



The countryside charity
Bedfordshire

CPRE Bedfordshire
43 Bromham Road
Bedford
MK40 2AA

Telephone: 01234 880624
Email: info@cprebeds.org.uk
www.cprebeds.org.uk
Registered Charity 1023435

Rachel Duncan
Planning Services
Bedford Borough Council
4th Floor
Borough Hall
Cauldwell Street
Bedford
MK42 9AP.

8th August 2022

Dear Rachel Duncan,

**Re: Planning Application 22/01581/MAF Land North Of College Farm Green Lane
Clapham Bedfordshire**

Construction and operation of a solar photovoltaic farm including fencing, internal service tracks, inverters, transformer stations, cabling, CCTV, landscaping, substations and ancillary cabins

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

We have supported 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. Agricultural Land Classification (ALC) Best and Most Versatile (BMV) agricultural land

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.

In support of this application the developer states that the proposed solar farm is located on land 'with land quality limited to subgrade 3b by wetness'. However, the Natural England Agricultural Land Classification map for the Eastern Region shows the entire area of the site is classified as Grade 2. In view of the very considerable downgrading of Grade 2 land, we urge the Council to take steps to verify the classification of the land as put forward by the applicant.

In view of the classification which appears to be clearly evident from the Natural England Agricultural Land Classification map, the following comments are submitted on the assumption that the land is in fact Grade 2 and as such, is on high quality agricultural land.

The development of solar farms on Best and Most Versatile (BMV) agricultural land is in conflict with current government guidance as follows;

- NPPF para 7 states: "The purpose of the planning system is to contribute to the achievement of sustainable development"
- NPPF para 174 states: "Planning policies and decisions should contribute to and enhance the natural and local environment by: **"b) recognising..... the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land."**

The application also conflicts with **Policy 57 Renewable energy - general impact** in Bedford Borough Council's recently adopted Local Plan 2030. Policy 57 identifies specific impacts for solar energy schemes which include; '**consideration of the impact on Best and Most Versatile agricultural land.'**

Both government and Borough Council planning policy requires that proposals for 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 also 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.**

Precedent has been set by Bedford Borough Council in refusing planning permission for a solar farm on BMV agricultural land. Planning Application - 15/00444/MAF Proposed Solar Farm Wood Road/Dungee Road, Harrold was refused permission by the Council in

July 2015 for the reason that it would be located on BMV land – in that case, Grade 3a agricultural land.

2. Landscape and visual impact

NPPF para 174 states: “Planning policies and decisions should contribute to and enhance the natural and local environment by: **b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.**”

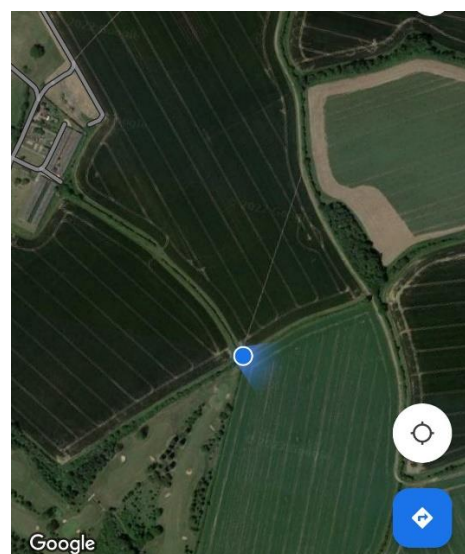
Bedford Borough Council’s Local Plan 2030 refers to national planning policy in para 9.35 stating that ‘Government guidance makes clear that the need for renewable energy does not override environmental protections and the planning concerns of local communities. **Sufficient weight should be given to landscape and visual impact concerns and particular planning considerations that relate to renewable energy technologies.**’

Local Plan 2030 advises that individual planning decisions should take account of a range of relevant planning considerations, as set out in Policy 57. General impacts that need to be considered include **“Context, visual appearance and landscape character.”**

The location for the proposed solar farm put forward in this application is in an area of open countryside near the village of Clapham. Public Rights of Way, adjacent to the perimeter of the field in question, run north to south on the west side of the field and in south easterly direction for a large part of the eastern side of the field. **These footpaths are very popular with local residents who enjoy the rural setting and extensive views across agricultural land that would be hugely damaged by the installation of a solar farm.**

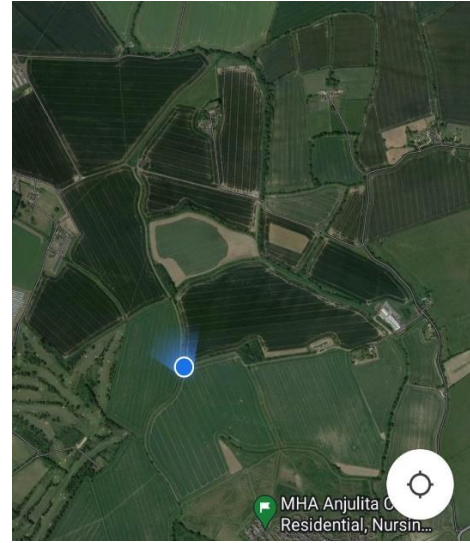
Pictures of the land upon which the installation would be located, illustrate current visual appearance and landscape character;

Figure 1. View from NW side of field looking in a E to SE direction*



*The blue dot on the ariel screenshot shows the spot where the picture was taken

Figure 2. View from E side of field looking in a NW direction*



*The blue dot on the ariel screenshot shows the spot where the picture was taken

As the applicant's Planning Statement notes, there is already an existing Solar PV installation only 500 metres to the west from the application site. The existence of this installation is a further aggravating factor. Permitting this development would have a blighting effect on the local landscape character.

3. Alternative locations are available for large scale solar farms

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.

4. Temporary planning permission for the proposed Solar Farm for a period of 50 years is far too long and unacceptable.

The applicant is seeking temporary planning permission for a period of 50 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. 50 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 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,

Paul Jenkins
Vice Chair CPRE Bedfordshire