

Creech St Michael Parish Council

A Parish to be *Proud of*

Date: 12th January 2023

REF: 14/22/0051

Planning Officer: Mr G Clifford

Dear Mr G Clifford,

Installation and operation of solar farm and energy storage system with associated works, equipment and infrastructure on land at Ham Farm, Ham, Creech St Michael.

At a meeting of Creech St Michael Parish Council held on the 9th January 2023, in the presence of eighteen members of the community, the planning application reference 14/22/0051 was considered and the following is the response of Creech St Michael Parish Council.

Summary of our Response to the Application

The Parish Council has no objection or comments

The Parish Council has no objection, subject to the comments

The Parish Council objects in principle

X

The Parish Council objects as the application is not acceptable in its current format

Comments

Impact on Landscape

The proposal is contrary to Taunton Deane Core Strategy 2011 – 2028 Development Management Polices, specifically that any development should not unacceptably harm the appearance and character of an area, reflecting objectives of the National Planning Policy Framework (NPPF).

Core Policy 1 Climate Change of the Taunton Deane Core Strategy 2011 – 2028 states that “proposals for the development of renewable and low carbon sources of energy, including large-scale

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freestanding installations will be favourably considered provided that: Their scale, form, design, materials and cumulative impacts can be satisfactorily assimilated into the landscape or built environment and would not harm the character of these areas and has no overriding adverse impact on the amenity of the area in respect of noise, dust, odour and traffic generation;”

The Parish Council believes that the proposed development will have a significant and lasting impact on the character and landscape of the area. This landscape is typical of Taunton Deane Low Vale and exudes a strong sense of being a vale with flat to gently undulating terrain centred around the River Tone. The area also benefits from a strong hedgerow network (with striking trees) defining a field system that is both of ancient and recent enclosure.

The Parish Council believes that;

- this landscape should be protected, conserved or enhanced,
- that the size, location and density of the 72 acre site will introduce a significant and overwhelming industrial form which is out of character for the landscape and will have a major adverse effect on both the landscape and the hamlet of Ham,
- any attempt to screen the solar farm, the whole of which will be seen from many locations, will fail to minimise the impact of the site on the character for the area.

The Parish Council believes that the proposed development will result in substantial harm to the setting of three designated heritage assets which have individual and group value:

- Grade II* Coalharbour
- Grade II Old Ham Wharf Farm
- Grade II Ham Mills

Government guidance on renewable and low carbon energy, published in June 2015 clearly identifies the need for “great care [to] be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large-scale solar farms on such assets. Depending on their scale, design and prominence, a large-scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset”

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Landscape and Visual Impact Assessment (LVIA)

The Parish Council strongly disagrees with the LVIA which states:

“The addition of the proposed solar farm in a few middle-distance publicly afforded linear route views in the landscape would not adversely alter the appreciation of the view. There would be no significant impacts more broadly on the landscape character or views in the local area. From a landscape and visual perspective, any notable effects on landscape character as a result of the proposed development would be confined to surrounding local areas with visual effects reduced by the proposed mitigation planting in both local and more distant views. Overall, the total extent of the landscape and visual effects would be very localised and limited in nature.”

The LVIA is missing the following elements or is incorrect in the following ways:

- A suitable range of images highlighting the impact on the views across the landscape.
- Photomontages of the landscape at the outset and 10 years (as promised at the pre-application stage and in the LVIA).
- Viewpoints from the Westmoor Drove public footpath T17/47 and T10/3, T17/35 and T17/45
- The Zones of Theoretical Visibility provided at pre-application stage were based on panels of a maximum height of up to 3 meters whereas the application is based on a height of 3.1 metres.
- The pre-application also stated that a landscaping scheme “will be developed” but no evidence of this has been provided.

The Parish Council agrees with the LVIA conclusion at page 5, that the “resulting long term effect on the views of the landscape character of the area is assessed as being significant and adverse”.

Best and Most Versatile (BMV) Land

More than two-thirds of the proposed site is categorised as BMV land. Government policy has consistently aimed to protect valuable farmland. Most recently:

Energy Security Strategy (7/4/22)

“We will continue supporting the effective use of land by encouraging large scale projects to locate on previously developed or lower value land”.

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Food Strategy (13/6/22)

Para 1.2.2 "it is possible to target land use change at the least productive land"

Historically the policy to protect valuable farmland can be traced back a long way, e.g. Government policy for England is set out in the National Planning Policy Framework (NPPF) published in March 2012 (paragraph 112). Decisions rest with the relevant planning authorities who should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary local planning authorities should seek to use areas of poorer quality and in preference to that of higher quality. The Government has also re-affirmed the importance of protecting our soils and the services they provide in the Natural Environment White Paper *The Natural Choice: securing the value of nature* (June 2011), including the protection of best and most versatile agricultural land (paragraph 2.35).

A further example is provided in the letter below written just over a eighteen month's ago:
Eddie Hughes MP, Ministry of Housing, Communities and Local Government (in a letter dated 2nd June 2021 to Kemi Badenoch, MP):

'There are strong protections in place within national planning policy which guards against inappropriately sited solar farms...expects local authorities...to take account of the benefits of the best and most versatile farmland, to enhance the biodiversity and recognise the character and beauty of the countryside....Where a proposal involves Greenfield land, local councils are expected to consider whether the proposed use of any agricultural land has been shown to be necessary. Where high-quality agricultural land is involved, this would need to be justified by the most compelling evidence. We have been clear that the need for renewable energy does not automatically override environmental protections and the planning concerns of local communities, and that the views of local communities should be listened to....Where relevant planning considerations are raised by local residents these must be taken into account by the local council'.

The Parish Council therefore believes that there is a strong presumption against solar farms on BMV land.

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Impact on Public Right of Way (PROW)

Somerset County Council's Rights of Way Improvement Plan recognises the importance of PROW and the statutory duty to maintain and improve them; they are a free resource necessary for the community's physical and mental health. This proposed development would have a significant and detrimental impact on PROW. Specifically,

- T10/27, the bridleway running through the site currently enjoys sweeping views across beautiful rolling countryside from as far as the Levels and Moors to Thorn Hill. Those views will be completely blocked by the 1000's of solar panels which, on the zone 2 floodplain will be 4-5 metres above the path on both sides. Ann Finn, the Chair of Taunton Deane Bridleways Association commented on the 23 December 2022 that the "installation would impact greatly upon public bridleway T10/27 which goes through the site and Public Bridleway 27/8, Restricted Byways T/27/8/1 and T17/64 which run adjacent or about the site."

Additional scale plans and cross-sections are required at a suggested scales of 1:500 or 1:1250, to show the details of how the public bridleways T 10/27 and T 27/8 will be accommodated at the site particularly in relation to proposed infrastructure such as boundary treatments and proposed access tracks.

Noise Impacts

The Parish Council believes that the Noise Report is flawed, as there is no background noise survey provided and the report is based on only four batteries with sixteen HVAC units on top. However, the application is proposing 8 batteries with 32 HVAC.

Yours sincerely



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Clerk and RFO

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