting to mitigate these westwards impacts, this mitigation would not be effective for at least 5 years, if even then. It seems to us clear, therefore, that were the application to be approved it would be contrary to the Council’s own policy of protection for the Chalk Valley slopes of the South Chilterns LCA.

The question of cumulative impact also arises. This aspect is covered by the Council’s Solar Energy PGN at Section 6, where Para. 6.1 states:

*‘Cumulative impact will need to be addressed if 2 or more solar farms are proposed for the same landscape area’.*

Para. 6.4 then adds:

*‘Adjacent solar farms will have the greatest cumulative impact’.*

Although Millfield 1 and Millfield 2 would not be immediately adjacent, and would not be capable of being seen simultaneously from the same viewpoint, the local footpath network traverses alongside both of these site areas. Anyone walking westwards from Caddington towards the A5 valley floor would first have to walk alongside Millfield 1, then, after a short stretch through woodland and along Millfield Lane, would immediately find themselves walking alongside Millfield 2. For the walker, therefore, there would be at least 10 minutes of exposure to solar farm installations, broken only by a few minutes between the two. The cumulative adverse impact on walkers’ enjoyment of the landscape and countryside would thus be considerable.

No effective mitigation is either proposed, or possible, against this adverse impact on users of the area’s footpath network.

### **(c) Agricultural Implications**

We note that the current agricultural usage of the site area is stated as ‘set aside’. We also note that the Council’s Solar Energy PGN, at Figure 2, identifies the land simply as of Grade 3 agricultural quality. However, the applicant’s own ‘Agricultural Land & Soil Resources’ report, at Para. 3.2.7, identifies that of the 7.6 ha. of agricultural land within the 9.2 ha. overall site area, 42% (3.2 ha.) is actually Grade 3(a).

S.4 of the Council's Solar Energy PGN requires that where Grade 3(a) land is concerned, certain additional information is required to accompany the application, as set out at Figure 1. Notably, this requires the applicant to

*'Provide information on the impact of the proposal on the area's supply of farm land of that classification; also, consider the cumulative impact of the proposed development alongside other large scale Solar PV developments on the supply of agricultural land of that classification across Central Bedfordshire'.*

We can find no evidence that the applicant has addressed this requirement, which we consider is of particular importance given the high level of solar installation applications the Council is currently receiving.

We also have concerns as to the situation regarding restoration of the site area to agricultural use after cessation of use as a solar farm. As in the case of Millfield 1, the applicant envisages a period of 25 years of use for solar generation. However, the possibility has to be considered that, for whatever reason, solar generation could cease some time prior to that date. In this context, we do not consider Condition 6 attaching to the Millfield 1 consent to be 'fit for purpose', as the requirement to clear the site and restore it for agricultural purposes is expressed purely in a 25 year context.

The possibility also has to be considered that, either before or at the end of 25 years, the operator of the site could simply go into liquidation and 'walk away'. It seems to us that the clearance and restoration of the site can only properly be secured via the deposit of a financial bond, to be forfeited if clearance and restoration does not take place.

This matter is essentially one to be addressed through 'Conditions', but the uncertainties existing around the whole issue of clearance and restoration forms yet another area of concern about this and similar applications.

## **Conclusion**

For all the reasons set out in this letter, CPRE urges most strongly that consent to this application be refused.

Yours sincerely,

T.H. Adburgham  
Area Representative, CPRE Bedfordshire