

Planning Application - 24/04156/EFUL – West Harptree Parish Council Consultation Response

Application Reference: [24/04156/EFUL](#)

Application Address: Parcel 15628, Stowey Road, Stowey, Bristol, Bath And North East Somerset,

Proposal: Construction, operation and decommission of a 49.9MW capacity solar farm on land south of Stowey Road, consisting of ground mounted solar photovoltaic (PV) arrays and associated development including transformers and switchgear, electrical substations, substation compound, a telecommunications mast, cabling, utilities, access tracks, perimeter fencing, landscaping and areas for biodiversity net gain (BNG) enhancement.

Response:

West Harptree Parish Council **OBJECTS** to this application, based on the following details.

We appreciate and support B&NES in seeking to promote renewable energy however there is plenty of evidence that solar farms present a material threat to our environment. We believe that future generations will look back on decisions to permit solar farms on agricultural land and say that we were foolish and short sighted.

We have compared B&NES planning policy to the approach being taken by other planning authorities, relevant research and national policy and concluded that a) the proposed development is inappropriate in present form;

b) B&NES has not reflected sufficiently on the threats solar farms present to our environment; and

c) the development would set an inappropriate precedent within B&NES,

for the reasons set out below.

Too large

At least 33% of the proposed development is on our 'best and most versatile' (BMV) agricultural land and while it does not preclude it, the NPPF guides renewable energy development away from BMV land.

If the development is to proceed, it should be reduced in scale and limited to the western 2/3rds of the current site, thus excluding the BMV land adjacent to Nanny Hurn's Lane.

Impact on Nature Recovery Networks

The proposed development lies within several designated Nature Recovery Networks.

Policy NE5 is clear that development proposals will be expected to demonstrate that a positive contribution will be made to regional Nature Recovery Networks and that local ecological networks will be maintained or created through habitat creation, protection, enhancement, restoration and/or management.

The application set out no relevant evidence, analysis, plans or monitoring proposals.

Absence of plans for execution and operation

The application is devoid of any explicit plans and proposals for construction and operation.

We note that Wiltshire Council has had policy guidance in place for nearly four years requiring developers to submit various plans **before** a planning application for a solar farm will even be considered, including;

- a) Specific Surveys;
- b) Ecology Mitigation and Enhancement Plan;
- c) Landscape and Ecology Management Plan;
- d) Construction Ecology Management Plan; and
- e) Monitoring – a scheme of monitoring focused on the Ecological Mitigation Plan

(<https://www.wiltshire.gov.uk/media/6812/Solar-PV-Farm-Ecology-Advice-Note-July-2021/pdf/SolarPVFarmEcologyAdviceNoteJuly2021.pdf?m=1721293847483>)

We encourage and indeed formally request the adoption of a similar approach by B&NES, requiring plans **before** consent not as post consent conditions. The developers need to prepare plans and fully cost construction, execution and operation before consents.

Should B&NES be minded to grant consent for all or part of this site, the consent must also include appropriate conditions (see the report to the Welsh government noted below) covering;

- a) Whole lifetime site condition
- b) Construction phase
- c) Temporary compound decommissioning

Absence of plans for decommissioning

Policy CP3 is clear in requiring that, in order to secure planning consent, there must appropriate plans and a mechanism in place for the removal of the technology on cessation of generation, and restoration of the site to its original use or an acceptable alternative use.

In this context, we note the report to the Welsh Government: “The impact of solar photovoltaic (PV) sites on agricultural soils and land quality,” dated March 2023 which provides a useful (and frankly quite alarming) summary of relevant research on the various adverse impacts of solar farms.

(<https://www.gov.wales/sites/default/files/publications/2023-08/impact-solar-photovoltaic-sites-agricultural-soils-land-spep21-22-03-work-package-4.pdf>)

The applicant has made many wholly unfounded claims in the application that are not backed up by established research, such as;

i. “The Proposed Development will be compatible with sheep grazing ensuring that agricultural use of the land can be retained as well as providing opportunities for rotational wildflower seed harvesting”;

ii. “The Proposed Development provides a long-term break without intensive arable production where soils can regenerate bringing about improvements in soil health, structure and levels of organic matter”;

iii. *“The Proposed Development has the potential to deliver wider environmental benefits such as improvements to soil structure and health, carbon sequestration and habitat and biodiversity improvements by avoiding cultivation, artificial fertiliser or pesticide use”;*

iv. *“In the context of BMV land, the Proposed Development does not constitute a permanent removal of the land from agricultural production. Nonetheless it is a fact that when the land returns to agricultural use the soils will be at least as productive as they were prior to the Proposed Development and potentially improved ... therefore, it is considered that there will be no significant effects relating to soils and agriculture as a result of the Proposed Development”;*

v. *“The Proposed Development is not considered to pose an unacceptable risk to human health or the environment during construction, operation or decommissioning”;* and

vi. *“When the land returns to agricultural use the soils will be at least as productive as they were prior to the Proposed Development and potentially improved”*

The report to the Welsh Government evidences that these claims are misleading and moreover that;

a) there will be significant zinc contamination of the topsoil from the buried parts of the support structure, especially given the very long working life being proposed;

b) there will be significant soil compaction on the site as a whole, as a consequence of construction, maintenance and decommissioning.

As a temporary consent, it is vital that the applicant demonstrates **before** an application can be considered precisely how contamination and soil compaction will be remediated, how this will be funded and also provide appropriate guarantees. Any consent granted must bind the applicant to explicit plans for decommissioning.

We do not want, and neither must B&NES accept, even the slightest risk of a situation where the solar farm ceases to be economically viable and/or the developer ceases to trade, leaving behind a vast array of metals, concrete, stone and plastics spread across 58ha of beautiful countryside