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Response to East Park Energy Consultation October 2024

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 schemes 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. Planning Policy

- In para 9.32 Bedford Borough Council's Local Plan 2030 refers to government guidance on large scale solar development as follows; *"proposals should make effective use of previously developed land and, where a proposal requires the use of agricultural land, poorer quality land should be used in preference to land of a higher quality."* This methodology therefore identifies the location of the best and most versatile (BMV) agricultural land, where it is known, as an area which is not suitable.'
- Local Plan Policy 56 Renewable energy broad locations suitable for renewable energy development states that planning permission will be

granted for large-scale (>100kW) wind and solar energy development where proposals are within the broad locations shown on Figures 12 and 13, and where proposals satisfy the requirements of Policy 57 on general impact, together with any other relevant planning considerations.

- Policy 57 states that proposals for development involving the provision of renewable and/or low carbon energy generation, including community energy projects, will be supported, subject to the acceptability of their wider impacts. As part of such proposals, it shall be demonstrated that all of the following potential impacts (including cumulative impacts) have been fully addressed in consultation with affected local communities.
 - General impacts
 - I. Context, visual appearance and landscape character.
 - II. Natural features, the natural environment, geology and biodiversity (including Natura 2000 sites).
 - III. Cultural features, historical and archaeological features, heritage assets and their settings.
 - IV. Local land use, social and economic impacts.
 - V. Surface and ground water.
 - VI. Traffic and access.
- It is clear that this proposed development does not meet the conditions and general criteria set out in these policies to determine whether or not a scheme of this kind is acceptable. The following reasons apply;
 - Negative impact on landscape and rural communities, including construction impacts
 - o Loss of BMV agricultural land and food security
 - There are better alternatives for generating solar energy than constructing massive installations in the countryside as evidenced by CPREs rooftop solar campaign.

2. Impact on landscape and rural communities, including construction impacts

- The maps provided by East Park Energy as part of the Consultation Brochure are far too small in scale making it very difficult for local people to easily identify their own location and therefore the impact the proposed development will have on their locality
- This is a massive scheme covering a vast area of quiet countryside and rural villages. The impact of the scheme would be to completely

transform the area from its historic and current largely agricultural character to an industrial complex across a 6 mile corridor covering 1,900 acres. The proposed development will contain a massive 700,000 panels and will be the size of 1,000 football pitches.

It will cover a larger area than Gatwick Airport!

- The impact on local communities across the area will be immense. Small villages like Little Staughton, Keysoe and Pertenhall will be almost encircled by fields of 1,000's of solar panels, completely transforming the sense of place in this rural area currently Open Countryside.
- Public Footpaths through the proposed farm will become hedge lined "alleyways" through fields of Solar Panels.
- The suggestion by the developer that it could be constructed in a way that protects landscape character through careful siting and screening completely lacks credibility.

3. Loss of BMV agricultural land and food security

- 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.
- 75% of the land identified for the proposed East Park Solar development is classified as Best and Most Versatile (BMV) agricultural land grade 2. It is therefore outside government policy and the policies of Local Plan 2030.

It should be refused on these grounds alone.

4. Opportunities for solar on rooftops offer a better alternative;

- A major CPRE report has found that over half the solar panels needed to hit national net zero targets could be fitted on rooftops and in car parks.
- The research, by the UCL Energy Institute, for CPRE, shows that decarbonising the national energy grid requires far less land than feared. Installing solar panels on existing buildings and car parks would enjoy near-universal public support and help minimise objections to large solar farms in the countryside, the research finds. It also reveals that the potential of brownfield sites to generate renewable energy is dramatically underused.

- The report's publication marks the launch of CPRE's new campaign for rooftop renewables and a petition calling on the government to ensure all suitable new buildings have rooftop solar. We're calling on the government to set a national rooftop solar target of at least 40GW by 2035.
- The government has set a national target of 70GW of solar energy generation by 2035. CPRE's report analysed the solar capacity of rooftops and covered car parks across England, providing an assessment of the total energy that could be generated.
- The key findings are:
 - Installing solar panels on existing rooftops and other land such as car parks could provide at least 40-50GW in England by 2035.
 - In 2050, with further investment, there is potential to generate 117GW of low carbon electricity from roofs and other developed spaces.
 - As well as calling on the government to ensure all suitable new buildings have rooftop solar as standard, we want to see regulations updated so that solar capacity is a requirement of planning permission for major refurbishments and new residential, commercial and industrial buildings.

https://www.cpre.org.uk/wp-content/uploads/2023/05/Rooftop-Revolution-Report.pdf

Paul Jenkins

Vice Chair CPRE Bedfordshire

28th October 2024