



**'SAVE HARDY'S VALE' COMMUNITY GROUP. PROPOSED SOLAR GENERATING ARRAYS
ON LAND AT NORTH DAIRY FARM, PULHAM DT2 7EA**

Case Officer: Rob McDonald
Dorset Council
South Walks House
South Walks Road
Dorchester
Dorset
DT1 1UZ

10th October 2022

Dear Rob,

Full Planning Application [P/FUL/2021/01018](#)

Our Interest

'Save Hardy's Vale' (SHV) is an unincorporated community association. It was formed to protect productive agricultural land in a highly sensitive and valued landscape at the heart of the Blackmore Vale, from the significant harm that would result from granting approval for the Application.

The development proposed is for the installation of metal mounted Bifacial solar arrays, substation, inverter and transformer units, security fencing, gates and CCTV, and the formation of vehicular access and ancillary infrastructure, on a site of 190 acres (77 hectares).

This representation addresses some of the changes made to the North Dairy Farm Application in the updates of July- September 2022. It also raises questions about the latest amendments.

1. We note that the significant amendments include:

- Removal of panels from the eastern boundary of field 4, to be replaced by a 20m wide area of screen planting
- Removal of panels to the north of the power line in field 7
- 17.5 m wide screen planting in field 6, to provide screening to the substation in views from the north and west
- 20m wide screen planting on the north west boundary of field 7, to provide screening of the substation views from the east and south.

Secondary mitigation

2. The Applicant notes that the screen planting would consist of: “Feathered tree stock and native shrubs to be planted on a 1.5m triangular grid, in species groups of three to seven. Tree species to be planted at spacings no greater than 3m. Thinned at 5 years with large broadleaved species on a 4.5 to 6m grid and smaller broadleaved tree species on a 3 to 4.5m grid.” And that: “new feathered trees (mixed sizes to create a more naturalised character and age structure 8-10 (2.5 m high) 10-12 (3 -3.5m high) 12-14 (3.5 – 4.25m high)”.

3. We believe It is unlikely that these areas of ‘screening’, which are a mixture of trees and shrubs, would exceed 5m in height after 15 years and therefore they would provide little or no mitigation to the harm caused to views from the AONB escarpment, particularly the areas around Woolland hill carpark which is a popular destination or pausing point for walkers, cyclists and horse riders as well as those who wish to just sit in their car and enjoy the distant views over the proposed Site, to the north and north west towards the Mendip hills.

Uninterrupted panoramic views

4. We disagree with paragraph 285 of the tracked changes in which the Applicant states: “We believe there will be a reduction in the sense of tranquillity and remoteness experienced in a few small areas, of the AONB south-east of the site in the vicinity of Stoke Wake, Bulbarrow Hill and Woolland Hill arising from occasional or intermittent views towards the proposed development.” The reduction would neither “be slight” nor perceived only from a “few small areas” and the views from Woolland Hill carpark (for instance) are clear and obvious, not “occasional or intermittent”.

5. The applicant goes on to say: “the horizontal emphasis of the solar array and the proposed development’s low-lying location within the Blackmore Vale (relative to the elevated landscape of the AONB’s chalk escarpments) means that the proposed development will not interrupt the panoramic views seen northwards across the Blackmore Vale from the AONB”. We dispute this statement on the grounds that planted screening would have very little impact on the views from high ground, even after 15/20 years and it is our opinion that the solar array, substation and new pylon plus 33 transformer stations in green containers, would be very visible in panoramic views from the AONB and the high landscape areas surrounding the proposed site. We believe we are supported in this opinion by the AONB Landscape Planning Officer, the Council’s Landscape Architect and Philip Hanson CLMI, of The Landscape Practice.

6. We note the changes to the increased height of the CCTV cameras from 2.5/3 metres to 4.5 metres, plus camera. These would exceed the height of most of the proposed planting into the long term (15-35 years).

7. It is laudable that the applicant has made efforts to reduce visibility from local viewpoints by planning screening belts. Unfortunately, this would make little or no difference to the perception of an industrial intrusive development for at least the first 15 years and would have minimal impact on mitigating the identified harm to long distance views from the AONB into the Site, even in the long term, when the planting has fully matured.

AONB Special Qualities

8. Dorset’s AONB Landscape Planning Officer notes¹ that the area “has a suite of Special Qualities that make it a unique and outstanding place, underpinning its designation as a nationally important landscape”. He points out that: “These are the Special Qualities we need to conserve and enhance for the future, and they should be considered in decisions affecting the AONB”.

9. The AONB Officer also notes at Paragraph 3.2.2: “the proposed development is of quasi-industrial appearance and the aesthetic character of the proposal results in contrast with the underlying ‘natural’ character of the site and its wider landscape setting. He points out that: **“the large scale of this proposal, in combination with its relatively close proximity to**

¹ Richard Brown CMLI, Dorset AONB Landscape Planning Officer, 3.2 AONB Special Qualities Paragraph 3.2.1

the AONB, result in foreseeable alterations to the character and appearance of the AONB”.

10. At paragraph 3.2.3 the Officer notes: **“Overall, I consider that the development proposals could foreseeably adversely affect some of the special qualities that underpin the designation, particularly:**

- **‘Uninterrupted panoramic views to appreciate the complex pattern and textures of the surrounding landscapes’**
- **‘Striking sequences of beautiful countryside that are unique in Britain’**
- **‘Tranquillity and remoteness’**
- **‘Undeveloped rural character’**

Following the latest amendments to the Application, we believe this assessment remains unaltered.

11. At Paragraph 4.14 the Officer highlights that the resolution of the images (particularly the reduced size versions that are uploaded to the website) is often lower than can be achieved by the human eye in the field. **“Casual viewers of the lower resolution versions risk underestimating the degree to which a proposal can be perceived in the field.”**

12. The Officer notes at paragraph 5.3: **“The LVIA makes reference to an iterative process of design review and mitigation. While recognising that there has been some modification to the design of the application since its inception, the fundamental issues of development scale, siting and layout have not substantially altered. These are important primary forms of mitigation.”** We believe this matter has not been significantly addressed in the latest Application amendments.

13. The AONB Officer notes, in section 4.12 of his consultation response, that the: **“LVIA identifies factors that increase the potential impact of the development on the AONB, including the open and southern sloping nature of some areas”**. In his opinion the: **“iterative design process should have sought to remove and reduce development in some of these areas, as well as recommending more substantial secondary mitigation (such as planting), to address those residual adverse impacts that remained. The mitigation measures contained within the assessment that extend to primary issues of design are quite limited and tend to only result in minor alterations to the impact of the development, for example marginal reductions to the extent of the arrays and associated security fence alignments”**.

We note that the opportunity to reduce the total panelled area of the proposed development, in line with the AONB Officer's primary mitigation suggestion, which is offered by the switch to more efficient Bifacial PV panels,² has not been taken up by the Applicant, for example, by excluding panels in areas such as fields 10 & 13.

14. The Officer also emphasised: **“Furthermore, some features listed as mitigation, such as the swales, do little to address visual impacts due to their position in marginal locations. Whereas the LVIA assumes the ‘longer-term’, at which point effects are considered to become reduced, would be from 15 years following completion of the development, it is foreseeable that some of the planted mitigation would not achieve substantial screening effects until beyond this point. This suggests to me that a number of effects of potential significance would continue to result in residual effects that are of relevance, even in the longer-term”**.

Intrusive mitigation

15. We brought to your attention in a previous SHV representation³ that: “Though all Applications have to be considered on their own merits, the ‘Tithe Barn Lane’ Appeal Decision is very pertinent to the NDF proposals.⁴ The Inspector notes: “Significant mitigation measures are proposed.” And that “additional planting could effectively screen the development but would itself be visually intrusive by undermining open views across the site. Furthermore, vegetation, even if standard plants are used, would take some years to become effective. In the interim there would be clear views from the footpaths and roads of the many rows of solar panels, which would be no lower than 2.6 metres in height and which would block all views across the site. Their industrial appearance would be alien in this countryside location and the solar panels, in views from footpaths and roads around the site, would have a significant adverse effect on the visual amenity of the area.” The same can be said for the NDF proposed site.

Design and Access Statement

16. It is suggested in the Design and Access Statement (Document R004) that there would be security and monitoring CCTV/infra-red cameras mounted on “fence posts 3m – 4.5m tall **along the perimeter of the Site**”. The Planning Layout (Drawing 1641-0201-01) shows the 4.5-metre-high CCTV posts positioned to surround **each field** containing PV panels. Clearly, and despite the proposed mitigation planting, the posts would continue to have a

² Document R009 - the Landscape & Ecological Management Plan- Page 9 Paragraph 22.

³ [shv-rob-mcdonald-chapter-6-consultation-representation-1133022.pdf \(wordpress.com\)](#)

⁴ Appeal Ref: [APP/D2320/A/14/2222025](#) Paragraphs 9, 10 11 and 12 and others.

detrimental visual impact on the surrounding landscape well into the long term of the development (15 to 35 years).

17. It is stated at Paragraph 92. That the solar panels are to be mounted on a frame made of galvanized steel or aluminium. As Bifacial panels do not have frames is this statement accurate?

18. We note that Figure 3 of the Proposed Site Plan (and others) has not been updated to show the latest changes to layout.

19. We question whether the support design shown in Figure 4: Solar PV Panel Elevation, is a suitable support for use with Bifacial panels?

20. 4.2.7 Materials and Appearance. Details of the materials and appearance of the proposed solar arrays and associated infrastructure are provided on the application drawings contained in Document Ref: R002. We have been unable to locate the document on the Planning Register.

Private benefit

21. The Applicant notes (Paragraph 70.) "Farming businesses play a vital role in the rural economy, particularly supporting the agricultural supply chain to include feed merchants, machinery sales, maintenance and repair businesses, local builders, delivery drivers and professional services, to name but a few." The Applicant suggests: "The solar array project will help to **support the local agricultural supply chain**". Presumably they are referring to the 'private' income to the farming business generated by the proposed development. Those in the wider "rural economy" listed by the Applicant, would not, in our opinion, be supported by the proposed development in the way, or extent, suggested by the Applicant.

22. The Applicant also claims (6.2 Social Context Paragraph 72.) "The Proposed Development will have no direct adverse social impacts on individual members of the local community or those in the wider area of the Parish and neighbouring town by virtue of noise pollution or **other potentially adverse effects on the environment**. This ignores the harms to the environment identified by the Applicant in the LIVA and in the representations and letters of objection sent to the Local Authority.

23. The Applicant notes: (at paragraph 74.) “The National Farmers' Union (NFU) announced plans to make British agriculture carbon neutral within two decades”. We point out that the NFU is aware of growing concern about the large scale of some recent ground-mounted solar installations being constructed on farmland. They are also working with the solar industry to; “ensure that good practice guidance is applied to this next wave of solar farm construction, enabling truly multipurpose land use”. The use of agricultural land for “occasional sheep grazing” in the way the Applicant proposes, does not enable productive and “truly multipurpose land use”.

24. The Applicant claims (Paragraph 80.) that: “It is considered that the scheme layout, design and location would not have an unacceptable adverse effect on the local environment or the visual or amenity value of the local environment nor the wider area.” We believe that this conclusion is unsupported by evidence presented in the LIVA, or by the expert opinions presented by the AONB Landscape Planning Officer, The Council’s Landscape Architect and Philip Hanson of ‘The Landscape Practice’.

25. At Paragraph 82 the Applicant suggests that: “the use of land in the countryside to produce energy is consistent with tradition and practice going back to when woodland was planted and managed to generate wood for fuel”. We believe that attempting to equate managed woodland to 77 ha of industrial infrastructure, which would be alien to the suite of “Special Qualities that make it a unique and outstanding place”, is unrealistic.

26. The Applicant claims (at Paragraph 89.) that the: “overall extent of ground disturbance on Site would be minimal being approximately 4% of the overall site area as a result of the underground cabling, internal access roads, inverter/transformer stations, panel frames and proposed on-site substation.” This claim attempts to minimise the impact on the ground during the construction phase. We believe the images presented in the SHV representation showing⁵ other BSR Sites after construction, clearly demonstrate that the ground disturbance extends over most of the areas covered by the PV panels (estimated in the NDF site to be 55 acres).

⁵ [shv-5.-flooding-run-off-ijb-31-5-2021.pdf \(wordpress.com\)](#)

Battery Energy Storage Systems

27. The proposal to install on site Battery storage was removed from the planning Application. It is now indicated (at Paragraph 96 of the Design and Access Statement) that Battery Energy Storage Systems may be installed in the future. If this is so, we believe that this important (and controversial) matter should be included within the existing Application so that the entirety of the development proposals can be considered by the Authority.

Cumulative assessment

28. In 2020, when the Applicants requested an EIA Screening Option, it was accepted by the Authority that there were: “no other large scale solar developments in the area which required consideration of cumulative impact.”⁶ Clearly It is at the discretion of the Council as to whether the cumulative impact assessment should also consider proposals which are currently under consideration, pending a decision or appeal or subject to an EIA screening request.

29. We believe that the number of developments that have taken place, or been approved, has significantly increased since 2019/20, and that a Cumulative Impact Assessment, of the potentially significant effects of the proposal in combination with other developments should be undertaken. We note that cumulative effect is not dependant on direct intervisibility between sites.

30. We also note that cumulative effects are not only experienced between developments of the same type, i.e., multiple solar farms, they can also be experienced in combination with other development in the surrounding landscape. We understand that the scale of the cumulative assessment study area would be dependent on the size of the proposed solar farm and the number and scale of other developments in the area.

⁶ 2/2020/1268/SCREIA Proposal: Request for EIA Screening Opinion to Rachael Ness 22/9/2020 [dcc-eia-screening-opinion.pdf \(wordpress.com\)](https://www.westmorland.gov.uk/media/2020/09/dcc-eia-screening-opinion.pdf)

31. For the reasons outlined here, and those noted in the attached and previous SHV representations,⁷ we ask that the Application, as presented, is refused grant of approval.

Ian Bryan⁸

For and on behalf of the Save Hardy's Vale community group

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[SHV Facebook](#)

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2022

⁷ [SHV Letters of Representation – Save Hardy's Vale \(savehardysvale.com\)](#)

⁸ In collaboration with Peter Moise, Catherine Langham and David Horrell