



The countryside charity
Somerset

planning@cpresomerset.org.uk
www.cpresomerset.org.uk

President Mariella Frostrup
Chair Hugh Williams
Planner Fletcher Robinson

4 July, 2025

To: Somerset Council

For: Planning Team West

FAO: Paul Sherman, Case Officer

Dear Planning Team West,

14/25/0018 - Installation of solar farm and energy storage system on land at Willows Farm, Creech St Michael

CPRE Somerset wish to **OBJECT** to this planning application.

Flood risk

It is well known that the entire site is prone to severe flooding. Whilst the focus of this representation will be the impact on the iconic Levels and Moors landscape, it is the trustees' opinion that the development of a huge electricity generating plant is incompatible with a site that is 92% in Flood Zone 3b.

We are concerned by the applicant's promotional leaflet in which they described this proposal as a '*pioneering project*'. We are not aware of any solar plant approved anywhere in the country entirely in Flood Zone 3b and are concerned that, should this proposal be consented, it could have ramifications for the entire Somerset Levels. We trust that the LPA will be robust in the application of clear policy, guidance and regulations, and will reject this proposal.

The Landscape and Visual Impact Appraisal is inadequate

1. The site is located in the Tone river valley landscape, one of the most beautiful and iconic Somerset landscapes, and a valued landscape for NPPF purposes. The tranquil, pastoral character of the superb river valley landscape would be industrialised by the proposed solar farm but the submitted LVIA makes only cursory reference to this distinctive river landscape and does not properly consider its significance as one of the most attractive and valued landscapes within easy reach of Taunton.
2. The proposed panel-covered area of the development site is stated as 34.7 hectares. To put that into perspective, the size of the development proposal is equivalent to the area of approximately 49 Premiership sized football pitches.
3. Panels will form a continuous block of monotone colour over a huge area which would be highly discordant with the patchwork character and textures of existing landscape patterns and the high quality, rural setting. This would create substantial harm to the unique character of the local landscape.
4. Physical damage and degradation of land and soils is likely to occur through erosion and compaction ('The Impact of Solar Photovoltaic (PV) Sites on Agricultural Soils and Land Quality' (2023) ADAS for the Welsh Government.) The piling, configuration of solar panels, infrastructure and cabling will reduce flood storage, concentrate run off and alter drainage patterns. Construction followed by regular maintenance access to solar panels with concentrated raised tracking will cause compaction. This is particularly pertinent to this site which not only floods deeply for long periods but remains waterlogged for months at a time. As is typical for the Somerset Levels, the land is traditionally summer use only. This development proposal has the potential to degrade the soils and affect the carbon sink capabilities of the peat making the development proposal counterproductive.
5. The susceptibility of the existing landscape to accept this type and scale of development does not seem to have been considered in the submitted LVIA. Due to the expansive and open nature of the local area, the Site is easily perceivable with the surrounding landscape both from elevated and low-lying, level ground. As such, the character is particularly fragile and is therefore easily vulnerable to

change and harm. In particular, this industrial type and scale of development which would form a substantial change and would be entirely discordant causing considerable harm. The local area therefore has high susceptibility to this proposed change. High landscape value and high susceptibility suggest a landscape of high sensitivity.

6. This is a special landscape of high value and quality, and it is a valued landscape which should be considered in relation to National Planning Policy Framework (NPPF) Paragraphs 180a and 180b.
7. As we noted on our recent site visit, the landscape is dominated by the River Tone, which meanders along the entire length of the site to the south and east. This is not apparent from the LVIA which, in the Landscape Evaluation refers only to the site forming '*part of the floodplain*' and makes no reference to the River Tone or the valley. Similarly, the Site-Specific Landscape Character Assessment does not mention the river landscape setting, describing the site as '*twenty-one fields on relatively low lying, flat land*'.
8. The 'Aesthetic and Perceptual Factors' paragraphs are similarly deficient in that although they state that a '*sense of place is evident, and the landscape includes some intact key characteristics*', they also make no mention of the river or the valley landscape. They overemphasise the fact that the rural landscape is '*punctuated by farmsteads and small settlements*' when there are only two properties on the same side of the river as the site, one of which is the Grade II* star Coalharbour House, which is historically linked to the site and is now proposed to be surrounded by panels nearly 4 metres high, the closest being only 50 metres away.
9. The 'Physical Influences' paragraphs refer in generalised terms to hedges and agricultural fields, but do not describe the site's contribution to the distinctive river valley landscape or its openness, tranquillity and perceptual qualities that are critical to local character and amenity.

10. The submitted LVIA is further weakened by the absence of photomontages illustrating the true scale and extent of the scheme in views from public vantage points. In view of the large physical extent of the proposal and its close proximity to sensitive receptors, this omission is unhelpful.

Landscape value is substantially understated in the LVIA

11. Paragraphs describing landscape value conclude that this landscape is only 'of medium value' and 'moderate scenic value', and that its components are '*commonplace rather than rare or distinctive*'. We strongly disagree. The River Tone valley meets the criteria for a *valued landscape* in planning terms as set out in the Landscape Institute's Technical Note TGN 02-2, including:
 - **Natural heritage:** The presence of the wide, meandering River Tone and associated wetland features creates a distinctive landscape of high scenic quality.
 - **Cultural heritage:** The site directly abuts and encloses the Grade II* listed Coalharbour House, as well as other listed buildings in the near vicinity.
 - **Recreational:** The area is served by a network of well-used public footpaths and forms part of the green infrastructure connecting Taunton to the surrounding countryside.
 - **Perceptual qualities:** The landscape is notably tranquil and rural, qualities that would be eroded by the installation of large-scale solar infrastructure and associated fencing and security cameras.
 - **Distinctiveness:** The uninterrupted openness and visual connection to the surrounding hills and river corridor create a strong sense of place that is not found in more intensively developed parts of the district.
- The applicant's assertion that the proposed mitigation planting would result in a slight or beneficial effect on landscape character is not credible. The reality is that a development of this scale cannot be integrated without fundamentally altering the perception of this landscape from open tranquil pastoral farmland to industrialised infrastructure.

There are significant adverse impacts on walkers which have not been fully assessed

12. The site is crossed and closely bordered by several public rights of way that afford extensive views across the development area and towards the River Tone and the Quantock Hills beyond. The LVIA has not assessed views from several of these important routes.
13. In particular, no viewpoints have been provided between Viewpoints 1 and 2B along the riverside footpath (the drove) which is a very popular walking and cycle route. The distance along the drove between the two chosen viewpoints is 660 metres from which fields L, M, N,O, P and Q will be visible from various points. Fields N,O and Q will have panels very close to the river at a point which is especially picturesque – where cattle rest and drink at the riverside under the willows - and the failure to provide any viewpoints along that stretch is, in our view, a serious omission and deliberately misleading.
14. The assessment of effect at VP2A and B is assessed at 'Major adverse and significant' at year 1 but reduced to 'slight adverse and not significant' at year 10. We disagree – it will be impossible to screen the 3.5 metre panels in fields N, O and Q which will have panels only a few metres from the riverbank. Any attempt at sufficient screening would be incongruous and entirely out of character with the location. We disagree that any views would be 'glimpsed'.
15. We disagree with the assessment of effect at VP17 from PRoW T17/65 at Knapp Hill, the elevated ground to the east, from which the site would be highly visible in its entirety. It is our view that no mitigation planting could ever have any impact upon the '*appreciably detrimental effect on the character of the scene*'.
16. We disagree with the suggestion that the development would not form 'the key focus' of a view likely to be experienced from this location. When walkers arrive at the top of the hill, they look at the river below meandering through the Levels. It is spectacular.

17. The suggestion that there is likely to be '*equal attraction to the views possible to the west or other parts of the panorama*' fails to factor in the fact that the view to the west would be of 2 solar plants; the existing solar plant at Knapp and the consented 72 acre Ham Farm solar plant. The major adverse cumulative impacts have not been taken into account and the vast majority of the panorama will be industrial rather than rural.
18. We also disagree with the assessment of the views from PROW T10/5 through the site which fails to address the fact that the 3.5 metre panels will surround walkers, completely obscuring the current view of open countryside.
19. The assessment also fails to address the cumulative impact of the proposal with the consented Ham Farm solar plant. Currently, the PROW T10/15 from the canal joins PROW T10/27 which runs through the Ham Farm site to the foot of Thorn Hill and is entirely through open countryside. If this application is approved, the majority of the route will be through industrial complexes with panels, infrastructure, security fencing and cctv.
20. The visual impact on recreational users is therefore substantially understated, and the conclusion that impacts on visual amenity are limited or can be mitigated is not supported by evidence.

The adverse cumulative impacts arising from other solar schemes in the area are unacceptable

21. The cumulative effect of this proposal in combination with the existing Ham Solar Farm and other consented schemes is not adequately addressed. The cumulative visual and character impacts of contiguous or near-contiguous solar installations extending across large areas of the Tone Valley, and surrounding the village of Ham and its heritage assets, will result in the industrialisation of the landscape, contrary to government guidance and local plan policies requiring the conservation of rural character.

The impact on heritage assets is severe and has been understated

22. The heritage impact is especially serious in this case. Unlike Ham Solar Farm, where the site lay opposite heritage assets, this proposal almost entirely surrounds the Grade II listed Coalharbour House*, which is an exceptionally significant heritage asset. In NPPF terms we consider this is 'less than substantial harm at the highest end of the scale' *. This is real and serious harm to the significance and setting of a Grade II* listed house, which is in the highest category of protected heritage assets.(* The term 'substantial harm' is usually reserved for actual physical harm to the fabric of the building).
23. The applicant's assessment gives disproportionate weight to assertions of limited intervisibility and fails to recognise that **setting is defined by experience, character and context**, not solely by line of sight or ownership boundaries. The immediate rural setting of Coalharbour House contributes directly to its historic significance as an isolated riverside farmhouse. Introducing a large-scale industrial installation into this setting fundamentally erodes this significance.
24. Historic England guidance (The Setting of Heritage Assets, 2017) makes clear that the surroundings from which an asset is experienced are a core part of its setting. This is reinforced by case law including *Catesby Estates Ltd v Steer* and the *Forge Field* case, which confirm that decision-makers must afford "considerable importance and weight" to any harm to the setting of a listed building.
25. In this case, the site's configuration results in the heritage asset being effectively enveloped by solar panels, fencing, and associated infrastructure. This is a materially worse impact than at Ham Solar Farm and is incompatible with the requirements of the NPPF (Chapter 16) and the statutory duty under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Mitigation proposals

26. No amount of screening can mitigate the intrinsic change to the character and setting of this landscape that will result from a development of this scale. Although no figure has been provided, we estimate that there could be as many as 85,000 panels at 3.5 m high

panels and only 2 metres apart. They will remain highly visible from multiple public viewpoints, residences and heritage assets. Allowing hedgerows to grow and planting new trees may marginally filter some views but cannot conceal the industrial character of the development or address the cumulative erosion of landscape quality.

Conclusion

27. We have argued that this proposal should be refused for the following reasons:

- The LVIA substantially understates the sensitivity and value of the landscape.
- The cumulative impact of this scheme in combination with existing solar farms will fundamentally industrialise this rural landscape.
- The proposed development would not protect or enhance a valued landscape, because the introduction a significant number of new solar panels would bring further change to the visual characteristics of the area, and this is considered to result in major harm to its character.
- The baseline character assessment fails to describe the River Tone landscape or explain the contribution of the site to heritage significance.
- No photomontages have been provided to illustrate the scale and visual impact of the scheme.
- There is a severe and unacceptable impact on the setting of Coalharbour House, a Grade II* listed building, a building of the highest status in NPPF terms, which is almost entirely surrounded by the development site.
- The adverse impact on the amenity of recreational users and residents has not been properly assessed.
- No credible mitigation exists that can overcome these harms.
- The proposal conflicts with NPPF paragraphs 174, 180, and Chapter 16, as well as relevant local plan policies requiring conservation of landscape character and heritage significance.

The Trustees of CPRE Somerset believe that public acceptability for solar energy will be further eroded if such an insensitively sited proposal were to be approved. We therefore urge the Local Planning Authority to refuse this speculative application.

Yours sincerely,

Hugh Williams, Chair, CPRE Somerset

Fletcher Robinson MSc Planning
Planner
CPRE Somerset