

Richard Haynes – Written Evidence (LUE0015)

Consultation response

1. INTRODUCTION

1.1 My name is Richard Haynes. I hold a BSc degree in Estate Management from the University of Reading and am a former Chartered Surveyor. I am currently a Trustee of CPRE Essex and write on their behalf.

1.2 Many of our members are concerned about the loss of highly productive (mostly Best and Most Versatile) agricultural land to industrial-scale solar facilities. Their concerns relate to both the adverse impact on rural landscapes and the effect on our ability as a nation to feed ourselves. Our comments therefore fall under two of the headings that you have outlined.

2. PRESSURES AND CHALLENGES

2.1 The recent war in Ukraine has given rise to two heightened priorities for the UK:

- The need for self-sufficiency in terms of energy production; and
- The need to become less dependent on imported food.

2.2 If utility scale solar is to be considered as one of the options for the production of renewable energy, then there is a potential conflict with the need to increase our home-grown food supply. Both uses require land. In terms of solar energy however the panels and other plant and equipment can potentially be located anywhere whereas food crops can, to a very large extent, only be grown on agricultural land and the better the land quality the greater the supply of food. Agricultural land is a finite resource and the best quality land is an even more restricted commodity. We believe that it is wrong that Best and Most Versatile (and much of our Grade 3b land) should even be considered for an industrial use when there are other options available in the form of either low grade land elsewhere or other forms of renewable energy such as nuclear or off-shore wind. Yet, time and again applications are coming forward for solar farm development on high quality land simply because of the ready availability of a cheap sub-station connection coupled with a willing landowner. It is sad and misguided that planning authorities and appeal

inspectors are ignoring the policy and guidance of the NPPF and the PPG and allowing such development to take place.

2.3 We are particularly concerned at the role of Natural England as a consultee in these applications. There is a statutory requirement for them to be consulted on any development that would lead to the loss of more than 20 hectares of Best and Most Versatile land. Their standard response however is to say they have no objection as the loss is only temporary (most solar farm agreements are for a period of 40 years). This is nonsense since the land will not only be taken out of food production for two generations but it is highly unlikely that the land will be in any fit state after 40 years to revert to agricultural use.

3. NATURE, LANDSCAPE AND BIODIVERSITY

3.1 If our farmland is a finite resource then so too are our rural landscapes and the flora and fauna that they support. Large scale solar farms are hugely damaging to our rural landscapes; to historic views and the setting of heritage assets. They are harmful to the wildlife within those landscapes (loss of habitat; blocking up of traditional routes for transitory animals; bird deaths; and the loss of soil quality through permanent shading and fixed rainwater run-off channels). The character of public rights of way is altered by security fencing and the intrusion of CCTV cameras while the setting of ancient woodland and other features that punctuate our landscape is significantly altered.

3.2 It is not just designated landscapes that should be considered in assessing the merits of a solar farm scheme. Our countryside is made up of huge areas of undesignated land of outstanding visual quality. The NPPF makes provision for the protection of these areas yet again this is so often ignored by planning authorities and appeal inspectors.

4. CONCLUSION

4.1 It is our view that utility scale solar should only be considered as a source of renewable

energy if it is located where there is no loss of productive farmland and no adverse impact to our rural environment.

Planning authorities and the Planning Inspectorate

should give much more weight to the views of local communities; to the guidance and policies contained within the NPPF and PPG; and that policy and guidance should be strengthened to prohibit solar farm development on productive farmland and where there is harm to a rural landscape.

Richard Haynes
April 2022