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Quantock Hills Area of Outstanding Natural Beauty (AONB) Position Statement: Solar PV development

Introduction

Commercial, field-scale solar photovoltaic (PV) development has the potential to have a significant adverse impact on the protected landscape of the Quantock Hills Area of Outstanding Natural Beauty (AONB). Applications for solar PV development within the Quantock Hills, or in views to and from the AONB, must be carefully considered and should clearly demonstrate that the key purpose and objectives of the AONB designation will not be compromised.

The Quantock Hills AONB Service recognises the value of solar energy and its contribution to renewable energy production but believes that large scale in-field developments are more appropriate within less sensitive landscape settings. There are other, smaller-scale opportunities for solar PV within AONBs.

The Quantock Hills AONB Service has a presumption against commercial large scale solar PV arrays within the protected landscape.

Climate Change

The need to reduce carbon emissions to tackle climate change is widely recognised and there are numerous measures in place to reduce energy use, improve energy efficiency and to reduce reliance on fossil fuels by generating electricity via renewable energy sources.

The United Kingdom has made a commitment to reduce carbon emissions to 30% below 1990 levels by the year 2020. It also seeks to reduce emissions by 80% by the year 2050.

Where protected landscapes are concerned, the environmental benefits of generating electricity from renewable sources must be considered against the potential adverse impacts that renewable energy infrastructure may have on the character and quality of our finest landscapes.

Financial Incentive for solar PV development

There are a number of financial incentives to encourage energy generation from renewable energy sources. One incentive is the Governments Feed in Tarriff (FIT) which provides developers with a financial subsidy towards solar PV developments. The tariff is index linked and is guaranteed for 25 years. The FIT has, to date, been a significant incentive for prospective developers and is applicable to solar PV developments generating up to 5MW. The FIT has seen step reductions since it was introduced. A development of 5MW will require approximately 15ha of land.

In the period spent drafting this document, there has been significant interest in identifying suitable sites for development, particularly when the tariff was at its highest. One development has been approved within Taunton Deane Borough, approximately 2 km from the boundary of the Quantock Hills and another application has been received (but refused) for solar PV development within Sedgemoor District, not far from the AONB boundary.

There have been a number of non-commercial, small-scale applications for solar panels on domestic properties, agricultural buildings as well as and in-field. This position statement is concerned with the AONB's position in respect of commercial developments. Smaller schemes will be considered within a future AONB Service position statement or guidance document.

Policy Context

The AONB Service is concerned that solar PV developments should not cause a threat to the character and quality of the AONB – be that through development within or beyond the AONB boundary. When considering applications for solar PV development, a number of policies from national to local scale will need to be carefully considered.

a) Planning Policy Statement 22 Renewable Energy

National Designations

PPS22 sets out the Government's national policy for Renewable Energy. With regard to National Designations, PPS22 states that ***"in designated areas, renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits"***.

Buffer Zones

Although PPS22 states that buffer zones should not be created around nationally designated areas to prevent the development of renewable energy projects; it clearly makes the point that ***"the potential impact on designated areas of renewable energy projects close to the boundaries will be a material consideration to be taken into account in determining planning applications"***.

b) South West Regional Spatial Strategy - Policy ENV3 Protected Landscapes

Although the current Government intends to abolish Regional Spatial Strategies, the contents of RSSs are still a material consideration in planning decisions.

Policy ENV3 states that ***"Particular care will be taken to ensure that no development is permitted outside the National Park or Areas of Outstanding Natural Beauty which would damage their natural beauty, character and special qualities or otherwise prejudice the achievement of National Park or Area of Outstanding Natural Beauty purposes"***.

c) Local Planning Policy

Each Local Planning Authority crossing the hills has a policy dedicated to conserving and enhancing the Quantock Hills AONB. An example is provided below from Taunton Deane Borough Council's current Local Plan.

Taunton Deane Local Plan Policy EN10

Policy EN10 states that ***"Priority will be given to preserving and enhancing the natural beauty of Areas of Outstanding Natural Beauty (AONBs). Development which would adversely affect the landscape, character and appearance of AONBs will not be permitted. Within AONBs, major industrial or commercial developments will not be permitted unless they meet the following criteria:***

a) The development would meet a proven national need; and

b) The development cannot be located elsewhere.

The protection of views to and from Areas of Outstanding Natural Beauty will be an important consideration”.

d) The Quantock Hills AONB Management (2009-2014) has a chapter dedicated to ‘Development and Planning’, with Policies, Objectives and Action Points focussed on conservation and enhancement of the landscape.

Solar PV Arrays and the Quantock Hills

The AONB Service is concerned about the potential for there to be a number of applications in and around the protected landscape and the impact, if approved, these developments may have (independently and cumulatively) on:

a) the character and quality of the hills; and

b) views to and from this nationally designated landscape.

Where a nationally protected landscape is concerned, Landscape and visual impacts are likely to be the most significant environmental effects of a solar PV development. Elements of solar PV developments that individually, or collectively, may result in adverse impacts on the AONB include:

- The geometric, non-agricultural character of development covering large areas;
- Reflectivity or ‘glint and glare’¹;
- Typically occupying south-facing exposed sites (therefore highly visible) to take best advantage of the sun’s energy;
- Supporting infrastructure e.g. buildings, access tracks and the inevitable cabling requirements for connection to the grid; and
- Incongruous fencing, security lighting and cameras installed to secure the site.

The hill and ridge landform of the Quantock Hills makes it is an exposed and highly visible landscape, characterised by an organic landform of rolling hills, plunging combs and open summits. As such its character does not naturally lend itself to accommodating the straight lines and overtly geometric forms that typify solar PV developments. Such development is highly likely to be at odds with the character of the strongly articulated, rounded shapes of the land and may have a negative impact on much-valued Quantock views.

It is important to note that boundaries demarcating protected landscapes very rarely reflect a dramatic and sudden change in character. As such, many areas beyond the AONB boundary share features and characteristics in common with the protected landscape and impart significant influence on the character of the AONB itself. Solar PV development in such areas may also pose a significant threat to the designated landscape.

There are also a number of landscapes beyond the AONB that are overtly different in character. These also make a significant contribution to the character of the Quantock Hills. An example is the vale landscapes that lie to the north and south of the Quantocks – forming a dramatic, low-lying setting to

¹ ‘Glint’ is the direct reflection of the sun and ‘Glare’ is a reflection of a bright sky and daylight. Glint is significantly brighter than glare.

the prominent landscape of the Quantocks. Views across the vale are a quintessential experience for residents and visitors of the AONB. Many people seek out the highest, most exposed points to take advantage of impressive views such as those across the Vale of Taunton Deane and beyond to Exmoor National Park for example, or across Bridgwater Bay to the Levels and Moors and on to the Mendip Hills AONB. The quality of the views afforded by these landscapes has a direct impact on enjoyment of the Quantock Hills and their influence on the hills must not be underestimated. Unsympathetic, incongruous development in these landscapes can act as a visual detractor; having an adverse impact on the character of the AONB, on the quality of views and on people's experience of this special place.

It is essential that proposals for commercial solar PV are rigorously assessed in terms of their likely impacts on the nearby protected landscape so that any approved scheme does not threaten the key purpose of conserving and enhancing the natural beauty of the Quantock Hills.

Solar PV developments could also have serious implications for ecology e.g. habitat loss, fragmentation and displacement of species. There is also a potential threat to the historic environment e.g. assets such as sites, monuments, buildings, and landscape above and below ground. Both ecology and historic environment will need to be considered alongside landscape and visual issues.

In the event of planning applications being submitted for solar PV developments within or close to the AONB, the following points should be given due consideration:

- ***Local Planning Authorities should liaise with the Quantock Hills Landscape Planning Officer if a screening request is made by a land owner/developer.*** The AONB Service will be able to impart local knowledge and useful advice e.g. in relation to viewpoints it considers should be assessed as part of any landscape and visual impact assessment.
- ***The Local Planning Authority dealing with an application should be satisfied that the applicant has fully explored alternative sites,*** further away from the protected landscape, where impacts may be less significant.
- ***The Local Planning Authority may determine the applicant does not need to undertake a full Environmental Impact Assessment but the AONB Service would always expect a Landscape and Visual Impact Assessment (LVIA) to form part of the planning application.*** The developer's application should consist of a thorough, un-biased assessment of impact on both the character of the AONB and on views to and from the protected landscape. The method of assessment should be robust and transparent and reflect best practice, based on current guidance (currently the 'Guidelines for Landscape and Visual Impact Assessment – Second Edition' 2002).
- ***Consideration should be given to the cumulative effects of solar PV development*** e.g. if there are other sites that are proposed or have been granted that are also in views to or from the AONB landscape. These developments may share the same views shed but, if not, consideration must also be given to the impact of the sequential viewing experience i.e. as people pass through the landscape.
- ***Mitigation measures for minimising landscape and visual impacts should be clearly illustrated*** (supported by a detailed landscape plan) and these should respond to the character of the landscape.

- ***The potential harm to wildlife and the historic environment should be fully explored and specialist advice sought where necessary.***

References and further information

Guidance:

The Landscape Institute and Institute of Environmental Management and Assessment 'Guidelines for Landscape and Visual Impact Assessment (Second Edition)', 2002.

National to Local Policy:

Planning Policy Statement 22: Renewable Energy

Draft South West Regional Spatial Strategy

Taunton Deane Borough Council

Sedgemoor District Council

West Somerset Council

Management Plan:

Quantock Hills Area of Outstanding Natural Beauty Management Plan (2009-2014)

Other information:

The Development of Large Scale Solar PV arrays in Cornwall (January 2011)

Draft National Position Statement Photovoltaic Arrays (NAAONB, September 2011)

This position statement has been produced by the Quantock Hills AONB Service and is intended for use by Development Management Officers, developers, and their agents. It is a guidance document and has not been adopted as policy by any of the Local Planning Authorities crossing the hills.