

**Planning application Ref:** W/14/01029/PN

**Proposal:** Proposed ground mounted solar farm, associated works and ancillary infrastructure

**Location:** Land off, Longdon Hill, Wickhamford

### **Comments of the Cotswolds Conservation Board**

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

The Board has two statutory purposes<sup>1</sup>:

- 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.

The Council, as a public authority, is required by Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of designation of the AONB in exercising its functions with respect to the area.

2. 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 needs to be considered in the light of Wychavon Local Plan Policy

#### **RES2 RENEWABLE ENERGY FACILITIES**

Proposals for renewable energy schemes will be permitted where the applicant can demonstrate that the proposal would contribute nationally or locally to energy needs and where it would not have an adverse impact on the local environment.

Proposals will be required to demonstrate, through careful location, siting, layout and design, that any adverse impacts have been assessed and can be addressed through an approved programme of mitigation measures.

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<sup>1</sup> Section 87, Countryside and Rights of Way Act 2000.

## 5. National Policy considerations

The Overarching National Policy Statement for Energy (EN-1) includes

***“Developments outside nationally designated areas which might affect them***

*5.9.12 The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.”*

The Planning practice guidance for renewable and low carbon energy<sup>2</sup> states:

15. *“In shaping local criteria for inclusion in Local Plans and considering planning applications in the meantime, it is important to be clear that:*

- *proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration”*

These issues regarding the acceptability or otherwise in rural areas in general 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 scale<sup>1</sup>. [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.*”

7. The site is visible from Bredon Hill within the Cotswolds Area of Outstanding Natural Beauty. The applicant’s viewpoint 13 is somewhat disingenuous in that at the point chosen for the photograph the site is obscured by rising ground associated with the rampart of the Iron Age fort. The site would be visible from the public right of way along the northern crest of the hill. It should be noted that this viewpoint is indicated on OS maps. The Survey has confirmed that the criterion for such identification is where Ordnance Survey maps show well known viewpoints when they are signposted or they have viewpoint indicators. The sensitivity of people to landscape change viewing the landscape at this point is very high, not “negligible” as suggested by the applicant.
8. A special quality of the Cotswolds AONB identified in the Cotswolds AONB Management Plan 2013-18 is “the Cotswold Escarpment, including views to and from it.” Bredon Hill is considered to be an outlier of the escarpment, with similar landscape character.
9. However, the Board notes that the site is 9.3km from this viewpoint and therefore is of the view it will not have a significant adverse effect on views from Bredon Hill.
10. Similarly the Board notes that the site is 6.8km from the Fish Hill viewpoint (Viewpoint 14) and therefore is of the view it will not have a significant adverse effect on views from Fish Hill.
11. It appears that no Glint and Glare assessment has been submitted by the applicant. The Board notes therefore that there has been no specific consideration given to the possible effects of glint and glare from the proposed development on people at the Bredon Hill and Fish Hill viewpoints, which are approximately 250m higher than the application site.