



the countryside charity

CPRE-ESSEX POLICY STATEMENT IN REGARD TO SOLAR FARMS

‘Meeting our energy goals should not be used to justify the wrong development in the wrong location and this includes the use of high-quality land. Protecting the global environment is not an excuse to trash the local environment.’

<https://questions-statements.parliament.uk/written-statements/detail/2015-03-25/HCWS488>

1.0 BACKGROUND

- 1.1** In terms of greenhouse gas emissions, the government is committed to achieving net zero by 2050. Such a commitment requires a fundamental change in our sources of energy including the generation of electricity. ‘Renewables’ will have a significant role to play but renewable energy sources, if not properly controlled, can have serious consequences for our natural environment, as alluded to in the Ministerial Statement above.
- 1.2** The government has recently published its Ten Point Plan for a Green Industrial Revolution in which point one deals with a switch to renewable sources of electricity. The Plan however, views renewable energy purely in terms of off-shore wind farms. No mention is made of solar farms. Central government has for several years shown only limited support for industrial scale land-based operations and national planning guidance indicates a strong presumption against solar farm development on the ‘best and most versatile farmland’ (classified as Grades 1,2 and 3A). Similarly, the BRE ‘Planning Guidance for the Development of Large Scale Ground Mounted Solar PV Systems’ also underlines the fact that national planning policy would not support development on the best agricultural land and specifically states that ‘The best quality land should be used for agricultural purposes’.
- 1.3** Essex County Council’s Climate Change Commission is yet to report formally but their recently published interim report states their ‘reservations about the loss of arable farming land’.
- 1.4** There can be no doubt that, cumulatively, PV panels can make a valuable contribution to our electricity supply and much more can be done at planning application stage to ensure that they are in-built in all new commercial developments and many housing schemes. Large scale industrial operations however require much more careful consideration. There is already clear guidance that the most productive farmland should be avoided; however, more control is required to avoid the immense harm that such development can do to our natural landscape and the setting of traditional buildings within it. Local planning authorities need to have policies in place to ensure that neither high quality farmland nor important landscapes are compromised - particularly so with regard to the visual ‘designated’ and ‘valued’ landscapes.

2 ISSUES

- 2.1 The Agriculture Act 2020 is to be applauded for its switch from Basic Payments to farmers to an Environmental Land Management scheme which incentivises environmental stewardship schemes such as tree planting and the creation of traditional habitats and ecosystems. It is made clear however that it is not intended that the scheme should apply to high-value agricultural land ‘in recognition of the importance of food production.’ This represents another indicator that the government recognizes the importance of reserving the best land for growing food. It is not considered acceptable therefore for local planning authorities and appeal inspectors to allow this land to be taken out of food production for the purpose of providing green energy. It is wasteful and unnecessary when many other non-productive opportunities exist for solar energy operations. Energy companies will often complain that a particular area is dominated by land in the ‘best and most versatile’ category and they have no alternative option. They do – develop in other areas of the country where land is less productive or, better still, concentrate on brownfield sites. The occasional grazing of sheep is also suggested sometimes as a continuing agricultural use by way of compensation but this is hardly significant when compared to the productivity of high grade arable land.
- 2.2 The loss of high quality farmland is not the only issue. Arguably of greater importance is the potential harm that these developments do to the landscape. Fields containing continuous rows of metal and glass bring a dramatic industrial scar to an otherwise rural environment which is then further damaged by perimeter security fencing, floodlighting, CCTV systems and a range of buildings housing all of the associated apparatus including the battery storage units. Traditional views often framing the distant setting of historic buildings such as churches are destroyed and the character of footpaths is altered for all time.
- 2.3 Taking land out of agricultural use does have benefits for wildlife. The monoculture of crops is removed allowing an element of bio-diversity. The absence of ploughing increases the earth worm population and insects flourish where grass is left to grow. These advantages are however, outweighed by the damage to traditional habitats through the dense development of industrial plant and infrastructure. Security fencing surrounding large areas of land removes traditional pathways for transitory animals and bird deaths are a common occurrence as large areas of glazing are mistaken for water. Grass does have to be mown and chemicals are used to control weeds and pests. The land is essentially changed from rural to industrial and habitats and the nature of local wildlife is consequently altered. A further concern is the potential impact on the quality of the soil. Large areas of solar panels will change the way that rainwater falls on the ground, air currents will change and large areas will be permanently shaded from sunlight. The earth is our biggest carbon store. It is unknown what impact these environmental changes will have on its ability to continue to store carbon and could potentially be a counter-productive feature in the battle to reverse climate change.

2.4 Solar energy companies usually lease their sites typically for periods of between 25 and 40 years. It is highly likely that the PV panels will, one way or another, be redundant before the expiry of the lease term. It is quite probable that more efficient sources of electricity will have been found rendering the panels obsolete and much of the land will no longer be required. Energy companies are quite happy to accept a reinstatement clause in the lease given that they rarely have to worry about a liability so far into the future. A landowner (and in some cases, a planning authority) will require a reinstatement bond but many that have been agreed have been worthless. There is therefore huge uncertainty as to whether these sites will ever be returned to agriculture or to a natural state. If PV panels have become obsolete it is quite likely that the operating company will have ceased to exist, so in that case and/or where any bond is worthless or inadequate, there will be uncertainty whether the landowner will undertake any reinstatement. In addition, the cost of de-commissioning and re-cycling is likely to considerably outweigh the value of what is created leaving an abandoned and derelict site. Such sites could then be classified as 'brownfield' and there will then be pressure to redevelop for housing despite their often unsustainable location.

3.0 POLICY

- The use of 'best and most versatile' agricultural land (Grades 1, 2 and 3a) for solar farms should be avoided in all circumstances.
- The redevelopment of brownfield sites for solar farm use is, in principle, to be encouraged.
- Support is also given to the use of planning conditions that require the inclusion of PV panels in the specification of new commercial developments and, where appropriate (not in Conservation Areas or similarly sensitive settings), new housing schemes.
- Applications relating to any proposed sites in rural areas should be accompanied by a comprehensive landscape impact appraisal and development which results in the loss, or change in character, of landscapes or landscape setting and views should be refused.
- Applications that result in the significant change in character of footpaths or other public rights of way should be refused.
- A wildlife impact assessment should also be required and any loss or changes to habitats should be properly mitigated.
- Any proposed new tree or hedgerow schemes should require semi-mature native species plants to ensure effective screening at the earliest possible date.

- All planning applications should be accompanied by a viability appraisal (including cost/benefit analysis) and an options appraisal which considers alternatives.
- A full land management plan should accompany all applications providing detailed information on the way in which the land will be maintained (grass cutting regimes; any use of pesticides/insecticides; animal grazing proposals; etc) and related conditions should be applied to any permissions granted.
- A reinstatement plan which identifies all of the key elements required to return the land to a natural state should be prepared and form a part of any planning application. This should provide details (related to best current practice) of the work required, the opportunities for recycling and an estimate of current cost.
- In all cases a bond should be provided as part of a legal obligation between the landowner and the local planning authority to cover the full cost of proper reinstatement, to be entered into upon commencement of any works.

Policy Approved 5 February 2021

CPRE Essex, registered charity no.1094178, is a company limited by guarantee, registered in England, no.4536412, which exists to promote the beauty, tranquillity and diversity of rural Essex by encouraging the sustainable use of land and other natural resources in town and country.

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