



The countryside charity  
Somerset

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For: Somerset West and Taunton DC  
Planning Team/ Mrs K. Wray, Case Officer

25 November, 2022

Dear Sirs,

23/22/0028-solar farm, North Preston farm, Land N. of Preston Bower

CPRE Somerset wishes to OBJECT to this planning application:

**1. Non-provision of an Agricultural Land Classification report showing percentage of the site which is Best and Most Versatile Agricultural land [ BMV land ]**

We understand this land to be highly productive BMV land, graded 1, 2 and 3a. There was a written ministerial statement ( WMS ) 25.3.15 stating that any proposal for a solar farm on BMV agricultural land ' *would need to be justified by the most compelling evidence* '. No such evidence has been presented in this case.

Current government Planning Practice Guidance on Renewable and Low Carbon Energy ( PPG ) encourages the effective use of land by focussing large scale solar farms on previously developed land and non-agricultural land; furthermore, this guidance requires the LPA to consider whether the proposed use of any agricultural land has been ' *shown to be necessary and poor quality land has been used in preference to higher quality land* ' - no such evidence has been submitted with this planning application.

At the Environmental Select Committee in June 2022 George Eustice, the then environment secretary, stated that there is a ' *strong presumption* ' against the use of BMV land, and expressed his concerns that some LPAs were ignoring government policy.

According to recent press reports, the government is now looking to redefine land categories to curb the development of solar power on the middling-low category 3b land, which represents around 29% of agricultural land. [ Times newspaper, Oct 11, 2022/ Guardian newspaper Nov 17 ,2022]. Food security is now a critical issue for our country and we must start by ensuring that valuable farmland is protected.

As stated in the Times newspaper 13.10. 22 by Mike Alder, Emeritus professor of rural environment, who has welcomed the initiative to redefine BMV land to include 3b: *' Energy security can be achieved without compromising food production. Solar energy has many potential sites, including commercial roof space, brownfield sites and some poorer -grade land '*.

This planning application does not include an Agricultural Land Classification report. At present the local community, the case officer, the planning committee, and the public therefore lacks key information relevant to its determination.

## **2. Deficiencies in the Applicant's Landscape and Impact Appraisal [ LVIA ]**

Based on our observations on our recent site visit to Halse, in good weather with good visibility, the Applicant's LVIA significantly understates the scale and magnitude of the effects of this proposal on the landscape, and also significantly understates the impacts on walkers using the public footpath which passes right through the site on the picturesque walk between Halse and Milverton.

The photo viewpoints depart from usual practice in not showing vertical lines on each image denoting the extent of the solar farm in the field of vision.

The LVIA is deficient in that the two volume document does not follow a key principle advised in the Landscape Institute's *'Guidelines for Landscape and Visual Impact Assessment '*, Third edition, [GLVIA ] at 3.27: *'Numerical scoring or weighting of criteria should be avoided, or at least treated with caution, since it can suggest a spurious level of precision in the judgments, and encourage inappropriate mathematical combining of scores'* . In our view the LVIA submitted by the applicant contains a large number of subjective judgments, which are given a spurious level of precision by combining large numbers of tables into a near incomprehensible *' process '*. \*

\* For example, in our opinion Para 428- Magnitude of Effect in the LVIA is a classic example of an adopted approach and methodology which is unhelpful to readers and not appropriate to the task in hand. It reads as follows: *' By combining the sensitivity ( or nature) of receptor ( Table 1 or Table 2 ) with the magnitude of change ( nature of effect ) (combination of Tables 3,4 and the duration of effect) the significance of impact is determined. Having taken such a wide range of factors into account when using sensitivity and magnitude at each receptor, the magnitude of effect can be derived by combining the sensitivity and magnitude in accordance with a matrix. This process is recorded in Table 5.'* ' Table 5 : Degrees of Landscape or Visual Amenity Impact Magnitude and Significance ' is then shown on p. 61. It

consists of a large grid containing a large number of random words, with no references or explanation as to use.

Further features of the report giving rise to confusion includes para 428 on p. 60, which is then followed by a paragraph numbered 479, with no explanation given to explain the missing text.

The language used at key places is incomprehensible, or nearly so eg para 127 : *' The Quantock Fringes and West Vale is judged to be of medium susceptibility, whereby whilst undue consequences may arise within the rural farmland area ' [ sic ]*.

Reference is made at Para 113 to Zone of Theoretical Visibility analysis [ ZTV ] but we were unable to locate this analysis in the submitted Vols 1 and 2 of this document.

There are internal contradictions in the report which diminish confidence in its overall conclusions that impacts are low. For example, para 102 states that *' long range views are infrequent and not a characteristic afforded from many footpath users ' [ sic ]* but this is contradicted by the viewpoint photos which clearly show that the proposed development site is located on high ground with far reaching long distance views from multiple points on the public footpath [ eg Viewpoints 5b and 6 ].

At para 134 the LVIA states that *' views through the landscape are not formally noted in the LCA'* but in fact the relevant Quantock Fringes and West Vale LCA states: *'At the foothills of the Quantocks, this character area is defined by sloping undulating ground and the hills beyond provide a strong backdrop'*. On our site visit, we noted that there are indeed far-reaching views from multiple viewpoints on the site extending across undulating countryside to the backdrop of both the Quantocks and Blackdown hills.

### **3. The effects on walkers on the PRow passing the site**

We disagree with the LVIA that the effects on walkers will be ' minor ' etc. In fact, numerous appeal decisions describe walkers as having the highest susceptibility to change. If this proposal were to be approved, the superb open views from the high ground of the site will be blocked by the panels for a long distance along the public footpath [ T13/10-WG7/29 ], thereby denying walkers the enjoyment of the landscape at the highest point of the walk.

### **4. Cumulative Impacts**

As detailed in the LVIA, there are growing cumulative impacts in this area from the presence of at least 10 solar farms within a 10 km radius - Grange Farm ( 5MW ), Sand Hill farm ( 2MW ), New Penny farm ( 4MW ), Monty's farm ( 5MW ), Sandys Moor ( 2.9MW ), Grove farm ( 3.5MW ), Tonedale farm (5MW), Lower Marsh (5MW ), Red Hill (4.8MW ), and Halse Solar

farm itself within 2km of the site ( 8.24MW ). These solar farms may not be ‘inter- visible’, but the effect of an excessive number of solar farms is that the character of the area begins to change and lose its rural identity, as is now happening in this area. This growing trend is especially concerning given the proximity of Halse to Taunton. It is essential to conserve rural character and identity on the fringes of the town, as the surrounding countryside acts as the town’s ‘green lungs’ .

## **5. NPPF 2021**

In our view the proposal is not compliant with NPPF 2021 paras 155 and 158, nor with the Local Plan. The visual impacts cannot be addressed satisfactorily, because the site is in a prominent landscape position on high ground. Photo Viewpoint 4- Photo-Montage confirms that the visual sensitivity of the site is high and that there will be a total change of landscape character. The panels, transformer buildings, security fencing and cameras on poles will change the character of the land from entirely rural and remote to an industrialised landscape, spoiling the picturesque walk from Halse to Milverton. The panels will block far-reaching views from the footpath, whilst the proposed landscaping would further change the open aspect of the site.

## **6. Effect on the setting of the conservation area**

The setting of the Halse conservation area is the land surrounding the village, from which the village can be experienced ( NPPF Glossary definition of ‘setting’). The setting is entirely rural, but if this application were to be approved, the village will be approached from the south along the public footpath through a tunnel of panels. Viewed from the village, the development will resemble a forest of scaffolding poles, backed by panels, as the panels will face southwards away from the village. This will detract from the heritage significance of the historic village, which derives its significance as much from its entirely rural setting ( which is little changed over centuries ) as from the intrinsic quality and architectural features of its historic buildings.

Yours sincerely,

Fletcher Robinson MSc Planning  
Trustee and Planner  
CPRE Somerset

