

Planning application Ref: S.14/1336/FUL

Proposal: Continued use of land for agricultural purposes and the installation of up to 18 MW of solar photovoltaic panels and ancillary works.

Location: Manor Farm Upper Wick, Dursley, Gloucestershire, GL11 6DE

Comments of the Cotswolds Conservation Board

1. The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004.

The Board has two statutory purposes¹:

- a) to conserve and enhance the natural beauty of the Area of Outstanding Natural Beauty (AONB); and
- b) To increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.

2. The Board takes issue with applicant's Landscape and Visual Impact Assessment (LVIA) with respect to two points.

a) Recreational Routes

The applicant suggests that users of such routes have High-Medium sensitivity to landscape change. However, the LVIA guidelines suggest that the visual receptors most susceptible to change include people, who are engaged in outdoor recreation, including users of rights of way, whose attention or interest is likely to be focused on the landscape or on particular views.

Thus the Board would suggest that users of recreational routes, and in particular the Cotswold Way would have a High sensitivity to landscape change. The five subsets of sensitivity used by the applicant are not set out in the LVIA guidance.

The applicant assessment suggests that the impact of the proposal on users of the Cotswold Way is adverse. The Board would suggest that because of the high sensitivity of the users of the footpath, this adverse impact is of major significance according to the applicant's matrix in Diagram 2 in the LVIA.

Whilst the applicant suggests that the proposed solar farm would only be visible from a small length of the Cotswold Way it should be noted that the Inspector, in dismissing the appeal for four wind turbines in Berkley Vale (Appeal Ref: APP/C1625/11/2155923) stated;

'Consequently, I attach little weight to the appellant's argument that since the proposal would only affect a very small percentage of the Trail from which the turbines would be visible it would have little impact on the AONB as a whole. This mathematical approach takes no account of the relative values of the

¹ Section 87, Countryside and Rights of Way Act 2000.

various views afforded by the Trail, of which that from Stinchcombe Hill is undoubtedly one of the most outstanding.'

b) Accessible and Recreational Landscapes

The Board takes issue with the applicant's assessment that users of Stinchcombe Hill have only a High to Medium sensitivity to landscape change. As noted by the Inspector, the view from Stinchcombe Hill is outstanding. This is a viewpoint. The Board suggests that users of Stinchcombe Hill, and to the Drakestone viewpoint in particular (as identified on the OS Explorer map) would have the highest sensitivity to landscape change.

The applicant's assessment suggests that the impact of the proposal on users of Stinchcombe Hill is adverse. The Board would suggest that because of the high sensitivity of the users of the hill including Drakestone Point, this adverse impact is of major significance according to the applicant's matrix in Diagram 2 in the LVIA.

- 3 With respect to impact on landscape character the Board would refer to the Inspectors decision regarding a 38.43 hectare solar park in Suffolk (appeal reference **APP/D3505/A/13/2204846**) which states

'The development would result in the loss of arable land for 25 years [30 years in the case under consideration], albeit this would be reversible. Nonetheless, for the lifetime of the development the regimented rows of hard surfaced solar panels would represent intrusive, utilitarian elements on an industrial scale in the open countryside. Together with its associated new buildings and structures, the proposal would have a considerable urbanising impact in this rural location, and would detract from the distinctive topography of the site and its surroundings.'

4. The Board would therefore suggest that this proposal clearly is not in accordance with Stroud Local Plan policy NE8 which includes:

'Development within or affecting the setting of the AONB will only be permitted if all the following criteria are met:

1. The nature, siting and scale are sympathetic to the landscape;
2. The design and materials complement the character of the area'

5. National Policy considerations

These are clearly set out by the Inspector in the Suffolk appeal case referred to above:

22. Turning to Government policy, the National Planning Policy Framework (the Framework) at paragraph 17 recognises within its core planning principles the intrinsic character and beauty of the countryside, and paragraph 109 seeks to protect and enhance valued landscapes.

23. In the House of Commons oral statement of 29 January 2014 the Planning

Minister, Nick Boles, stated the *“The policies in the national planning policy framework are clear that there is no excuse for putting solar farms in the wrong places. The framework is clear that applications for renewable energy development, such as solar farms, should be approved only if the impact including the impact on the landscape – the visual and the cumulative impact – is or can be made acceptable. That is a very high test.”*

24. Also of relevance is the recent Planning Policy Guidance (PPG), paragraph ID 5- 007 of which indicates that local topography is an important factor in assessing whether large scale solar farms could have a damaging effect on the landscape, and which recognises that impact can be as great in predominately flat landscapes as in hilly or mountainous areas. At paragraph ID 5-013 the PPG goes on to say that *“The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes.”* There is no dispute that this solar array, with an installed generating capacity of 10 Mega Watts (MW) is large scale¹. [The proposed development at Wick is for a farm scheme comprising the erection of solar photo voltaic panels in rows approximately 4-5 metres apart across the Site to provide a maximum total output of 14MW.]

25. Additionally, the PPG at paragraph ID 5-010 says that *“Renewable energy developments should be acceptable for their proposed location”*, and indicates at paragraph ID 5-008 that distance away from a development is just one consideration, stating that *“Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses.”*

26. Furthermore, the UK Solar PV Strategy Part 1 of October 2013 sets out four guiding principles for solar PV, the third of which states, amongst other things, that solar PV should be appropriately sited with proper weight being given to environmental considerations such as landscape and visual impact. Following publication of this strategy, the Minister for Energy and Climate Change, Greg Barker, produced a letter dated 1 November 2013 indicating that *“...inappropriately sited solar PV is something that I take extremely seriously and am determined to crack down on.”*

11. The Board is of the view that this proposal has a major adverse significant effect on landscape character in the setting of the Cotswolds AONB and a major adverse effect on visual amenity for users of the Cotswold Way National Trail and visitors to the Drakestone Point viewpoint in the Cotswolds AONB and is therefore contrary to Policy EF1 of the Local Plan and paragraphs 17 and 109 of the National Planning Policy Framework..

Malcolm Watt
Planning Officer
Cotswolds Conservation Board 1st July 2014