



The countryside charity
Herefordshire

61 Bridge Street
Kington
Herefordshire
HR5 3DJ

admin@cpreherefordshire.org.uk
www.cpreherefordshire.org.uk

Patron
His Majesty, The King

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Rebecca Jenman
Planning Officer
Herefordshire Planning Department
c/o planning_enquiries@herefordshire.gov.uk

Dear Ms Jenman

P241510/F Land at Stoke Edith, Hereford. Proposed installation and operation of a renewable energy generation station comprising ground-mounted photovoltaic, inverter/transformer units, control room, substations, onsite grid connection equipment, site access, access gates, internal access tracks, security measures and other ancillary infrastructure.

CPRE is fully supportive of the need to reduce dependency on fossil fuels, and to reduce the damaging levels of carbon emissions. However, we object to large scale, industrial installations in locations whose natural environment and landscape will be harmed by the nature of the activity. We believe this application falls into that category and therefore we object to this Application for reasons detailed below.

1. This is a large industrial development in a rural landscape and is the third solar farm in the area. One very large solar farm (61.5 ha) is under construction at Westhild (3 km from the site) and one 45ha site is already in operation at Dormington/Larport (2.4 km from the site). **The cumulative impact of these three developments will be significant.** The D& A sees this as a positive *'The Site falls within an area which is already characterised by electrical infrastructure, including a solar farm.'* However the NPPF 2023 para 160 states that cumulative landscape and visual impact should be taken into account when assessing renewable energy applications *'.....plans should: a) provide a positive strategy for energy while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts).'*

Such large scale industrial developments are contrary to Weston Beggard NDP Objective 1 *'to maintain the rural integrity, identity and character of the rural landscape'*. With policies WB1 and WB5 covering the subject and stating at para 6.8 *'the plan does not support the provision of large scale commercial renewable energy projects in the Parish due to their impact on the local environment'*.

2. The applicant's soil survey grades the land 3b (moderate quality) agricultural land. The land is currently used for arable. CPRE believes that solar should be placed on rooftops and brownfield land, it should not be sited on land which is growing, and can grow, food. (CPRE *'the Problem with Solar; Shout from the rooftops'*. and *'The Problems with Solar Farms'*). The applicant does not make a case for the need for this facility in this location – there are two large solar farms nearby, the land is productive, there is no gain to the local community. The sequential and exception test looks at other possible locations for such a facility without explaining why it is needed at all. This is not the best use for this land.

The applicant argues in the Planning Statement 8.1.1 that *'... there will be no loss of agricultural uses as the Site can continue to be used for grazing with the panels in place. Furthermore, any perceived loss would be*

temporary and reversible as the Site can be used for agricultural uses following the decommissioning of the development.'

It is not true that there will be 'no loss of agricultural use' as sheep grazing between the panels is a much less productive form of agricultural use than arable and would be on only a small part of the site. The use of the word 'temporary' is questionable, it is also questionable whether the land could be returned to agricultural use after 40 years. It is also not clear which types/quality of grazing grass will flourish long-term, the quality of grass can be important for the range of invertebrate and other life-forms eg birds. The applicant should be asked to provide this information.

3. The landscape, whilst undesignated, is clearly valued by local residents and visitors as shown in residents' comments in response to the proposals. The Yarkhill NDP: Para 10.1 states *'the local landscape character of Yarkhill is one of the Parish's key attributes and is highly valued by local residents'* and Weston Beggard NDP para 7.3 states *'...residents have responded by saying that the ongoing preservation and enhancement of the parish's attractive and valued rural environment is important and will continue to enhance their quality of life'*. It goes on at para 2.14 to particularly note the value of footpaths and views.

The Herefordshire Core Strategy (HCS) recognises the value of such undesignated landscape: *"Landscape is important, not just as scenery but because it links culture with nature, and the past with the present. It has many values and it matters to people-it is people who create and value landscape. All landscapes matter, not only those with national designations"* (LD1 Landscape and townscape).

The proposed development will alter this valued landscape for a significant period of time and the proposed mitigation of the visual impact will not be effective from all viewpoints, particularly elevated land. There will be a long delay before screening will be effective (15 years) from viewpoints adjacent to the site and the screening will never be effective from the long high viewpoints (eg Shucknall Hill) above the valley. From these viewpoints the reflective nature of solar panels and the large area they cover will make them very visible.

This clearly contravenes Yarkhill NDP Policy Y12 – *'Poly-tunnels and large agricultural buildings and other rural business buildings will be supported in fields and agricultural holdings where there would not be significant visual intrusion within the landscape...'*

The development will have a visual Impact on local footpaths – even if *'glimpsed through trees'*: specifically Yarkhill Footpath YK12, Stoke Edith Footpath 1; Dormington footpath 5 and a number of footpaths in Weston Beggard all situated within 1km south of the Site. The photographs in the LVIA from various visual receptors along these footpaths show that the site will be visible, large and will not be mitigated by planting particularly in the late autumn/winter/early spring when trees are not in leaf, ie for half the year.

4. 40 years is not short-term or temporary but will alter the landscape for a generation.
5. We note and support the objections made by Herefordshire Council's Historic Building Officer relating to the impact of the proposal on the setting of the Grade I listed St Mary's Church and the importance of the view of the church in this natural and tranquil landscape.
6. Herefordshire is a rural county and many visitors come to experience the tranquillity and beauty of the landscape. The proposed development will erode the 'character and beauty of this part of the Herefordshire countryside and lessen its attraction for tourists.

HCS Policy E4 Tourism promotes *'Herefordshire as a destination for quality leisure visits by utilising, conserving and enhancing the county's unique environmental and heritage assets and by recognising the intrinsic character and beauty of the countryside'*. Tourism is *'worth £469m to the county's local economy (2011). Over 4.7 million visitors come per year mainly for short stays to take advantage of the outstanding countryside, rich heritage and cultural offer. This supports 8,480 jobs'*. (HSC Para 3.77) . Both Yarkhill and Weston Beggard NDPs recognise the importance of tourism to their local economies.

7. The land is mainly in flood zone 1 and partly in zone 2. It is likely that such a large expanse of hard surface, set at an angle will create unusual patterns of run-off and perhaps drainage channels which will affect the ability of the land to absorb water, exacerbate problems with flooding and have a knock on impact on the river and neighbouring land and roads. We note and welcome the comments from the Environment Agency, particularly the request for a more detailed Flood Risk Assessment based on 'correct climate change levels' in line with the EA West Midlands Climate Change Guidance 2003. We also note that the EA specifies that panels in Flood Zones 1 and 2 should be 600mm above the design flood level rather than the 300mm 'where possible' specified by the applicant.
8. As has been pointed out by other commentators this development does not benefit local communities whilst impacting their quality of life significantly.
9. Local communities have expressed their wishes to disallow this kind of industrial development through NDP policies and through the Herefordshire Core Strategy. The proposals are contrary to:
 - Yarkhill NDP Policies 11.12. and 13 and Objectives 1 and 2
 - Weston Beggard NDP, Objectives 1, 2 and 8 and policies WB, WB5, WB3
 - Herefordshire Core Strategy E4, SD2, LD1, LD2, LD4, SD2
 - NPPF Para 160, 180, 195, 200, 206
 - PPG Renewable and Low Carbon Energy Paras 007 and 013

CPRE has published two highly relevant reports (*Rooftop Solar Report 2023; Shout from the Rooftops 2023 and the Problem with Solar Farms*) arguing that rooftops would be the most suitable location for solar panels after which brownfield sites should be used. The obvious locations should be where the need is greatest, that is in built-up areas and the many brown-field sites that exist on the perimeters of built-up areas. Connections to the national grid in these areas would be more efficient and less expensive while not impacting on areas of the countryside that are valued and available for food production. Weston Beggard NDP supports this approach '*In terms of the provision of solar, the community seek non ground mounted panels attached to existing or proposed buildings to reduce their impact on the local environment.*' Para 7.45

Summary

The information provided by the Applicant fails to demonstrate that the long-term harm caused to this valued rural landscape by this large industrial development can be mitigated or that there is any benefit to the County from the installation of such a large-scale facility.

Yours sincerely

Nicola Forde
P.L.A.N.
Herefordshire CPRE