



The countryside charity
Somerset

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South Somerset District Council
FAO Catherine Miller-Bassi, Case Officer

18 November 2022

Dear Sirs,

21/00701/FUL- land at Pipplepen Farm, North Perrott, Crewkerne- ground-mounted solar farm/ substation/ inverter buildings/ security fencing/ cameras on poles

Both CPRE Somerset and CPRE West Dorset have objected to this planning application on the grounds of harm to the setting of the adjacent Dorset AONB; the adverse impacts on walkers on three public footpaths, including the important adjacent Parrott Trail [Y19/14], from which there will be close-up views of the panels for at least 300m; and harm to the setting of heritage assets.

We now wish to comment further on the most recent landscaping plans, and on the government's current guidance regarding the importance of avoiding solar farms on Best and Most Versatile agricultural land.

Lack of evidence regarding the extent of higher grade BMV agricultural land on the site

1. Government guidance, and also NPPF and BRE guidance, seek to protect Best and Most Versatile Land from use for solar farms. BMV land is agricultural land graded 1,2 or 3a according to MAFF ALC guidelines 1988.
2. The Government is currently considering whether to extend BMV land to include 3b, the middling-low category, which accounts for around 29% of all agricultural land. Food security is now considered critical, particularly in a time of inflation and food shortages. George Eustice, Environment Secretary of State in June 2022, commented disapprovingly to the Environment Select Committee that some LPAs are ignoring government guidance to avoid productive agricultural land when approving solar farms. On 17 November 2022 the new Environment Secretary Therese Coffey reiterated in the House of Commons that brownfield sites should be prioritised for solar farms, and best agricultural land should be farmed. There is no evidence in this case that any sequential analysis has been undertaken for alternative and

more appropriate brownfield sites.

3. The Applicant's Planning Statement at Para 6.9 states that '*the application is supported by an Agricultural land Classification report*' but the Applicant's agricultural land classification report does not appear to have been posted on the planning portal and therefore is not available for public inspection. This missing report needs to be made available before the planning application can be determined, and sufficient time should be allowed before determination for its findings to be examined.
4. The Planning Statement at para 6.5 asserts that '*the land is not classified as BMV land*' but this is contradicted at para 6.10 which says: '*The site contains only a small area of BMV land, falling well below the 20ha threshold of significance used to set the limit for statutory consultation with Natural England*'. *[Footnote- it is not explained in the Planning Statement why any threshold for statutory consultation with Natural England would be relevant in the context of the classification of BMV land].
5. Whilst there is an acknowledgement by the Applicant that the BMV land on this site is '*below 20ha*', it is not stated by how much it is below 20ha. The red-lined area of the proposed development is 54 ha (Design and Access Statement Para 2.4). 20ha of BMV land would represent 37% of the site area .
6. The Planning Statement at Para 6.10 has a template paragraph for these kinds of applications in which BMV data can be inserted but the relevant data boxes have been left blank: ...' *A detailed site survey was undertaken in April 2020 which included the examination of the site. XX [sic] hard auger borings were taken across the site. The report confirms the presence of Grade 3a soils (hectares/% site area) [sic], Grade 3b soils (hectares, % site area) [sic] and Grade 4 soils (hectares ,% site area) [sic].....'* ie zero BMV data has been provided.
7. The lack of data in the planning application regarding the extent of BMV land on the proposed development site is unacceptable and must be resolved. As matters stand, the community, the planning committee and the public are uninformed on this critical issue.

Charles Potterton's most recent comments on the amended landscaping scheme

8. The Dorset AONB landscape officer has commented on the SSDC's Landscape consultant's most recent comments, and concludes that: '*notwithstanding the proposed planting a solar development of this scale will invariably lead to some notable landscape and visual impacts, particularly whilst mitigation is maturing. The Council will need to weigh these effects against the benefits of the proposal.*'

9. In our opinion following our site visit, the walk southwards from North Perrot towards the AONB traverses some of the most picturesque landscape in the County. We do not consider that the amended landscaping plans will be effective in screening the panels, central inverter stations, substation, security fencing and pole mounted cameras. Extending the width of the existing hedgerows running east-west across the site will not screen the views from higher ground, whether from the AONB to the south, or from Crondle Hill to the north, although some of the panels will be screened from some viewpoints.

10. Planting new hedging and trees along the footpath which passes north-south through the centre of the site for 570m (Y19/13) ' *in order to form a Green Lane* ' will simply block existing open views of the beautiful countryside within the setting of the AONB, and views of the AONB itself on higher ground.

11. We agree with Charles Potterton's comments 4.10.21 that ' *There is no question that all the receptors [ie walkers on the three public footpaths] are in a high bracket of sensitivity and all will experience harms* ' . We also agree with the comments of Dorset Council in its letter 1.11.21 that: ' *The landscape is characterised by a patchwork of fields, undulating topography, clusters of trees and small pockets of development. In contrast, the array will appear from many points on this footpath as an unrelenting, enveloping blanket of repetitive structures* '.

12. The new proposed 5m strip along the southern boundary is ineffective and too narrow to screen views from the AONB. As it will shade panels, it is not clear why panels have been placed so close to it. Likewise, shading by the proposed landscaping of the hedges running east-west across the site will reduce the effectiveness of panels placed to the north of them. In our view, any condition imposed for trees/hedging that will block sunlight from panels is unlikely to be enforceable.

13. We agree with Charles Potterton's comment 4.10.21 that ' *Changes to landscape character happen irrespective of visibility and it is without question that the scheme will change the character of this land* ' . That change will be from an entirely rural landscape to an industrialised one. This landscape is visible at great distances and from high ground to both north and south. The fundamental change to the character of this sensitive landscape cannot be 'mitigated' by planting some more trees and hedges. The harm is not offset by the claimed benefits of the panels, which are hugely less efficient in terms of electricity production than offshore wind turbines.

Use of vehicles on public footpaths

14. We are very concerned that non-agricultural vehicles will be using the public footpaths -Y19/13, and Y 19/14. The legal rights acquired that enable developers to circumvent a basic principle of public footpath use - that only agricultural vehicles should use public footpaths-

should be disclosed and evidenced in full on the planning portal, so that they can be examined and challenged if found to be deficient. At present there is simply a bare assertion by the Applicant that such rights have been acquired, but no evidence has been provided as to what they are.

15. Cumulative Impacts

Charles Potterton has correctly raised concerns about the cumulative impacts arising from a solar farm that is 'intervisible' with the proposed development [20/00315/FUL, approved 2021], but has not also commented on the cumulative impacts that arise from the growing number of solar farms in the area, that are not 'intervisible' with the site. These types of effects are typically experienced from cars passing through a locality.

16. Community benefits

We note with concern the comments from Rachel Jacobson of RPS Group in her email to the case officer 4.1.22 that *'the only thing that isn't and won't be addressed is your question: have community benefits been addressed'*? She goes on to say that a *'goodwill gesture'* has been made to the parish council. This unsatisfactory situation can be compared with, and contrasted to, the substantial annual payments that both Dorset and Cornwall Councils have negotiated on behalf of local communities from solar farm developers. There is no reason why South Somerset DC cannot insist on significant annual community benefits being paid in cases where a solar farm is approved on poor grade land, comparable to those received by local communities elsewhere in the SW from similar schemes. However, in this case our local enquiries indicate that it is most likely to be largely BMV land at Pipplepen Farm.

In conclusion, we re-iterate our objections to this scheme, and also ask that the missing agricultural land classification report be posted on the planning portal without delay.

Yours sincerely,

Fletcher Robinson MSc Planning
Trustee and Planner
CPRE Somerset

Appendix- photo showing the intrinsic beauty of the proposed development site landscape. The photo shows an area of the scheme near the railway track that plainly cannot be effectively screened from higher ground to the north.



