

**SUBMISSION FOR DEADLINE 7
LONGFIELD SOLAR FARM WRITTEN REPRESENTATION FOR 11 JANUARY 2023
FROM PROFESSOR MIKE ALDER UR 20031522**

This WR updates previous submissions. Part 1 is additional information relating to the 'No to Longfield' submission UR 20031600 concerning landscape issues. Part 2 relates to a number of submissions for deadline 5, some of which relate to my supplementary paper submitted for the 3rd November deadline. The information in Part 2 updates land use issues.

PART 1 - LANDSCAPE

NPPF (July 2021 revision)

One of the key paragraphs on protecting landscape is para 174.

CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT

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; B) RECOGNISING 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.

FOOTNOTE 58: WHERE SIGNIFICANT DEVELOPMENT OF AGRICULTURAL LAND IS DEMONSTRATED TO BE NECESSARY, AREAS OF POORER QUALITY LAND SHOULD BE PREFERRED TO THOSE OF A HIGHER QUALITY.

In March 2022 I received a letter from the Department of Levelling Up. The key paragraph is quoted below. Whilst the advice refers to LPAs, it is equally applicable to NSIPs.

"Local authorities are best placed to assess the visual and other impacts of any building or structure proposed; it is right that they decide where necessary development should go, and where restraint is essential, having regard to national as well as local planning policy.

For instance, a number of proposals for solar farms in the countryside have been rejected as causing visual harm, harm to amenity or harm to openness. On the one hand, the Framework expects the planning system to support transition to a low carbon future to renewable and low carbon energy generation. Paragraph 151 adds that development planning should consider identifying suitable areas of renewable and low carbon energy sources and infrastructure. At the same time, local authorities should protect all that we value in landscapes and natural capital, as indicated above."

The decision of the PI to reject an appeal at the Alfreton Solar Farm (6/12/22) has been quoted before, but is worth repeating. It is an example of a site being refused planning on landscape grounds.

"The need for renewable or low carbon energy does not automatically override environmental protections. I have taken into account all other matters raised including the proximity of a suitable grid connection, but in the overall balance, the harm caused to landscape character and visual amenity is decisive. The adverse impacts cannot be addressed satisfactorily on a site of this size and character, and the suggested planting mitigation measures would be seriously out of keeping and would largely worsen, rather than mitigate for the landscape and visual impact. Objectors point out that the panels could simply be replaced after 40 years but it is difficult to predict whether national energy strategy will

still require large solar installations in 2062. I consider that 40 years is a very significant period in peoples' lives during which the development would seriously detract from landscape character and visual amenity."

The House of Lords has recently published its report on Land Use in England. The report notes an inconsistency of planning decisions at national level and it is hoped that in the Longfield case consideration will be given to the Alfreton appeal. In the same report referring to the National Land Use Framework due in early 2023 under the heading 'Making the most of England's Land', paragraph 120 states *"Access to green and open spaces is important for health and well-being. A clear prioritisation within the proposed land use framework is called for and it is particularly important to prioritise access near locations where people live."* This is repeated in para 17 on p.67. This is of particular relevance in the case of the Longfield proposals which are near the highly populated Chelmsford City which is set for considerable expansion with the garden village proposals. Longfield Solar Farm will have a significant impact on the landscape and a visual impact on what is a beautiful part of the Essex countryside. This is identified in the consultation booklet p.21 *"We have identified potential impacts on views into the site from a number of points during the construction, operational and decommissioning phases."*

Specified points to note regarding landscape are:

- Para 6.5.4 acknowledges the fact that the scale and speed required to meet the current and future need identified is likely to have some negative effects on the landscape and visual amenity which may not be able to be mitigated.
- Landscape Visual Amenity – para 10.8.18 notes medium sensitivity and medium magnitude effect (in construction) with moderate adverse to significant effect.
- Para 10.8.39 – the scheme would result in the loss of some key characteristics, namely the agricultural character and reduction in the sense of openness given the change of land use.
- Para 10.8.59 notes – People walking the Essex Way would experience moderate adverse effects. These effects are considered to be significant.
- Para 10.9.2 – it would not be possible to mitigate every adverse effect due to requirements of the solar generation. Table 10.7 indicates the residual effects after mitigation – a number of which are described as major adverse and significant.

Mitigation effects

- Para 10.8.62 states that by year 15 the proposed planting would have established and would be in leaf and reduce the perception of the new infrastructure.
- Para 10.8.5 refers to advance mitigation planting, stating this would have significant effects by year 4.

Overall Landscape Conclusions

Landscape and visual impact will be very significant. Mitigation will have little impact since trees and hedgerows that will be planted to try and limit the adverse impacts will have little effect through the early part of the scheme.

NPPF guidelines, planning appeals, the House of Lords Land Use Inquiry and government advice all back up the fact that a DCO should not be granted on the basis of a significant landscape impact.

PART 2 – FURTHER LAND USE ISSUES/EVIDENCE

1. National Land Use Framework. This paper is due to be published in early 2023. It is expected to provide greater protection for valuable farmland.
2. House of Lords Inquiry on Land Use in England. The key paragraph is 132 repeated on p.68, para 18:

“132. Although there are provisions within the NPPF to dissuade the development of solar farms on Best and Most Versatile land, from the evidence received we are concerned that too many exceptions are being made. we believe that a consistent policy toward encouraging the installation of solar panels on industrial, commercial and domestic buildings is needed and would negate the need for large-scale ground mounted solar farms. Alongside that, we would like to see stricter regulations put in place to prevent the development of solar farms on BMV land. We also believe onshore wind turbines still have a crucial role to play in achieving national energy self-sufficiency”.

3. NPPF. At the report stage of the Levelling-up Bill, which is returning to the House of Commons, Ministers have agreed to ‘beef up’ the NPPF with stronger protection for agricultural land in the planning system. This is further confirmed in a letter from Felicity Buchan MP, Minister for Housing & Homelessness, to Greg Smith MP. She refers to valuable agricultural land stating the department will *“be making it harder for developers to build on it and ensuring the importance of food security is recognised.”*
4. Statement by Secretary of State for the Environment, Teresa Coffey: *“3b land could be used for solar farms. I’m not suggesting by default I want to put solar over every bit of 3b. I think we do need to get that careful balance across and make the best use of land. I’m more inclined about brown field sites”.* In relation to Longfield and careful balances I would suggest any 3b land should not be put under solar.

5. Overall Land Use Conclusions

Previous submissions have indicated the Longfield site was shown as grade 2 land, hence all BMV. An analysis of ALC carried out by Land Research Associates for the developer showed over 50% of the site to be BMV and the rest very marginal and certainly valuable farmland.

It is clear that national policy is moving towards stricter regulations to protect valuable farmland and the importance of food security is increasingly recognised. There is general agreement that solar panels on industrial, commercial and domestic buildings, as well as brownfield sites, would negate the need for large scale ground mounted solar farms.

A solar farm on the Longfield site would clearly be inappropriate land use and planning approval should not be granted.