

Mr Jonathan Warner
Planning, 4th floor
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

17th July 2014

Dear Jonathan Warner

Re Planning Application 14/01333/MAF - Odell Glebe Solar farm

Thank you for your letter dated 26th June 2014 concerning the above application.

CPRE Bedfordshire regards the proposed site as one of very high sensitivity to development and strongly objects to the application for the following reasons:

1. The siting of the proposed solar generating plant will adversely effect the setting and biodiversity of 3 very important woodland areas which it will border notably:

- Odell Great Wood a 215 acre, SSSI woodland of great historic and ecological importance - a rare ash-maple woodland - the most important site in North Bedfordshire and one of very few remaining examples in South East England. In our view Odell Great Wood is one of the treasures of the Bedfordshire countryside, an asset to be protected at all cost.

- Brownage and Louse Acre Woods both of which are County Wildlife sites.

Currently, the woodlands are separated from the semi-industrialised old Podington Airfield itself and the approved but yet to be constructed, wind turbine site (application 13/00663/FUL), by good quality agricultural land and this provides an absolutely vital "buffer zone" securing both the rural setting and the biodiversity of the woodlands.

The proposed solar generating factory, over 100 acres in size with 73,000 panels, 13 inverter substations surrounded by steel fences up to 3m in height topped with security cameras, would be a massive industrialisation of this uniquely important site and severely adversely impact the settings of all the woods.

This application is contrary to NPPF 118, 2nd bullet point:

"proposed development within or outside a Site of Special Scientific Interest (either individually or in combination with other developments) should not

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normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest

And the 5th bullet point:

"planning permission should be refused for developments resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland"

Just one example of the way in which biodiversity is ensured by providing such a buffer zone is in the number of hares mentioned by the applicant as having been seen during each ecology survey visit (see applicants Environmental Report para 521). The hares are almost certainly benefitting from the food source and sanctuary provided by the nearby woods and would disappear from the site if this application were to be granted.

The Borough Council's Landscape Character Assessment for the area of the site known as the "Hinwick Wooded Wolds" makes the following comments:

"Overall the landscape character of the *Hinwick Wooded Wolds character area* is judged to be of high sensitivity due to the many elements of the landscape that are sensitive to change such as the blocks of scattered woodland....."

The importance of Odell Great Wood and the other woodland areas to biodiversity is mentioned several times in the assessment, highlighting their importance to the area.

2. The negative cumulative visual and landscape impact that will result if the application is approved due to a large number of other renewable energy schemes already approved in the immediate vicinity but not yet built.
These are:

- **3, 127m Wind Turbines and associated land** that will be immediately adjacent to the western edge of the site (application 08/02692/MAF).
- **A 50 acre 66,000 panel Industrial Scale Solar Farm on land approx 1.75km to the north east of the site**, adjacent to the Forty Foot Lane and the railway line at the "Sharnbrook Summit" (application 13/00218/MAF).
- **A number of single wind turbines in the area**, the closest of which will be a 77m turbine near to the above solar farm at Middle Farm, Back Lane (application 13/00663/FUL).

The Government's Planning Practice Guidelines relating to large scale solar farms states that the cumulative landscape and visual impact should be treated in the same way as when assessing the impact of wind turbines.

Regarding "Zones of Visual Influence".

The 5th bullet point states that "**sequential effects on visibility occur when an observer moves through a landscape and sees 2 or more schemes**".

This is certainly the case in this area with an observer walking the Forty Foot Lane and 3 Shires Way passing at least 3 very large industrial scale renewable energy installations within a distance of 2 km if this application is granted, and several smaller scale ones in addition.

There are already more than sufficient renewable energy schemes currently approved for this area - this application is one too many and the visual and landscape impacts will be total unacceptable.

3. Inadequate and incorrect Agricultural Land Classification (ALC) data for the proposed site

The applicant's Environmental Report states that the site is classified Grade 3 throughout but provides no substantiation for this claim and it is erroneous since Grade 3 is in fact, importantly, split into Grades 3a and 3b.

We note that the report makes reference to the Government's "Magic" website in references.

It also makes claims as to the soil make-up and structure (para 664) but does not explain how this information was obtained.

The Magic website provides only a rough guide to ALC and, according to Natural England document TIN 049 among others, it should be substantiated by physical auger boring at 1.2m depths at a frequency of 1 boring per hectare and calculations made based on the data obtained by a qualified soil scientist.

The applicant has not presented this data and so the very important ALC for the site is both misleading and incorrect.

We believe that the soil, which has been used to grow arable crops, on the proposed "green-field site" is in fact a mixture of Grade 2 and Grade 3a. This is the "best and most versatile agricultural land" as defined by the NPPF.

Latest "Planning Practice Guidance" from the Government regarding the siting of Large Scale Solar Farms on green-field sites has been clarified recently with the addition of the contents of a speech by Greg Barker MP Minister for Energy and Climate Change and is now:

"where a proposal involves greenfield 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."

In the speech referred to above Mr Barker states "..... And for larger deployments brown-field 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 government's recently published document UK Solar Strategy Part 2 - para 66 promotes the "Solar Trade Association - Solar Farms 10 Commitments and states:

“These best practice initiatives are important as they help address the perception that solar farms are diverting significant amounts of land from agricultural use and domestic food production.”

The first of these commitments states that:

“Solar farm developers, builders or tenants who are members of the Solar Trade Association will comply with the following best practice guidance:

- 1. We will focus on non-agricultural land or land which is of lower agricultural quality.”**

Applicants can put forward sites for development of large-scale solar farms on ALC Grades 1, 2 and 3a **but they are obliged to make a very clear justification for doing so.** This is not just our view of current NPPF and Planning Practice Guidance but also that of BRE, the Construction Industry Trust advising solar farm developers.

<http://www.bre.co.uk/podpage.jsp?id=2983>

It clearly states that: **“NPPF would not normally support development on the best agricultural land” (see appendix A below)**

The applicant has made no case whatsoever for using either Grade 2 or Grade 3a land for this large-scale solar farm.

Bedford Borough Council should be following government advice, lead by example, and encourage the use of brownfield sites and rooftops for the siting of large scale Solar Farms.

For this reason alone, the application should be refused.

- 4. The site is crossed or bordered by at least 2 historically important ancient "byways open to all traffic" (BOATS) e.g. Yelnow Lane and Forty Foot Lane**
It is estimated that these date to pre-Roman times.
These are also contain County Wildlife sites.

The views of walkers and other recreational users of the BOATS will be blighted by the industrialisation of the surrounding countryside.

These important by-ways often contain important flora and fauna some built up over many decades. The industrialisation of the agricultural land that surrounds them will adversely impact on the biodiversity of the BOATS.

The intrusion and impact of the proposed industrial scale solar farm on these important heritage assets is contrary to NPPF para's 128, 129,131,132,133.

5. Pre-application Consultation inadequate

The attempts at pre-application consultation by the applicant have been pitiful to say the least. We attended the exhibition in Odell Village Hall and the details available were minimal and not at all representative of how the site would look when completed with the 3m high steel fences and security cameras omitted from all drawings and plans. No computer generated images of how the site would look when completed were available.

No invitations were sent to CPRE or any other interested environmental organisation in the county that we are aware of. This despite the fact that the proposed development would impact on the Odell Great Wood SSSI site.

Not surprising then that a miserly 47 people were estimated to have attended the event (Environmental Report para 39).

An even lower total of just 26 responded in some way or by completing a questionnaire or emailing comments.

The full detail of these questionnaires and e-mailed comments (i.e. copies of the originals) have not been made available in the applicant's application.

With a sample size of this very low magnitude no real weight can be given to this so-called consultation.

6. Application lacks very important detail

By separate e-mail we have asked you for the following information from the applicant regarding the Environmental Report:

A. Section 7.6 Field Survey Results para 513 states that the application site was visited by an experienced ecologist on the 24th March.

Please could we see a copy of this persons full written report(s) and his/her personal details e.g. name, full qualifications and educational background in order to verify his/her competence as an ecologist and the organisation for whom he/she works etc?

B. Section 7.7 Breeding Bird Survey states that surveys were carried out in March, April, May and June.

Please could we see a copy of this persons full written report(s) and his/her personal details e.g. name, full qualifications and educational background in order to verify his/her competence as an ornithologist and the organisation for whom he/she works etc?

C. Section 1.7 Pre-Application Consultation

We would like to see copies of the original feedback forms and all electronic comments (e.g. emails) following the pre-application consultation described in the applicants Environmental Report - could you please obtain these for us from the applicant?

We understand that there have been a total of 26 comments is this correct?

Finally, CPRE Bedfordshire has visited the proposed site and seen the wonderful hares cavorting in the fields mentioned by the "Ecology Expert" in the Environmental Report.

It would be nothing less than an absolute tragedy if this application were to be approved. The setting and biodiversity of the rare and beautiful Odell Great Wood will be severely damaged. The other important woodlands and ancient by-ways seriously adversely effected by this unsustainable and unnecessary proposed industrialisation of our precious countryside.

**Gerry Sansom
For CPRE Bedfordshire**

Appendix A

BRE National Solar Centre Planning Guidance for the development of solar PV and Solar Thermal Systems

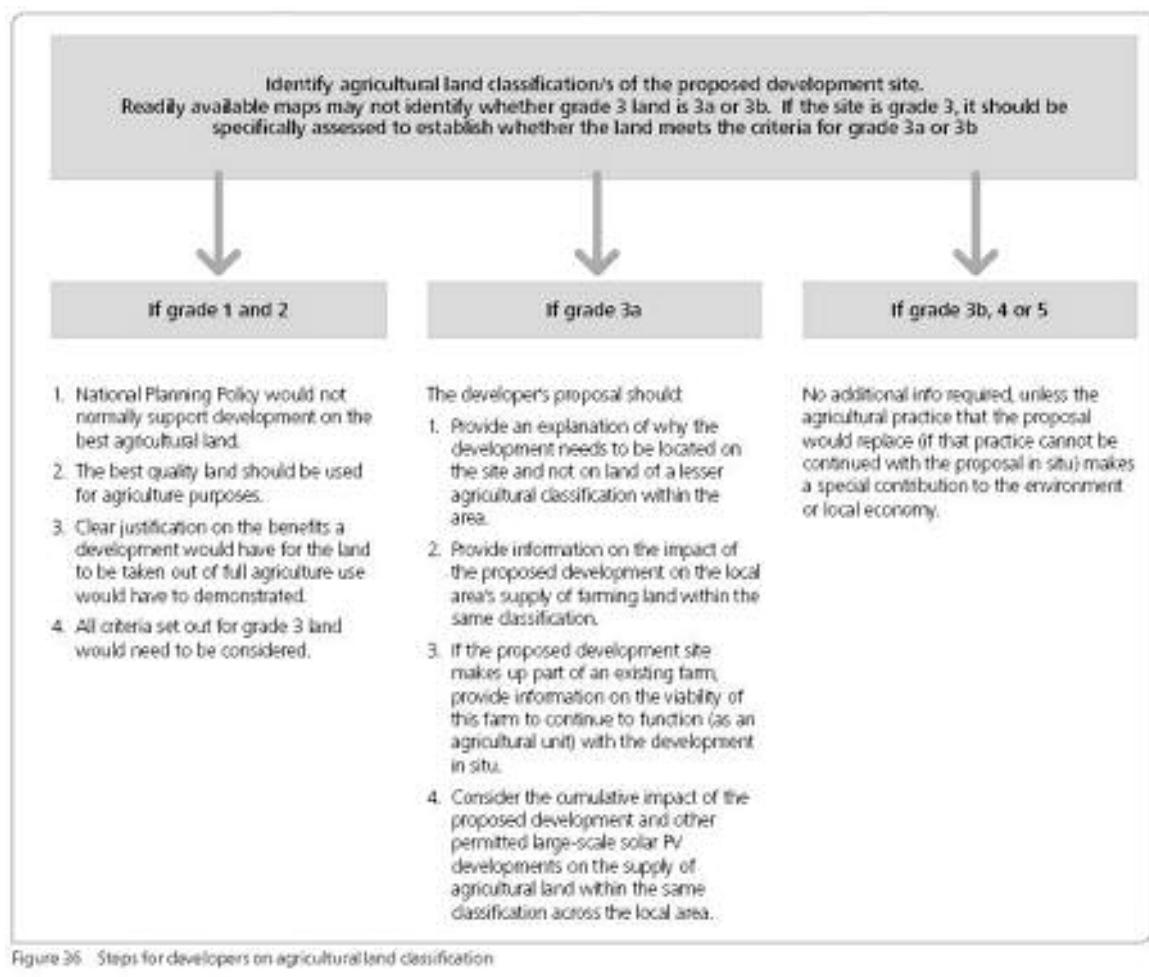


Figure 36: Steps for developers on agricultural land classification