



Position Statement: Solar Photovoltaic (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 Mendip Hills Area of Outstanding Natural Beauty (AONB). Applications for solar PV development within the Mendip 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 Mendip Hills AONB Partnership 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. The Mendip Hills AONB Partnership has, therefore, a presumption against commercial large scale solar PV arrays within the protected landscape and for proposals outside its boundary, where views out from or towards the AONB might be affected, a rigorous assessment should be undertaken.

However, there are other, smaller-scale opportunities for solar PV within AONBs such as the small solar array at Fernhill Farm and rooftop array at Priddy Village Hall both part funded by the AONB Sustainable Development Fund. This position statement is concerned with the AONB Partnership's position with regard to commercial developments.

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 Government's Feed in Tariff (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 on the fringes of the AONB, particularly when the tariff was at its highest.

Policy Context

National

When considering applications for solar PV development, the National Planning Policy Framework (NPPF) will need to be carefully considered.

The Framework has policies relating to meeting the challenge of climate change, flooding and coastal change in section 10:

'Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.'

The NPPF indicates in paragraph 97, 'To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise

the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. Amongst the criteria the following is particularly relevant in terms of proposals in or near the Mendip Hills AONB. Local authorities should:

- design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources.

Paragraphs 115 & 116 of the NPPF emphasise the strong protection given to AONBs:

115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas’.

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Local Planning Policy

The four local planning authorities covering the AONB in terms of development management have policies dedicated to conserving and enhancing the Mendip Hills AONB.

Policy D14 of the Sedgemoor Core Strategy is a typical example which reflects the duty placed on public bodies as set out in the Countryside & Rights of Way Act 2000 (CRoW).

“Development proposals within the Mendip Hills AONB or the Quantock Hills

AONB will only be supported where they enhance or conserve the natural beauty, or the exceptional character or quality of the landscape in these areas.'

The statutory Mendip Hills AONB Management (2009-2014)

'Development and Transport' section, sets out Objectives and Action Points including criteria for any proposed new development to ensure conservation and enhancement of the landscape.

Solar PV Arrays and the Mendip Hills

The AONB Partnership 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 plateau landform of the Mendip Hills makes it is an exposed and highly visible landscape. It rises high above the flat wetlands of the Somerset

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.

Levels with steep craggy slopes, a distinctive south-facing escarpment and a gently undulating plateau. The limestone ridge is one of England's most attractive landscapes with the windswept plateau punctuated by spectacular dry valleys and gorges, ancient sinkholes and depressions, and impressive rocky outcrops. On the hilltops there are hundreds of ancient monuments, while on the steeper slopes flower rich grasslands and wooded combs offer varied habitats for a wide diversity of wildlife.

In contrast to the open farm and heath land on the hill top criss-crossed with dry stone walls, the Lox Yeo and Chew Valleys provide an impressive setting for the hills. Chew and Blagdon lakes are set within a rich farmed landscape with fields divided by hedges.

The diverse landscape character of the Mendip Hills and its setting does not naturally lend itself to accommodating the geometric forms that typify solar PV developments. On the plateau where long distance views across an open landscape criss-crossed by natural dry stone walls and containing ancient archaeological features, the visual intrusion of large areas of solar PV arrays and associated infrastructure would be most unwelcome in terms of landscape character. Likewise expansive arrays of panels set against the craggy southern slopes or when seen from higher ground looking down into the lush farmed Lox Yeo and Chew valleys and across the Levels and Moors are likely to be highly intrusive.

It is as much for the views offered within the AONB as the views out from the Mendip Hills that the area is valued. These views offer 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 Levels and Moors and over to the Quantock Hills AONB and far-reaching, changing seasonal views across the Severn Estuary to Wales. The quality of the views afforded by these landscapes has a direct impact on enjoyment of the Mendip Hills and their influence on peoples' perception of 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 Mendip 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 Mendip Hills AONB Planning Liaison Officer if a screening request is made by a land owner/developer. The AONB Unit 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 Partnership 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

National Policy

National Planning Policy Framework
National Policy Statement for Energy Infrastructure

Local Planning Policy

Protection of AONBs

Bath & North East Somerset Local Plan *Policy NE.2*

[Bath & North East Somerset Core Strategy*](#) *Policy CP6*

[Mendip Core Strategy*](#) *Development Policy 1*

North Somerset Core Strategy *Policy CS5*

North Somerset Replacement Local Plan *Policy ECH/8*

Sedgemoor Core Strategy *Policy D14*

Renewable Energy

Bath & North East Somerset Local Plan *Policy ES.1*

[Bath & North East Somerset Core Strategy*](#) *Policy CP3*

[Mendip Core Strategy*](#) *Development Policy 2*

North Somerset Core Strategy *Policy CS1*

Sedgemoor Core Strategy *Policies S4 & D4*

** These are currently draft LDF documents pending formal adoption.*

AONB Management

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

Other

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

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 Mendip Hills AONB Unit 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 having part of the AONB within their boundaries.