



The countryside charity
Bedfordshire

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Mr Greg Logan
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7 November 2021

Dear Greg Logan

**Re Planning Application: 21/02526/MAF Snakes Meadow West End Stagsden
Bedfordshire**

Construction, installation, operation and subsequent decommissioning of a renewable energy scheme comprising ground mounted photovoltaic solar arrays together with substation compound; inverters, transformer station, cable trench, point of connection infrastructure, internal access track, landscaping, biodiversity measures, permissive footpath, security fencing, security measures, access improvements and ancillary infrastructure.

At the end of decommissioning, the permissive footpath would be removed.

CPRE Bedfordshire is a strong advocate for the generation of electricity through a variety of both small and large scale Solar Pv systems.

However, we wish to ensure that wherever possible Solar Pv generating systems are located in the most appropriate locations, ensuring that environmental damage is kept to a minimum.

For this reason we will support large scale Solar Pv Farms when they are situated on brownfield (previously used) land or on the poorest quality agricultural land with Agricultural Land Classification (ALC) of 3b, 4 and 5, provided that they are not in Areas of Outstanding Natural Beauty or in National Parks and do not have an unduly adverse impact on the surrounding landscape.

We also support and encourage large scale solar installations on the roofs of industrial and commercial buildings e.g. offices, factories, retail complexes and warehouses.

We have supported large scale solar farms in various parts of Bedfordshire which comply with this policy.

In this case, CPRE Bedfordshire is writing to object to the above planning application for the following reasons:

1. The construction of the proposed Solar Farm will take place on the “Best and Most Versatile” (BMV) agricultural land in contravention of current Government guidance with regard to the siting of Large Scale Solar Farms and also, in contravention of Para 9.32 and Policy 56 of Bedford Borough Council’s recently adopted Local Plan 2030.

It is also contrary to para 7 of the NPPF which states that:

“The purpose of the planning system is to contribute to the achievement of sustainable development.”

Both Government and BBC planning guidance require that proposals for large scale solar farms should make effective use of previously developed land and, where a proposal requires the use of agricultural land, that poorer quality land should be used in preference to land of a higher quality i.e. “BMV” agricultural land, classified as Grades 1, 2 and 3a.

We would highlight a ministerial statement made on the 25th March 2015 by the DHC&LG and the Rt Hon Eric Pickles MP regarding solar farms, who said:

“.....We are encouraged by the impact the guidance is having but do appreciate the continuing concerns, not least those raised in this House, about the unjustified use of high quality agricultural land.

In light of these concerns we want it to be clear that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence.” This remains government guidance.

1a. Agricultural Land Classification (ALC)

At a time of Climate Change, it is vitally important that the BMV agricultural land is protected from development, since every square metre – every hectare, will be required to grow food for our population as Climate Change bites and weather systems become even more unpredictable, as we have seen in recent years.

The majority of the land put forward by the applicant for the development of the proposed Solar Farm lies within Bedford Borough and, according to the map (Figure13) on page 100 of the BBC Local Plan 2030 (copy attached) which provides:

“Broad locations with potential for large scale solar energy development and constraints” (The locations are coloured yellow on the map).

The part of the proposed site which is located in Bedford Borough is classified as Grade 2, the “best and most versatile” (BMV) agricultural land and some of the most important agricultural land in the country.

For this reason the area has not been identified by BBC as a location with the potential for large scale solar farms.

We have noted that the BBC map (Figure 13) is indicative only and so we have checked the following:

(i) Natural England Agricultural Land Classification map for the Eastern Region (copy attached)

This also indicates that the entire area of the site which lies within Bedford Borough has an ALC of Grade 2

(ii) The Natural England and DEFRA Interactive Map showing the ALC for the whole of England.

It can be found here:

<https://naturalengland-defra.opendata.arcgis.com/datasets/provisional-agricultural-land-classification-alc-england/explore?location=52.812890%2C-2.141583%2C6.98>

This holds the latest data which was updated by DEFRA and Natural England in April 2019.

Similarly, this also shows that the part of the proposed site that is within Bedford Borough has an ALC of Grade 2.

As the site moves into Milton Keynes and Central Bedfordshire local authority areas, the “official” ALC reduces to undifferentiated Grade 3.

1b. The applicant has provided their own Agricultural Land Classification for the entire site dated 6 September 2021 – Issue 2.

Most unusually, this completely contradicts the Natural England and DEFRA maps, finding that all the land is either Grade 3a or Grade 3b with the majority being identified as Grade 3b as follows:

Non-Agricultural: 1 Ha

Grade 3a: 29 Ha - “best and most versatile land”

Grade 3b: 47 Ha

The borehole map included in the applicant’s ALC Report, indicates that much of the land in Bedford Borough identified as Grade 2 by Natural England/DEFRA is in their opinion Grade 3b, a very substantial downgrade indeed which is very difficult to understand.

Unusually, there is no comment in the applicants ALC Report explaining the reason why they consider that the land should be down-graded to such an extent.

In our experience, it is quite common to undertake an ALC analysis of undifferentiated Grade 3 land in order to differentiate between Grades 3a and 3b but, we have rarely seen a re-analysis of land classified by NE or DEFRA as Grade 2, and we have never seen it reduced from Grade 2 to Grade 3b.

We note that the name of the person(s) or company which has actually undertaken the ALC survey and analysis have not been mentioned in the report and their qualifications are not noted.

This is most unsatisfactory and in this instance, in view of the very considerable downgrading of Grade 2 land, we urge BBC to require the applicant to use an independent organisation to undertake a review of the ALC and that that organisation should be selected by BBC themselves.

The University of Cranfield has considerable expertise in this area of work and could be asked to provide an independent ALC of the proposed site, to be paid for by the applicant.

2. Alternative locations are available for large scale solar farms

The applicant states that this proposed location is the only one available in Bedfordshire which will allow access to the National Grid and therefore, despite the fact that the proposed Solar Farm will be constructed on the “best and most versatile” agricultural land, it should be approved.

This is completely incorrect.

It is not necessary for the Grid connection to be at the location identified by the applicant, there are many different locations where access to the Grid can be made.

There are also many brownfield locations across the county, for example on land in the Marston Vale which was previously used to quarry clay or as refuse dumps.

There are a considerable number of very large warehouses along the A421 transport corridor, the roofs of which could easily be used as sites for large scale solar farms and for which the Government has provided “Permitted Development Rights” i.e. for which planning permission is not required.

Similar opportunities exist not only in Bedford Borough but also in Central Bedfordshire and in the Borough of Milton Keynes.

Cranfield Airport for example, is currently considering the possible development of a large number of new aircraft hangers at the airfield – the roofs of these buildings should also be used as locations for large scale solar farms.

3. Precedent has been set by Bedford Borough Council in refusing planning permission for a large scale solar farm on the “best and most versatile” agricultural land

Planning Application - 15/00444/MAF Proposed Solar Farm Wood Road/Dungee Road, Harrold in Bedford Borough was refused permission by the Planning Officer in July 2015 for the reason that it would be located on BMV land – in that case, Grade 3a agricultural land.

4. Temporary planning permission for the proposed Solar Farm for a period of 40 years is far too long and unacceptable.

The applicant is seeking temporary planning permission for a period of 40 years after which the applicant or the owners of the installation at that time, will be responsible for the removal of the Solar Farm and the restoration of the site to farming land.

40 years is equivalent to 2 generations and is far too long a time period – much can happen in terms of technological changes and improvements over such a timescale which could make the proposed Solar Farm completely uncompetitive. The solar panels and other equipment on the Solar Farm have a maximum lifespan of between 10 and 20 years on average.

It is also quite common for the ownership of these Solar Farms to be sold on, often to companies registered offshore which are very secretive and difficult to contact.

This would leave the public purse to pick up the cost of removal and disposal of the Solar Panels and other infrastructure and this could be extremely costly in the future.

A lifespan of 25 years should be the maximum period of Temporary Planning Permission and the applicant or owner of the Solar Farm installation should be required to lodge an Insurance Bond with the Local Planning Authority which would cover the costs of returning the site to agricultural land.

Yours sincerely

Gerry Sansom

CPRE Bedfordshire