

North Dairy Farm Solar Proposals
Land at North Dairy Farm, Pulham, Dorset
for the 'Save Hardy's Vale' Campaign
Landscape Statement Text
Planning Application Review
665 LS Text Rev P3

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Document Control

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1 Scope and Terms of Reference

- 1.1 This report has been prepared by Philip Hanson CMLI, a chartered landscape architect of The Landscape Practice, a registered practice of The Landscape Institute on behalf of Save Hardy's Vale, an informal, local community group. Save Hardy's Vale objects to the proposed solar farm development on land at North Dairy Farm in respect of planning application no. P/FUL/2021/01018. This report addresses landscape and visual issues related to the application and should be read in conjunction with Wyvern Heritage and Landscape's Heritage Statement also prepared on behalf of Save Hardy's Vale.
- 1.2 The application site hereafter referred to as the 'Site' is a proposal for the development of a 77Ha solar array with transformers, ancillary buildings, access tracks, fencing, a substation and enhancement mitigation.
- 1.3 The purpose of the report is to:
 - Briefly assess relevant landscape baseline information.
 - Review relevant submitted Landscape and Visual information and test against policy and guidance.
 - Examine Site visibility to review the measure of development exposure.
 - Assess potential development impact on the landscape.

2 Report Summary

- 2.1 The detail of the report substantiates the following summary:
 - 2.1.1. The area is overtly rural and of high visual quality and tranquillity. The Blackmore Vale is a pastoral landscape well known for dairy farming. The quality and composition of the land is particularly well suited to this type of agriculture. Some of the best and most successful organic dairy farms in the country are located in close vicinity to the Site.
 - 2.1.2. The landform is large scale but the land use is small scale. The Dorset Area of Outstanding Natural Beauty (AONB) lies at its closest point 1.3kms south of the Site to include the escarpment which forms a sharp incline and dramatic backdrop to the rolling foothills and the gently undulating land of the Vale. There is intervisibility between the AONB and the Vale which, on account of the large scale landform and topography, forms the setting for the Site. There is also intervisibility between the Site and Hazelbury Bryan conservation area located approximately 750m east of the Site. Both the AONB and the Vale are affected by the proposed development.
 - 2.1.3. This is a sensitive landscape as set out in character assessments and in the Land Use Consultants *Landscape Sensitivity to Wind and Solar Development in North Dorset District, May 2014* (LUC Study) prepared on behalf of the Council in respect of solar renewable proposals in North Dorset, which highlights high sensitivity to larger scale solar park development greater than 30Ha. This has also been verified by field visits to the local

area and through local knowledge.

- 2.1.4. This part of the Blackmore Vale, the area which would be affected by the development proposals, is a valued landscape for the purposes of National Planning Policy Framework (NPPF), Paragraph 170a. This is mainly, but not exclusively, because of its perceptual qualities. It is a robust and intact landscape with a pastoral and tranquil character. It has long standing dairy farming traditions, historic association between escarpment located Iron Age hillforts which have directed the evolution of the Vale's agriculture and settlement patterns, and internationally renowned cultural associations of Thomas Hardy and William Barnes. The related tourist trade is strong.
- 2.1.5. The submitted Applicant's Environmental Statement (ES) generally underestimates Site visibility in the wider landscape and therefore fails to record a fair and representative assessment of views in accordance with Guidelines for Landscape and Visual Impact Assessment (GLVIA), including those to and from the Dorset AONB. This in turn affects the assessment of landscape and visual effects and their significance in accordance with Environmental Impact Assessment (EIA) regulations.
- 2.1.6. This is an industrial scale of proposed development alien to the highly sensitive, undeveloped and rural location (The LUC 2014 Study categorises arrays over 30Ha as large scale). The proposed development Site covers a total of 77Ha (total) of which approximately 55Ha would contain solar panels, fencing, numerous ancillary buildings and structures, a large substation, large pylon and vehicular access tracks. The land is gently and smoothly undulating and not suited to the rigid line and form of panels which in contrast will form jagged, stepped and unnatural outlines with the existing smooth, flowing contours.
- 2.1.7. The rigid form, arrangement and patterns and the monotone colours of the panels, which would be visible in large single blocks, would be discordant with the landscape character and the existing small scale landscape patterns within the gently undulating ground.
- 2.1.8. The study for glint and glare from the solar panels does not include an assessment of public areas (apart from local roads) and in particular the very likely harm it may cause to the Dorset AONB and areas of elevated ground on the escarpment where there are panoramic views over the area of the proposed development Site.
- 2.1.9. Proposed mitigation enhancements submitted as part of the application are meagre in relation to the scale of the proposed development. They provide ecological benefits no more extensive than what might be expected as the good husbandry of a responsible farm landowner without considering the proposed development. They also do very little in terms of protecting the visual amenity in respect of the development proposals as confirmed by the submitted photomontages - ES Appendix 6.5, Files 1 to 4.
- 2.1.10. Renewable energy is an important part of our need to address the challenge of climate change but this in itself should not in any way destroy or damage the best parts of the environment we are actually trying to save. National and Local planning policy recognises this in directing large scale solar renewable developments to brownfield sites and generally requires the overriding protection of the environment.
- 2.1.11. Whilst there are visual impacts from the proposed development including those on the Dorset AONB and

Hazelbury Bryan conservation area, it is landscape character and in particular its perceptual qualities which would be most damaged by the development proposals causing substantial harm to the inherent character of the Blackmore Vale and the setting of the AONB.

2.1.12. This report concludes that the proposed development contravenes national and local planning policy as to site suitability and mitigation and in particular with regard to enshrined and overriding protection of the environment and the provisions of NPPF, Paragraph 170 and North Dorset Local Plan, Policy 22, which cannot be satisfied.

2.1.13. The industrial scale, form and nature of the proposed development would cause substantial harm to the small scale land use of the receiving landscape. It would cause visual exposure locally and to the Dorset AONB and unacceptable harm and intrusion particularly to the perpetual qualities of this valued landscape of high quality and tranquillity. Resultant detrimental impact and effect on landscape character and heritage assets would cause sufficient and significant harm to conclude that this application and development type in this location is unacceptable.

3 Relevant Baseline Information

Submitted Documents

3.1 The ES Chapter 6, section 6.7, suggests the published landscape character assessments do not present an accurate description of the area and make their own assessment which in parts is difficult to reconcile with the actual situation. This states that mixed use agriculture and removal of hedgerow boundaries to create larger arable fields on the Site is typical of the wider landscape, when it is not. Of the local area, it describes *'numerous woodland blocks and spinneys that provide a robust landscape structure that imparts a wooded character to the landscape'*. This is not an accurate description of the surrounding predominantly pastoral landscape. It acknowledges the sense of tranquillity but states *'this may be interrupted by the sound of a tractor or military aircraft'*. The former is insignificant and the latter not a common occurrence. Certainly neither diminish the distinct and strong sense of tranquillity in the area. It continues to describe a *'utilitarian element to the local landscape which is exhibited by large functional barns....high voltage overhead lines.... and an electrical substation approximately 2.77km to the northwest...and small solar array (0.5ha)'*. The scale of these does not contribute to a significant utilitarian element in the wider landscape. However, and ironically, the development application proposes all of these features in vastly increased quantities over 77Ha of the receiving landscape.

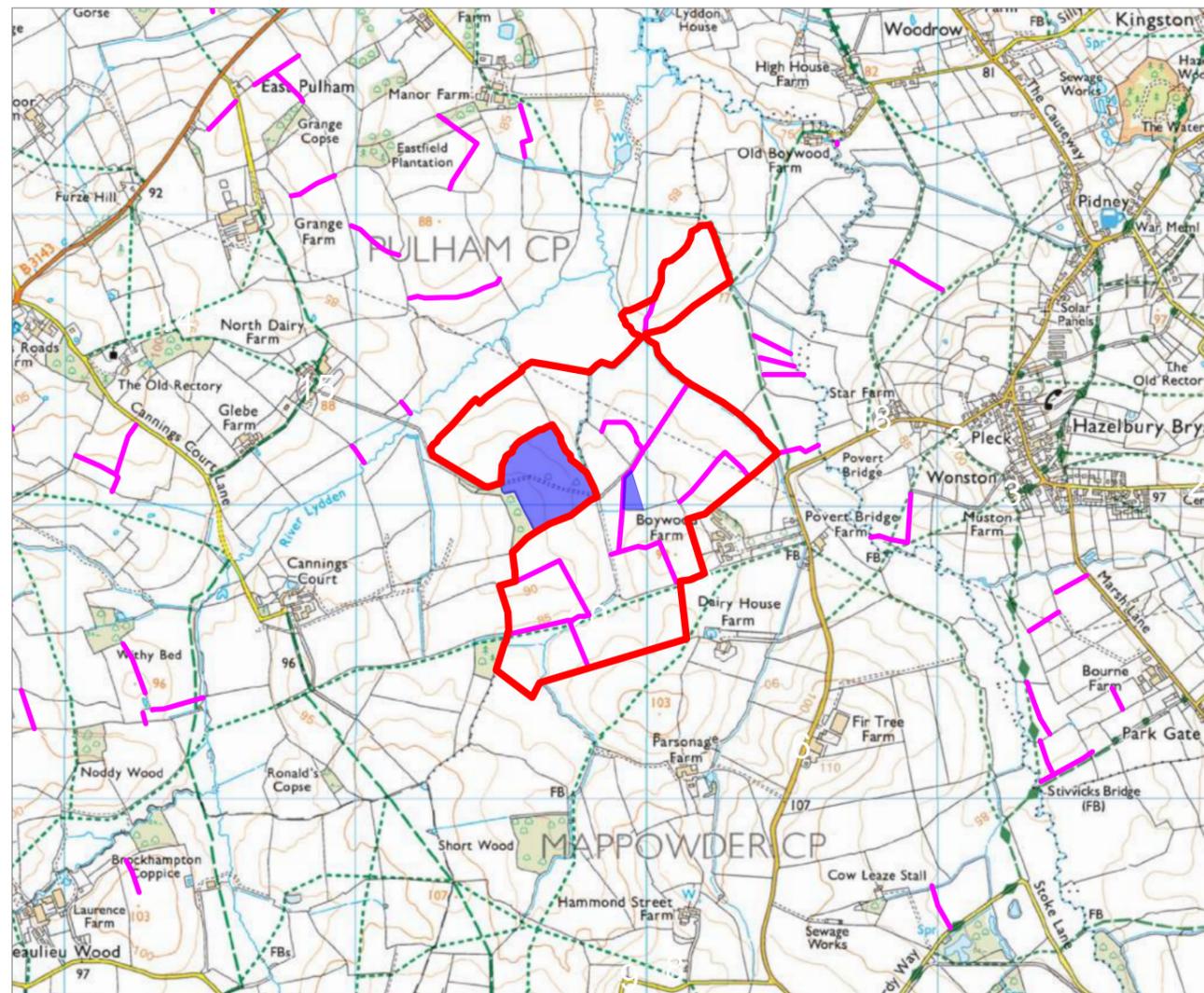
A Brief Baseline Assessment

3.2 The Site is located in the Blackmore Vale, part of the Stour valley which is well recognised regionally and historically over generations as an area of small scale dairy farming. The low lying Vale is bounded by higher watershed land between the Rivers Stour and Yeo to the north, chalk hills of Cranborne Chase to the east and



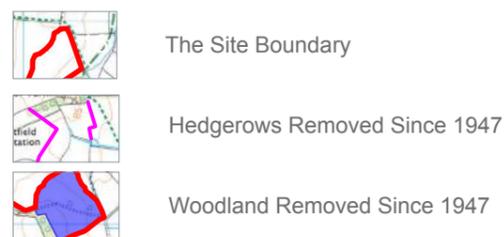
Source: Google Earth

Figure 1 - Aerial Photograph Showing Immediate Site Context, Field and Landscape Patterns



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 Information source: Dorset Explorer

Figure 2 - Vegetation Removal



the dramatic chalk ridge escarpment to the south, which in closer proximity is more relevant to the Site and the surrounding area. The River Lydden and tributaries drain the surrounding area from issues at the base of the chalk downs escarpment joining the River Stour at Sturminster Newton approximately 7.5kms north east of the Site. Seasonally wet, moderately fertile clay soils create a uniform, lush and pastoral landscape, particularly when viewed from higher ground, which has been largely unchanged for generations. The more complex underlying geology creates undulating ground which diminishes in intensity northwards from the escarpment foothills. This also defines the settlement pattern which is mainly confined to greensand and limestone ridges of the undulating ground above the flatter stream and river corridors. This forms a largely undeveloped area on which the Site is broadly centred.

3.3 The setting includes three Landscape Types of Dorset Council's Landscape Character Assessment. Two straddle the Site and form the immediate setting - the flatter Clay Vale to the north and Rolling Vales whilst the Chalk Ridge/Escarpment forms the backdrop to the setting farther south. These describe a unified, intact, harmonious, rural, secluded and largely undeveloped landscape of high quality and tranquillity. Relevant points from the published assessments of the two forming the immediate setting can be summarised as follows:

3.4 Clay Vale Landscape Type

- Flat to gently undulating bowl shaped clay landform flanked by hills and ridges
- Homogenous pasture with a patchwork of small to medium sized fields, small woods ribbons of trees and dense trimmed hedgerows
- Distinctive hedgerow oaks in distinctive dotted pattern
- Long tradition of dairy farming
- Twisted narrow lanes lined with thick hedgerows
- Evenly scattered hamlets, small villages and farms
- Ponds important for protected species especially great crested newts
- A peaceful, undeveloped and secluded rural atmosphere

3.5 Rolling Vales Landscape Type

- Undulating farmland transition between clay Vale and the escarpment
- Landform more twisted towards the foot of the escarpment
- Chalk escarpment forms a distinctive backdrop to the area
- Varied irregular pattern of predominantly pastoral fields, copses dense hedges and occasional arable
- Twisting hedge lined lanes and narrow verges
- Settlements with frequent local stone building materials typically on elevated ground overlooking the vale with many scattered farmsteads
- Many small streams and brooks
- A tranquil, secluded and unified landscape

3.6 Stated management guidelines and objectives for both Landscape Type areas are the retention and restoration

of landscape patterns and the overriding key objective of conserving the rural and tranquil nature of the area.

- 3.7 The Chalk Escarpment Landscape Type is also an important component of the setting and a key guidance note urges to 'identify, protect and enhance important views to and from the ridge/escarpment'.
- 3.8 The Site and surrounding area is overtly rural, although without recognised landscape designation it is of high visual quality and special value. The area has recently been considered to be included in the potential Dorset National Park currently being promoted.
- 3.9 Irregular field pattern and land use is small scale and with a sense of some intimacy, although in contrast landform is large scale and there are views across the area from elevated ground within the Vale. The escarpment backdrop towards the south is a distinctive and noticeable feature from the Vale. The published documents portray an accurate description and assessment of the local area, and the management guidelines and objectives are critical to its conservation.
- 3.10 The Site character differs to the general surrounding character. There is a higher proportion of arable fields and some of these are larger than those in the area. Comparing 1947 aerial photographs with the current situation reveals approximately 2.4kms (2,415m) of hedgerow field boundaries and a small woodland of approximately 0.68Ha (6,767m²) have been removed from within the Site creating generally larger fields than those generally typical of the area. Residual hedgerow oaks remain stranded within the arable fields. A large part of Humber Wood (approximately 6.58Ha/65,803m²) just outside and west of the Site boundary has also been removed. This is different to the general surrounding landscape pattern and land use which has largely been unaltered and has remained broadly intact and unharmed over generations - see Figure 2, Page 4.

4 Landscape Value and Sensitivity

Submitted Documents

- 4.1 The ES Chapter 6, Paragraph 155 onwards examines landscape value but incorrectly considers the value primarily of the Site and not the wider area of receiving landscape likely to be affected by the development proposals. Consequently, this is an inaccurate assessment which underestimates landscape value and demonstrates a lack of understanding of the area.

Local Landscape Value

- 4.2 This is a relatively unchanged landscape of high quality and tranquillity even though it has no official designation. GLVIA Paragraphs 5.26 and 5.27 is clear and sets out: 'The fact that an area of landscape is not designated nationally or locally does not mean that it does not have any value.' 'Landscape Character Assessments

and associated planning policies and/or landscape strategies and guidelines may give an indication of which landscape types or areas, or individual elements or aesthetic or perceptual aspects of the landscape are particularly valued.'

- 4.3 All landscapes are likely to be valued to a degree but it is the special qualities which make this distinctive. The following valuation considers an assessment of the special qualities of the setting of the Site, the landscape likely to be affected by the development proposals. This uses the same Guidelines for Landscape and Visual Impact Assessment (GLVIA) methodology and assessment scale as ES Chapter 6 to determine value.

Figure 3 - Landscape Value Table

Assessment of Factors which Contribute towards Landscape Value	
Criteria	Observations/Comments/Value
Landscape Quality (condition)	A relatively intact pastoral landscape which has retained patterns and characteristic elements over centuries which constitute its quality and condition. The character is different but the quality of the landscape between the AONB and parts of the Vale is comparable. There is more settlement and some field boundary conservation and management has some signs of neglect. Organic farming practices are present. This is considered overall to be Good .
Scenic Quality	The area is recognised regionally and historically as a dairy farming, pastoral landscape, sparsely settled and with few detractors. The Vale is viewed as a whole from several recognised, panoramic viewpoints from the AONB escarpment as indicated on OS Maps. These are of importance on a County, if not regional level. This is considered to be Good .
Rarity	There are no particularly rare aspects to the area, although the combination of the small scale lush, undulating, pastoral landscape with strong patterns contained by the bold escarpment is distinctive and identifiable. There are some of the best and most productive organic dairy farms in the country within close vicinity of the proposed development Site. This is considered overall to be Good to Ordinary .
Representativeness	The area has a long and well known tradition of dairy farming which within a strong and easily recognised and identifiable underlying geology has moulded the landscape's features, elements and its particular and distinctive lush character for centuries. It is anecdotal but it is said that Thomas Hardy, who cherished and knew the Vale's landscape intimately, could stand on the escarpment today and still identify features present in his lifetime. This is considered overall to be Good .

Assessment of Factors which Contribute towards Landscape Value	
Criteria	Observations/Comments/Value
Conservation Interests	As would be expected, significant wildlife is recorded in the area including otters, kingfishers, herons, brown hares, deer, barn owls and great crested newts and much associated with the abundant network of streams and rivers. Iron Age forts at Dungeon Hill, Nettlecombe Tout and Rawlsbury Fort on higher ground were regionally and locally important influences on the settlement pattern of the Vale and the subsequent medieval enclosure and agriculture arrangement evident now. This is considered overall to be Good to Ordinary .
Recreation Value	The area is well served with public rights of way and (barring often waterlogged ground along low lying stream corridors) are well used (as evidenced on field visits) not least because of their significant scenic and cultural interests. The escarpment footpaths overlooking the Vale and the setting are of county importance - The Dorsetshire Gap, an important historic, track junction, is a well known and popular vantage point of the Vale. The Hardy Way and Wessex Ridgeway long distance paths both have important scenic and cultural links. This is considered overall to be Good .
Perceptual Aspects	Thomas Hardy's 'Vale of the Little Dairies' which he loved is well known regionally as a relatively unchanged, overtly rural, tranquil, small scale, lush, green and pastoral landscape. The perceptual qualities of a dairy farming, pastoral landscape are characteristic and inherent special qualities of the Blackmore Vale. This is considered to be Good .
Associations	A strong history of dairy farming which is harmonious with the landscape. Thomas Hardy's Tess of the D'Urbervilles is set in the Blackmore Vale. Sense of place and the local landscape are crucial to his novel. This is of international renown and following - Tourists come from all over the world to walk the Hardy landscape of the Vale. William Barnes was born and brought up in the Blackmore Vale. His poetry is passionate about the Vale landscape, written in the local dialect. This is considered to be Good .

4.5 The setting of the Site and the surrounding area is undoubtedly a valued landscape for the purposes of reference to NPPF, Paragraph 170a and North Dorset Local Plan, Policy 4.

Landscape Sensitivity

4.6 The LUC Study measures sensitivity and susceptibility of the landscape to a range of solar PV developments site areas. The rating for large scale solar PV developments over 30Ha (the development proposal is 77Ha) for the two Landscape Types Clay Vale and Rolling Vales is the **Highest** sensitivity on the scale, and for very good reason. A review of the LUC Report in relation to the receiving landscape of the Site development proposals suggests an accurate assessment of both Landscape Types and this can be tested precisely against the methodology criteria.

4.7 The LUC Report does state that Site specific considerations may be taken into account. ES Chapter 6, Paragraph 52 dismisses the report as a 'district wide' assessment, despite its more detailed assessment of character areas and types, which makes it entirely commensurate with the scale of the Site's setting and the receiving landscape potentially affected by the development proposals. ES Chapter 6 uses the LUC Report methodology assessment headings to produce a separate judgement at Section 6.8, but varies between assessing just the Site for some headings and the Site and surroundings for others, muddling field patterns with landform, visual exposure with scenic value, and making incorrect assumptions all combining to arrive at an inaccurate assessment. This evaluation should be based on the area of the receiving landscape which would be affected by the development proposals in order to arrive at a fair assessment, and not just on the Site.

5 Review of Site Visibility

Zone of Theoretical Visibility

5.1 Whilst understanding its use limitations, the submitted ZTV, ES Chapter 6 Appendix, Figure 6.3 fails to indicate areas where there is actual visibility of parts of the development Site. It also does not include the full setting of the Site and the AONB escarpment area south of the Site which would include vital visibility information and indicate areas of concern for further investigation as requested by the local planning authority.

5.2 ES Chapter 6, Paragraph 133 excludes security cameras (noted in the text as 2.5-3.0m high at 50m centres although drawings show 6m high) but does not indicate if the 6.7m high substation equipment or 10m high pylon referred to has been included. However, they are illustrated and are visible on the submitted photomontages 1-4 at ES Appendix 6.5.

Site Visibility

5.3 GLVIA, Paragraph 6.19 states that selected viewpoints should be representative of Site visibility and include specific and illustrative viewpoints where appropriate. Landscape Institute Technical Guidance Note, Paragraph 1.2.9 states: '*Visualisations should provide the viewer with a fair representation of what would be likely to be seen if the proposed development is implemented and should portray the proposal in scale with its surroundings. In the context of landscape/townscape and visual impact assessment, it is crucial that visualisations are objective and sufficiently accurate for the task in hand. In short, visualisation should be fit for purpose.*'

5.4 ES Chapter 6 generally underestimates Site visibility and does not present a fair and representative impression of visual exposure within the affected landscape setting. A high proportion (8 out of 22) of the submitted Viewpoint Photos are from locations where the Site is not visible and in certain cases locations from where there is more representative Site visibility a short distance from the selected location are ignored. Certain

specific viewpoints, which are critical to the assessment, particularly from the Dorset AONB, have also been omitted.

- 5.5 ES Chapter 6, Paragraph 8 acknowledges that the Site lies within the setting of the AONB. Paragraph 58 repeats from the AONB Management Plan: *'one of the special qualities of the AONB is that the ridgetops and escarpments allow the observer uninterrupted panoramic views to appreciate the complex pattern and textures of the surrounding landscapes'*. ES Paragraph 68 notes Dorset Council's concern for the visibility from the AONB during the consultation process: *'The significance of these views needs to be assessed in detail...'*. ES Paragraph 141 states: *'There are only three distant views of the Site from the AONB (but provides only two photo viewpoints) and this is limited to sections of PRoW on Rawlsbury Camp Hill Fort/Bulbarrow Hill, Dungeon Hill Fort and Ball Hill.'* This is an incomplete representation of views from the Dorset AONB escarpment from where there are numerous open and panoramic views over the Vale towards the Site.
- 5.6 Underestimating Site visibility leads to an inaccurate assessment of the impact and effect the proposed development would have on the receiving landscape, not least because ES Chapter 6 relies heavily on Site visibility and exposure in its judgements. Therefore, the conclusions of the report do not represent an objective or fair assessment.
- 5.7 Due to the scale of the proposed development Site and its spread over the landscape, it is rare for the whole development to be seen from a single viewpoint. In some of the views, the fact that the whole extent of the Site is not visible leads to the impression that the effect of development is diminished. In fact, from most locations just a view of part of the development is sufficient to have a significant (adverse) effect.

Comment on Individual Submitted ES Photo Viewpoints

- 5.8 Submitted ES Photo Viewpoint 2 (also Photomontage) - A view from the southern edge of Hazelbury Bryan conservation area showing a partial view of the Site. Less than 100m farther west of this viewpoint on the same footpath reveals a more open view of the Site which includes field 4 - See TLP Viewpoint 8.
- 5.9 Submitted ES Photo Viewpoint 5 - Despite the fact that the ES recognises the importance of the setting of the AONB, which the Site clearly lies within, this is the only photograph showing potential development Site exposure from the main part of the AONB escarpment. The photograph is misleading in terms of representativeness in portraying both the amount and type of visual exposure of the development Site from this area of elevated ground within the AONB. The viewpoint photograph gives an impression of merely glimpsed views from the escarpment, but there are many more, better located and well known vantage points with open panoramic views over the Vale towards the proposed development Site. Just 250m east of this Photo Viewpoint is one example - see TLP Viewpoint 5.
- 5.10 Submitted ES Photo Viewpoint 6 - The viewpoint photograph does not show the full extent of the Site in the

view and describes or suggests this view as being available only close to Fir Tree Farm. The ES Chapter 6 in its summary describes views as *'limited to a very short section to the front of Fir Tree Farm where the hedges are lower'*. However, there are views of the Site for a stretch of approximately 0.75kms along this lane. It is foreseeable that receptors would include recreational walkers, (this route may form part of a circular walk as evidenced on a field visit) bicycle and horse riders as well as motorists. Motorists may also have passengers whose eyes may not necessarily be *'on the road ahead rather than the view'*. - see TLP Viewpoint 9.

- 5.11 Submitted ES Photo Viewpoint 19 - This photograph is misleading in its representation of Site visibility. Less than 50m farther west on this public footpath N46/20 reveals extensive 180 degree, open views of the proposed development Site. Large areas of development structures would be visible and at close range being oppressive on the footpath but also obstructing views from the Site towards the Dorset AONB - see TLP Viewpoint 20 on the definitive footpath and TLP Viewpoints 18 and 19 on the diverted footpath route. Visual exposure on the footpath is mentioned briefly in the ES Chapter 6 text but is not adequately described or properly, photographically recorded. As a consequence, the visual effect of development is not adequately assessed. Directly south of Photo Viewpoint 19 there are additional views into the Site from public footpath N46/19. See TLP Viewpoint 21 less than 100m south east and TLP Viewpoint 10 approximately 425m south west of this Photo Viewpoint 19 location from where there are views into the proposed development Site.
- 5.12 Submitted ES Photo Viewpoint 20 - The photograph text states: *'the intervening vegetation in the form of field boundary hedges enclose the view and obscures most of the site from view'* is to an extent true. However, what it doesn't say is that the Site is visible in the foreground and development proposals would be in full view. This under represents the impact of the proposed development which would be a 180 degree view of the Site and a 7.25Ha (17 acres) field of solar panels and ancillary equipment at close range occupying the majority of the view - See TLP Viewpoints 16, 17, 18,19, and 20. Less than 100m west of this is location on public footpath reveals a 360 degree view of Site development proposals.

A Review of Site Visibility

- 5.13 The Landscape Practice has carried out a review of the visibility of the proposed development in the surrounding landscape to determine possible areas of visual exposure and to compare the findings with the submitted ES Photo Viewpoints.
- 5.14 Field visits have been made 17 December 2020, 22 January 2021 and 17 May 2021. The weather was sunny and part cloudy on each occasion with reasonable visibility. A Canon EOS 6D Mark 2 full frame sensor with 50mm lens camera was used.
- 5.15 A representative selection of viewpoint locations has been identified in addition to, and to supplement, those missing from the submitted ES. These additional viewpoint locations provide a more balanced and representative assessment of the visual exposure of the Site and thence a fairer assessment of the potential

impact and resultant effect of the proposed development on the surrounding landscape. The additional views do not repeat views already documented. Not every available view of the Site has been recorded. It is recommended to visit the individual viewpoints in order to experience the full visibility of the proposed development Site within each view.

5.16 The proposed development Site has been highlighted in red for location purposes on the viewpoint photographs. It should be noted that this illustrates the visibility of the ground plain of the view and does not represent the visible three dimensional effect of the development which generally would be greater.

5.17 Viewpoints are presented in an Appendix to this report.

6 Planning Policy

6.1 In relation to this local landscape of high quality natural environment, relevant national and local planning policy should be taken into account in determining this application:

National Planning Policy Framework 2019 (NPPF)

6.2 Chapter 2 - 'Achieving sustainable development', and in particular:

- Paragraph 11 states a presumption in favour of sustainable development, but not at any cost. In respect of planning decision-taking this is: 'unless...any impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

6.3 Chapter 12 - 'Achieving well-designed places', and in particular:

- Paragraph 127 - 'Planning policy and decisions should ensure that developments:
c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).'

6.4 Chapter 14 - 'Meeting the challenge of climate change, flooding and coastal change', and in particular:

- Paragraph 154b) - 'approve the application if its impacts are (or can be) made acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.'
- This area has been specifically identified as being unsuitable for large scale solar projects such as this application and the proposals do not meet the criteria in identifying suitable areas.

6.5 Chapter 15 - 'Conserving and enhancing the natural environment', and in particular:

- Paragraph 170 - 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
a) protecting and enhancing valued landscapes, ;
b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services....'
- In respect of ground conditions and pollution: 'Paragraph 180 - 'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects..... of the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.....' Ground conditions in the location of the proposed development are particularly unsuitable for this type of development.

Planning Practice Guidance (PPG)

6.6 National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), provides specific direction on renewable energy development to provide overriding protection to the environment and sets out how the best Sites should be selected in the section Renewable & Low Carbon Energy:

- Paragraph: 001 Reference ID: 5-001-20140306 states: 'Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.'
- Paragraph: 005 Reference ID: 5-005-20150618 states: '...in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to.'

6.7 The Council's LUC Report correctly identifies the receiving landscape as highly sensitive and highly susceptible to large scale solar development (greater than 30Ha).

- Paragraph: 007 Reference ID: 5-007-20140306 states: In shaping local criteria for inclusion in Local Plans and considering planning applications in the meantime, it is important to be clear that:
 - the need for renewable or low carbon energy does not automatically override environmental protections;
 - proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration;
 - protecting local amenity is an important consideration which should be given proper weight in planning decisions.
- Paragraph: 013 Reference ID: 5-013-20150327 states: 'Particular factors a local planning authority will need to consider include:

- **encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value;** (our emphasis added).
- *‘the proposal’s visual impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety;’*

6.8 The first bullet point is the most essential and important piece of guidance of the PPG noticeably and sadly missing from ES Chapter 6, Paragraph 30 and not followed in the general principle of this planning application. The second bullet point regarding glint and glare and its affect on landscape and neighbouring uses has also not been followed.

North Dorset Local Plan, Adopted 2016 (NDLP),

6.9 Paragraph 2.9 recognises the River Stour Valley as a valued landscape: *‘The valley of the River Stour is also an important landscape feature in North Dorset and the District lies almost entirely within the Stour catchment...’*

6.10 Paragraph 4.60 states: *‘In relation to AONBs, national policy gives the highest status of protection to the landscape and scenic beauty and gives great weight to their conservation indicating that development in such areas should be restricted. **This includes the setting of an AONB.** (our emphasis added) Except in exceptional circumstances, there is a presumption against major development within AONBs unless it can clearly be demonstrated that it is in the public interest for the development to go ahead, having regard to:*

- *the need for the development and the impact on the local economy;*
- *the scope and costs associated with developing elsewhere, outside of an AONB, or meeting the need in an alternative way; and*
- *the impact on the environment, landscape and recreation opportunities within the area and the extent to which these impacts could be mitigated.*

6.11 Policy 4 - *‘The Natural Environment’* and in particular:

‘Developments are expected to respect the natural environment including the designated sites, valued landscapes and other features that make it special. Developments should be shaped by the natural environment so that the benefits it provides are enhanced and not degraded.’

‘Landscape Character

The landscape character of the District will be protected through retention of the features that characterise the area. Where significant impact is likely to arise as a result of a development proposal, developers will be required to clearly demonstrate that the impact on the landscape has been mitigated and that important landscape features have been incorporated in to the development scheme.’

6.12 Policy 22 - *‘Renewable and Low Carbon Energy’* and in particular:

Assessing Benefits against Impacts

When considering proposals for heat or electricity generation from renewable or low carbon sources, the social, economic and environmental benefits of the scheme should be assessed against the likely impacts. A proposal for generating heat or electricity from renewable or low carbon sources (excluding wind energy development) will be permitted provided it can be demonstrated that:

- a) both individually and cumulatively, all adverse impacts arising from the proposal have been satisfactorily assessed; and*
- b) the proposal has maximised the potential to mitigate any adverse impacts that have been identified; and*
- c) the actual benefits that the scheme will deliver outweigh the adverse impacts that remain.*

Impacts

Potential adverse environmental impacts (together with measures to mitigate such impacts) that will be assessed in relation to any proposal include: visual impact; and impacts on biodiversity, the landscape, the historic environment including designated and non-designated heritage assets, the water environment and agricultural land.

In addition, in assessing the adequacy of mitigation measures in relation to a proposal it will be expected that:

- d) the proposal’s location has been identified having regard to sites that make best use of existing transport infrastructure and the minimisation of traffic movements whilst providing safe access; and....*
- f) early meaningful consultation has been undertaken with people in the locality that might be adversely affected by the proposal and clear regard has been had to the responses received;....’*

6.13 Paragraph 6.34: *‘Tourists visiting North Dorset primarily come to enjoy the character of the District’s historic settlements and its attractive countryside. The Council intends to build on this market by:*

- *supporting rural tourism that enables people to enjoy the District’s landscapes and recreational opportunities such as the road-based North Dorset cycleway, the North Dorset Trailway and long distance footpaths.’*

6.14 Whilst encouraging renewable energy sources, it is very evident that overriding planning policy both nationally and locally is to protect the natural environment from damage due to inappropriate development and particularly to landscapes of value such as the Blackmore Vale.

7 Development Proposals Review

Scale

Figure 6 - BSR Example Sites



Bradenstoke



Owl's Hatch



Shotwick



Swindon

7.1 This is a large scale, industrial sized development proposal which would be imposed on an overtly rural landscape of large landform but small scale land use. The Council's LUC Report on landscape sensitivity to solar developments of over 30Ha assesses the susceptibility of the largest potential development sites. This proposed development is over two and a half times that size. The Site area of 77Ha is the approximate size of 110no. average sized football fields or equivalent to the entire developable area of the new Poundbury development attached to Dorchester. This is simply an overbearing scale and unsuitable for the rural, tranquil receiving landscape.

Site Selection

7.2 Renewable energy may address the challenges of climate change, but it should not do this at any cost. It is

rather ironic, counterproductive and environmentally unfriendly if the renewable energy we install damages in some way the identified good parts of the natural environment we are actually trying to save. National and local planning policy directs that appropriate site selection is made particularly for large scale solar farms prior to a planning application specifically so that the most suitable sites are chosen in protection the environment.

7.3 ES Chapter 1 gives four examples of large scale BSR completed projects. The sites are illustrated at Figure 6, Page 10. A brief desktop analysis on Google Earth suggests they follow the directives as set out in NPPF, Planning Practice Guidance. All are on broadly flat, brownfield sites and in close proximity to significant, existing built infrastructure:

- Bradenstoke, Wiltshire - located at RAF Lyneham on a flat site within existing airfield infrastructure.
- Owl's Hatch, Herne Bay - located close to major transport infrastructure on a mainly flat site.
- Shotwick, Flintshire - located on a flat site adjacent to major industrial and transport infrastructure.
- Swindon, Wiltshire - located at RAF Wroughton on a flat site within existing airfield infrastructure.

7.4 ES Chapter 3 describes Site selection process as being guided by development control, but this is clearly not the case. The selection criteria recognises the reuse of brownfield sites for large scale solar farms is a planning policy requirement and states: 'Previously developed land: Consideration of this criterion involved reviewing whether suitable areas were available to accommodate the scale of the Proposed Development. None were identified.' The conclusion from this would be that there are no suitable sites for this type of development. This is not a strong reason for choosing a Site such as North Dairy Farm, which is by definition not suitable. It is not clear where or to what extent this search for a suitable site has been carried out. However, Site selection procedures within the design process of the development proposals beyond this point seem to concentrate merely on selecting different parts of North Dairy Farm's land.

Visual Detractors

7.5 ES Chapter 6 highlights several 'detracting features' (pylons, substation, small solar arrays, post and wire fencing and concrete farm track) on or near the Site attempting to present the surrounding area as a utilitarian and possibly degraded landscape. Oddly the development proposals add to these in significant magnitude.

7.6 However, in the quantity that they exist, none of these (except possibly the existing line of pylons) are detractors within the scale of the surrounding landscape, nor do they affect the overall quality of the landscape setting.

7.7 ES Paragraph 107 referring to Site specific character states: '...the addition of elements that degrade the quality of the landscape character that includes post and wire fencing...' (this existing fencing is generally approximately 1m high and a common occurrence in the agricultural landscape) and yet the development proposals include a proposal for adding 10.2kms of 2.2m high post and wire deer fencing - over double the height of the existing, lots more of it and with the addition of over 200no. (at the stated 50m centres) 6m high

posts topped with security cameras.

7.8 Considering local landscape character, ES Paragraph 112 mentions *'there is a utilitarian element to the existing landscape'* identifying an existing electricity sub-station 2.77kms north west of the Site. However, this is approximately one third of the area size of the new sub-station to be included on the Site as part of the development proposals. The same Paragraph oddly also identifies two 0.5Ha existing nearby solar arrays in Hazelbury Bryan and Kingston. On this basis, 68Ha of solar panels would in this case be a considerable utilitarian element to add into the existing landscape.

7.9 ES Paragraph 129 highlights the existing concrete track as a detracting feature and yet this is retained and enhanced (3.5-6.0m wide as stated ES Chapter 3) as a critical part of the access to the development proposals. Approximately 4.0kms of additional tracks are proposed on the Site. The same Paragraph mentions the high-voltage pylons crossing the Site as a detractor and yet the development proposal includes an additional 15m x 10m high new connection pylon. There is a submitted construction detail for a concrete based track but it is unclear where this is proposed on the Site.

Duration

7.10 It is planned for the development proposals to remain in place for a period of 35 years, then be removed and the land returned to agriculture. Even though this is planned at this stage to be reversible, it is a long term development with a degree of permanency being in place for the equivalent of approximately half a lifetime. It is hard to imagine that the land will ever return to agriculture and there is nothing to stop further applications once the Site use is established and familiar.

Mitigation

7.11 Planned 'further mitigation' is set out in ES Chapter 3 and on the Landscape and Ecological Enhancement Plan at ES Appendix 3 (and Appendix 6.4?). This will require time to establish and, by year 15, this would be practically half the lifetime of the development proposals.

7.12 The proposed mitigation does not provide any meaningful screening or protection of any of the identified views from publicly accessible land as confirmed by the submitted photomontage images - ES Appendix 6.5 1 of 4. The landscape and ecological enhancement plan shows existing hedgerows to be maintained at 2.5 to 3.0m high once established. This will provide no visual mitigation from viewpoints where the panels are 2.6m high in themselves, and less so when located on rising ground, or when viewed from higher ground.

7.13 In ecological terms, the mitigation proposals are inadequate in relation to the scale of the proposals and non-existent in terms of any visual and character protection of the surrounding landscape. 1,646m of new mitigation hedgerow is proposed, but this doesn't even come near replacing the 2,415m of hedgerow and

6,767m² of woodland lost within the Site since 1947. ES Chapter 6, Paragraph 60 states that the historic field pattern would be restored, however, the mitigation proposals do not match the historic field pattern. Nor does it compare very favourably in proportion to the 10,200m (10.2kms) of proposed fencing or 4,000m of additional tracks let alone 550,000m² of solar panels. This extent of mitigation planting and provision of natural field margins are no more than the sort of good land husbandry expected of responsible landowner (particularly with farming subsidies for biodiversity gain) looking after the condition of his land and not of a level to accompany and mitigate a proposed major, industrial scale development.

7.14 It is understood that rows of heavy standard tree planting is a response to identified potential harm from glint and glare to existing residential properties. However, this planting of larger tree stock planting will require more intensive maintenance to ensure establishment and survival. Enforcement of a detailed planting management specification would be a prerequisite to ensuring that this is achieved.

7.15 Public footpath N46/20 which passes through the Site is not marked on the submitted LEEP. There would be substantial changes to visibility and character from this footpath where development proposals would be oppressive and yet there is no meaningful mitigation proposed - just some wildflower field margins and an information board. The existing footpath has also been diverted from the legally defined route.

Glint and Glare

7.16 ES Chapter 6, Paragraph 170 states: *'A Glint and Glare Impact Assessment has been undertaken to inform appropriate mitigation measures.'* Despite PPG, [Paragraph: 013 Reference ID: 5-013-20150327](#) as above which requires an assessment of *'the proposal's visual impact, the effect on landscape....and neighbouring uses'*, the submitted Solar Photovoltaic Glint and Glare Study considers only the possible impact on road users and dwellings and within a 1km range of the Site. Some mitigation screening is provided for the latter. The Study has not considered the potential effects of glint and glare on any other publicly accessible land in the setting of the Site including any potential adverse effects on the Dorset AONB. This is of particular concern considering the ground elevation at the escarpment within the AONB and the relationship with the solar panels. No explanation has been provided as to why this essential piece of information has been omitted from the submitted Study.

Residential Properties

7.17 There are a number of properties which have been identified as having views of the proposed development. One in particular is especially affected. Boywood Farm is located approximately 85m from the eastern Site boundary. ES Chapter 6, Paragraph 147 states: Boywood Farm: *'There are filtered views into a very small area of the Site directly opposite the farmhouse where post and wire fence marks the boundaries'*. This is incorrect. There are direct and open views onto the Site from the farmhouse over an existing low trimmed hedge. The *'very small area of the Site'* referred to is a 6.85Ha (68,531m²) field of solar panels on rising

ground and where the panels will break the skyline in part of the view. Glare from the proposed solar panels is also identified in the submitted Solar Photovoltaic Glint and Glare Study. Despite the proposed mitigation planting at the boundary which would take some years to become effective, this would have a significant impact on this property and the development proposals would be unacceptably overbearing to this property.

8 Landscape and Visual Effects

Landscape Effects

- 8.1 When evaluating landscape effects in relation to EIA regulations, GLVIA Paragraph 5.35 recognises it is the combined effects on overall character of changes in and/or loss of physical features, aesthetics and perceptual aspects or the addition of features which influence character and distinctiveness of the landscape.
- 8.2 In evaluating landscape effects of the development, ES Chapter 6 relies heavily on assessing physical changes and visibility exposure. Whilst generally underestimating these, it overlooks the distinctive perceptual qualities which are particularly strong in the local landscape and the substantial harm the development proposals would have on these. The industrial scale and nature of the proposals is highly discordant with the relatively unchanged, overtly rural landscape and the perceptual qualities of a tranquil, small scale, lush, and green landscape. The dairy farming, pastoral landscape, which is the predominant characteristic of the surrounding landscape, and the cultural associations, notably to Thomas Hardy and William Barnes would also be substantially harmed.
- 8.3 The landscape setting has a high susceptibility to change and adverse effect in relation to large scale (over 30Ha) solar developments. The scale of the proposed development on this landscape is of significant effect in itself. Section 4 above sets out that this is a valued landscape. The combination of high susceptibility and landscape value confirms the high sensitivity of the landscape setting. The proposed development would be in place for 35 years, which means that this is a long term development. Although some of the proposed development having a light footprint can be reversible, but some of it, like the substation, is not so easily removable. Although the stated intention is to return the land to agriculture, it is difficult to imagine that would be the case having been established for 35 years as an energy generating site. The combination of assessments leads to significant harm to the landscape resource.

Visual Effects

- 8.4 Whilst the proposed development Site may be only partially visible in some views, because of its overall large scale, these are often significant areas of visibility overall causing substantial harm. This is exacerbated by the nature of the geometric, monotone features of the development proposals which visually combine to become a large scale single element imposed on a gently undulating landscape of large format landscape landform

(i.e. longer distance views from higher ground and from the escarpment in the AONB over the Vale) and small scale land use (i.e. the intricate landscape pattern of the Vale).

- 8.5 The ES Chapter 6 underestimates visibility of the development Site in the surrounding landscape. There are substantial views close to and within the Site, and views from locations in the local landscape including the Hazelbury Bryan conservation area. Longer distance views from elevated ground on the escarpment and within the Dorset AONB are also significant. These are well known and iconic views from where the Vale is the very focus of the view. The large area of the proposed development Site lies centrally within many of the available views and to where the viewers' eye is naturally drawn. In addition, glint and glare which has not been considered in the submitted information from here and other publicly accessible land (other than local roads) is of particular concern.

9 Summary Conclusions

- 9.1 The area around the Site is distinctively rural and the landscape is of a high visual quality and intrinsic beauty. The landscape characteristics of the Blackmore Vale combine to create the intimate character of a pastoral and tranquil landscape. This is a valued landscape and a landscape of high sensitivity as set out in Section 4 above. The proposed large scale, industrial and long term development would severely and adversely detract from the character and the perceptual qualities of this special landscape and the setting of the Dorset AONB.
- 9.2 This appraisal of the landscape and visual impact and potential effects of the development proposals demonstrates that the submitted documents do not correctly evaluate the potential harm to this sensitive and valued landscape. Proposed mitigation is not adequate and cannot assimilate the proposed development.
- 9.3 The provisions of national and local planning policy have not been met. As such, there would be demonstrable and significant harm created by these development proposals to the character, tranquillity and special qualities of this valued landscape.
- 9.4 The balance required to be made between the benefits of the proposed development and the demonstrable serious harm that it would inflict on the character and qualities of this valued landscape, in particular the setting of the Dorset AONB, weigh decisively in favour of refusal of the Application.

