



The countryside charity
Bedfordshire

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Registered Charity 1023435

Working locally and nationally to protect and enhance a beautiful, thriving countryside for everyone to value and enjoy.

For the attention of Peter Vosper, Principal Planning Officer

Ref: CBC Planning Application - CB/23/03583/OUT Application on sites that cross local planning authority Boundaries: Hybrid Planning Application: FULL Application for a Solar Farm and Outline Application Electric and Hydrogen Vehicle Charging Service Station and Battery Storage, all matters reserved other than access.

CPRE Bedfordshire wish to make a number of **objections** in relation to this Planning Application.

It should be stated that, in principle, CPRE is in favour of using renewable energy sources; however, Green Belt land and agricultural land should not be used for this purpose in particular when they are located in an AONB. Within the context of the County, there are more appropriate solutions to be considered, including using house/warehousing rooftops or lower quality land beyond the Green Belt.

1. Significant Impact on Landscape

This application proposes siting the Solar Farm within the Green Belt and therefore any development must be limited and sympathetic, ensuring that the landscape is maintained as open countryside for those who wish to view or use it, and not given over to urban or industrial sprawl.

The proposed Solar Farm is an extension to an existing large solar array east of Millfield Lane developed by the current applicant. CPRE contends that the combined visual impact of the new and existing solar arrays would have a major detrimental visual impact on the Ver valley, which is part of the Chilterns AONB, where these sloping fields are located. The solar arrays will be very visible to any receptors travelling along the valley floor or PROWs in the area.

The NPPF provides guidance on landscape impact at paragraph 170:

“170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognizing the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*

This policy has been supported in appeal case APP/H1515/W/15/3134301, which concluded that *“the Secretary of State agrees with the Inspector that the solar farm would harm to the Green Belt by reason of inappropriateness, loss of openness and encroachment into the countryside.”*

The LVIA submitted, with the application, claims that the visual impact will only be mitigated after at least 15 years of growth of new hedges and trees planted as part of the mitigation measures but that is unproven and still leaves 15 years of high visual impact which is evident when viewing the photos in the individual LVIA documents. This is due to the undulating nature of the surrounding countryside with many high vantage points overlooking the site.

The installation of 2m high fencing, regular 3m high CCTV cameras and ancillary equipment would have a significant impact on the use of a number of local and national public rights of way and is therefore inappropriate in this location. This is reflected in the comments from the Chiltern Society.

The **UK Solar PV Strategy** contains a Roadmap for implementation of PV Solar Farms in the UK. This Roadmap sets out four guiding principles, which form the basis of Government’s strategy for solar PV. The third of these principles is:

“Support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity, and provide opportunities for local communities to influence decisions that affect them.”

This site is crossed by a number of public rights of way, used on a regular basis by local residents from nearby villages. Most of the walks around the site will be enclosed by high hedges and fencing, supported by CCTV cameras and the effect on this area will be unacceptable.

Our major concern is that applications are being handled piecemeal, with no County-wide strategy for assessing the most appropriate locations for renewable energy facilities and in this way protecting Green Belt. With the current level of applications being raised around the Sundon sub-station, it is clear that CBC needs to have an active policy towards this area, rather than passively assessing each application in turn – CBC’s own “Renewable Energy Policy Review” in 2017 advises that *“Applicants will need to be directed to the best places”*; whilst we accept the principle that each application must be assessed on its own merits, it is possible for CBC to provide up-front guidance on the most suitable areas and, during screening discussions, advise that non-preferred sites are more likely to be refused – in a similar way to preferred development areas being cited and supported as Site Allocations in the Local Plan.

2. Proof of Cost-effectiveness

The **UK Solar PV Strategy** contains a Roadmap for implementation of PV Solar Farms in the UK;

this Roadmap sets out four guiding principles, which form the basis of Government's strategy for solar PV. The first of these principles is:

*"Support for solar PV should **allow cost-effective projects to proceed** and to make a cost-effective contribution to UK carbon emission objectives in the context of overall energy goals – ensuring that solar PV has a role alongside other energy generation technologies in delivering carbon reductions, energy security and affordability for consumers."*

To follow Government guidance, therefore, **CBC must be assured that this project is a 'cost-effective project'** and in order to do this they will need to be provided with a financial projection for the project. This may have been delivered by the applicant - we can understand that this may be commercially sensitive and therefore not made public. This projection should prove profitability after all considerations have been taken into account:

- Installation of the Solar Farm
- Connection to the grid, including any required connection and equipment costs
- S106 or related agreements
- Decommissioning of the site
- Returning the site and any landscape features to a state agreed with CBC

There have been a number of applications granted for renewable energy-related projects in the area which have not been implemented; our understanding is that these are not implemented due to lack of economic viability once all costs had been considered. We therefore request that CBC convince itself of the economic viability of this further application **before** considering any approval or conditions.

With this in mind, there are obviously concerns that decommissioning may not ultimately be cost-effective; we therefore request that, should these plans be approved, a condition would be included that funds to cover decommissioning and reinstatement of landscape be set aside either in trust or escrow **during** the operation of the site.

3. Ecological Impact

The Ecological Appraisal 5.29 lists Skylarks as one of the observed ground nesting birds. It has been demonstrated that Skylarks will not nest under Solar Panels and this was mentioned in a refusal for an Essex Planning Application Uttlesford Application: UTT/22/1474/PINS:

"Although Skylark may forage between solar panels and due to potential nest-site loyalty post-development, nest between them, there is minimal evidence to suggest that Skylark will regularly nest between solar panels. In addition research has concluded that ground-nesting birds often require an unbroken line of sight and therefore Skylark may actively avoid nesting at solar farms in most circumstances¹. The RSPB research does provide evidence that Skylark use the solar farms for foraging 1 Montag H, Parker G & Clarkson T. (2016). The effects of solar farms on local biodiversity. A comparative study. Clarkson and Woods & Wychwood Biodiversity. purposes but does not provide evidence that nesting territories will not be displaced. Therefore, as the proposed solar farm will contain panels which are closely spaced, it is presumed that the development will result in a permanent loss of nesting habitat for this Priority species, where solar panels are proposed on suitable nesting habitat."

The Skylark is on the red list of endangered species. CBC needs to carefully consider the ecological impact of this development especially given the close proximity to a number of Sites of Special Scientific Interest.

Finally, please note that in our submission in respect of the proposed development, while we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional

errors or omissions and you should satisfy yourselves on any facts before reaching your decision.

Martin Rickson

For & on behalf of CPRE Bedfordshire