

RODE PARISH COUNCIL – FURTHER RESPONSE TO THE PROPOSED SOLAR FARM AT RODE

Planning Application 2023/2183/FUL

Dear Sir/Madam,

Rode Parish Council (RPC) is strongly in favour of sustainable energy, and formally declared a Climate Emergency in 2021. However, in line with the views of many local residents, the council believes this proposed development is flawed in multiple ways – in particular, the scale of the proposed solar farm (**which would be the largest in Somerset, and one of the largest in the UK**), its proximity to the historic village of Rode, and its impact on the local countryside and a number of heritage assets.

The changes made to the scheme since the original consultation period are very minor in nature and do not materially address any of the concerns or issues raised by Rode Parish Council or many other respondents.

Since the initial consultation period, the applicant has provided a number of further documents. RPC wishes to respond to some of these, and also to provide some additional comments. This further response should be read in conjunction with RPC's initial comments on the application, dated 16th December 2023.

RPC remains unanimously opposed to the application, primarily for reasons of scale, its proximity to the historic village of Rode, and its impact on the local countryside. In addition the Council has significant concerns about one of the access routes.

Much care needs to be taken to appropriately site any solar farm, given their visual impact....that care must be maximised when developments of this scale are contemplated, even more importantly when the location is adjacent to, and completely dwarfs, a small historic village.

RPC's additional comments are set out in summary form in Section A on the next page, and then in more detail in Section B.

Section A – Summary of additional comments

1. **“Strongly negative” categorisation of near and adjacent sites.** A recent exercise carried out by Somerset Council concluded that nearby and adjacent sites in Rode were unsuitable for development, for a number of reasons – most importantly due to the strong negatives and the difficulty of mitigation in relation to landscape, settlement character and distinctiveness.

2. **Proximity to the village of Rode.** The proposed changes to the scheme continue to ignore the importance of the setting of the village and completely misunderstand the unique nature of Rode, its history and its beauty.

3. **The development would be contrary to a number of important planning policies and guidance** and should not be allowed to proceed.

4. **Extremely limited site selection exercise.** The site selection process undertaken by the applicant was extremely limited, ignoring 99.5% of the county, and indeed failing to look beyond a very small corridor of land between Melksham and Frome. With such a limited exercise it is impossible to draw any conclusions regarding the relative suitability of the site.

5. **The development would negatively impact a number of Heritage assets** and the additional mitigation measures proposed by the applicant do not sufficiently address the harm caused by the development.

6. **The applicant’s “Statement of Need” (SoN) ignores clear guidance in the PPG* and implies an urgency and importance to this particular proposal which does not exist.** In particular, the SoN seeks to claim that all of Somerset’s energy requirements must be delivered by low-carbon energy generated from within the county. However, the PPG is very clear that “whilst local authorities should design their policies to maximise renewable and low carbon energy development, **there is no quota which the Local Plan has to deliver.**”

7. **Poor access.** We acknowledge the comments made by Somerset Highways in relation to the concerns of Monkley Lane residents. However, RPC believes Monkley Lane is highly unsuitable for the traffic that will be generated during the construction phase, and also highly unsuitable for emergency vehicle access.

8. **Land use and classification.** The applicant has submitted a Land Classification study which indicates that the majority of the land is classified at 3b. However, 2.7 ha (6.7 acres) is grade 3a [Best and Most Versatile], and – despite its classification – parts of the 3b classified land support excellent crop growth.

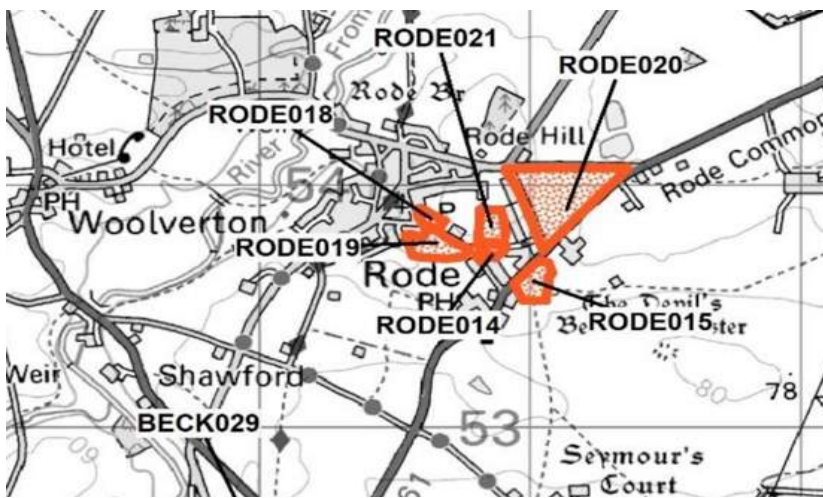
9. **Cumulative Impacts.** There are 6 (soon to be 7) solar farms within 5km of Rode, and the cumulative impact of these developments needs to be taken into account.

*PPG: The UK government’s planning practice guidance on Renewable and low carbon energy

Section B – Detailed analysis

1. “Strongly negative” categorisation of near and adjacent sites

As part of the requirement to update the Mendip Local Plan pt 2, Somerset Council has recently concluded an exercise to identify sites for approx. 500 houses in the former Mendip District Council area. This exercise involved a detailed examination of the suitability of six sites in Rode (see below), including one site (RODE020) which is adjacent to land proposed for the solar farm:

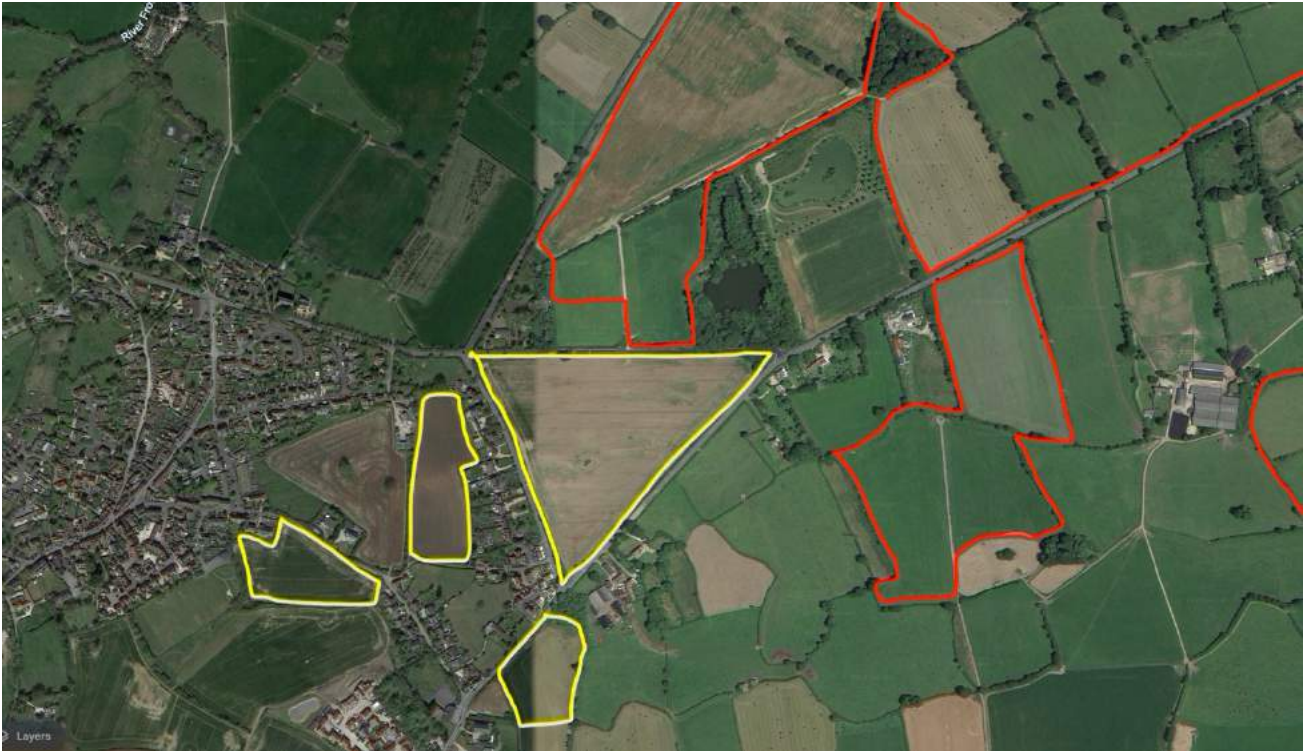


The examination carried out by Somerset Council concluded that none of the sites in Rode was suitable for development, for a number of reasons – most importantly due to the strong negatives and the difficulty of mitigation in relation to **landscape, settlement character and distinctiveness**.

In relation to the site adjacent to the proposed solar farm (RODE020), under criteria SA03 (“protect and enhance the district landscapes”) the assessment stated: “The site is within Landscape Character Area B3, the Lower Frome valley. It is defined by the river valley which is steep sided, opening out into a plateau landscape to the east of the river. It is defined as lower quality landscape and is influenced by disturbance created by the main roads. This site is elevated and extremely prominent. **Development would extend the built-up area into open countryside presenting an incongruous block of development. Development would cause harm to landscape character.**” And concluded that the “**harm to landscape character would be difficult to mitigate**”.

Under criteria SA08 (“promote local distinctiveness, protect heritage, and enhance townscape”) the assessment found that “Development on this site would have a **significant impact upon the historic pattern of the village's built environment and its character**. This site

is an open area of agricultural character which is an important feature of the village's setting."



Above: Google Earth image of Rode, marked to show the four largest proposed housing sites (marked in yellow) and the areas proposed for the installation of solar panels (marked in red). All the sites in yellow have been scored "strongly negative" on landscape/settlement character/distinctiveness criteria.

All the six sites in Rode proposed for development scored "**strongly negative**" on the three criteria which relate to landscape, character and heritage. Obviously those sites are closer to the centre of the village than the proposed location of the solar farm – although the largest (RODE020) is just a few metres away from the edge of the solar farm. It would therefore seem illogical that Somerset Council could conclude that the sites bounded in yellow are so damaging, but could then (potentially) approve the construction of unsightly solar panels on land in such close proximity (bounded in red). Possibly even more so, given that housing can at least make use of sympathetic building materials, whilst there is no way of "blending in" acres of grey steel structures.

2. Proximity to the village of Rode

As noted elsewhere, the solar farm extends to just 200m from the village. Some respondents to the initial application suggested that the impact of the proposed development on the village setting could be reduced by removing panels from Areas 1 and 2 (those parts of the development closest to the village itself). The applicant responded to these concerns as follows: "Removal of the western extent of Site Area 1 and reinstatement of the historic hedges here would have very limited, if any, effect on the visual perception of encroachment

on the village of Rode due to the negligible intervisibility between this area, and indeed, the site as a whole, and the village.”

RPC would strongly dispute this statement, and the results of the recent exercise undertaken by Somerset Council [SC] (referred to in the previous section) logically support RPC’s view [SC has determined that development on land adjacent to Site Area 1 “would have a significant impact upon the historic pattern of the village's built environment and its character”]

In addition, the response from the applicant has sought to address only one aspect of “setting” – whilst visibility from approach roads is important, the concept of setting is far more fundamental.

Unfortunately the applicant has failed to understand the very special and historic nature of the village. Rode has evolved from a river crossing point for a Neolithic trackway, through Saxon settlement, Norman overlords, expansion during the centuries of trade in the woollen industry to the astonishing number of shops and pubs of yesteryear, to its present day beautiful and thriving community.

Rode has a rich and fascinating history which is meticulously recorded in several books on the village, and also set out in some detail on the Rode village website: <https://www.rodevillage.com/history-of-rode/>

40% of the village is covered by Conservation Area, within which there are over 75 listed buildings (including a Grade I listed church, and six Grade II* buildings). There are, in addition, 30 other entries outside the designated area, in places such as Shawford and the Frome Road/Church Row area around the Church of St Lawrence.

The recent evaluation by Somerset Council, which included a parcel of land adjacent to the proposed development, highlighted the open nature of the surrounding agricultural character which is an important feature of the village setting.

RPC believes that the proximity of the proposed solar farm would destroy the essential feature that defines Rode as a rural village: the open landscape that surrounds it.

In conclusion, the boundary of the 170-acre proposed development would lie less than 200 metres from the edge of the village, with its entire footprint within a 2 kilometres distance from the village centre. Its proximity and size would dominate the local landscape character and significantly harm the historic setting of Rode both as a rural settlement and a conservation area. This intrusive industrial development, more than twice the size of the village, should be refused because of its harmful impact on Rode’s historic rural setting.

Rode is a jewel in the crown of Somerset’s rural heritage, and it is vital that the setting of the village is preserved.

3. Planning Policies

Both local planning policies and national policy guidance clearly demonstrate that this is NOT an appropriate location for a large scale solar farm.

National policy guidance

The Government's planning practice guidance on Renewable and low carbon energy (PPG) provides guidelines in relation to the importance of environmental issues and the need to prioritise the use of previously developed and non-agricultural land.

"The National Planning Policy Framework explains that all communities have a responsibility to help increase the use and supply of green energy, **but this does not mean that the need for renewable energy automatically overrides environmental protections** and the planning concerns of local communities. As with other types of development, it is important that the planning concerns of local communities are properly heard in matters that directly affect them." (PPG)

PPG: 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.

Planning Policy Guidance on the siting of solar farms provides guidance on how local planning authorities can identify suitable areas for renewable and low carbon energy. This states that "In considering impacts, assessments can use tools to identify where impacts are likely to be acceptable. For example, *landscape character areas could form the basis for considering which technologies at which scale may be appropriate* in different types of location. Landscape Character Assessment is a process used to explain the type and characteristics of landscape in an area. Natural England has used Landscape Character Assessment to identify 159 National Character Areas in England which provide a national level database. Landscape Character Assessment carried out at a county or district level may provide a more appropriate scale for assessing the likely landscape and visual impacts of individual proposals."

In this respect, Rode is within the Avon Vales National Character Area of Natural England... Avon Vales is described as an area that "can easily be overlooked, surrounded as it is by the high-quality designated landscapes of Cotswolds AONB and North Wessex Downs AONB...but it has a restful and undramatic calm of its own"

Natural England's document highlights four "Statements of Environmental Opportunity" (SEOs) for the Avon Vales area, of which SEO 4 has the objective to: "Protect and manage the varied rural landscape of small urban areas amid gently rolling arable and pasture, and thick hedges interspersed with small woods, securing wide-ranging views, reinforcing landscape character, preventing soil erosion, promoting sense of place and tranquillity, and providing recreational benefits."

These objectives would be delivered in a number of ways, including:

- Protecting against insensitive development and/or alterations that would impact on the rural character, ensuring that buildings reflect traditional styles and methods such as limestone ashlar.
- Working with the local community to foster the mixed agriculture and the sense of place that this brings, as well as in the interests of food production.

The document highlights that "Pressure for solar farms and panels is already intense and there is concern for the impact on the landscape should they become widespread and established. There may be wide views over seemingly unused fields, and little farm traffic, but at an uncertain cost."

Included in the "landscape opportunities" are the recommendations to:

1. Protect the many small well-established villages, particularly their historic cores, settlement pattern, green spaces and notable buildings, and the narrow winding lanes that connect them aiming to retain their sense of isolation while ensuring viable and vibrant local communities.
2. Seek to maintain the connections between settlements and their agricultural and historical origins.
3. Manage heritage assets which provide a sense of history and contribute to the landscape.

It is clear, therefore, that applying the government's Policy Planning Guidance would acknowledge Rode's location within the Avon Vales National Character Area. Delivering against the related objectives requires protecting against insensitive development that would impact on the rural character, fostering mixed agriculture, and recognising the sense of place, etc. **Permitting the construction of a very large solar farm and covering 170 acres of countryside in close proximity to a historic village with metallic structures is the very antithesis of the objectives set out in the PPG.**

Local Planning Policy

The Mendip Local Plan states that "In the Open Countryside, in line with national policy, new development will be strictly controlled." Core Policy 4 (Rural Development) sets out the overall approach which the Council will take in the rural area beyond that which is set out in the Spatial Strategy (Core Policy 1 [CP1]).

CP1: Development in the open countryside will be strictly controlled but may exceptionally be permitted in line with the provisions set out in Core Policy 4: Sustaining Rural Communities....Any proposed development outside the development limits, will be strictly controlled and will only be permitted where it benefits economic activity or extends the range of facilities available to the local communities.

There is only one reference of relevance within CP4, which states that "Rural settlements and the wider rural area will be sustained by...supporting proposals for development of the rural economy which....enable the establishment, expansion and diversification of business in a manner and of **a scale which is appropriate to the location** and constraints upon it."

In this case, the scale of the proposed development is out of all proportion to its location – as noted elsewhere, the solar farm would be two and half times larger than the village, and would be **the largest solar farm in Somerset (and amongst the very largest in Great Britain)**

MDC also sets out a checklist, against which all development proposals should be assessed. This includes the requirement that **“Landscape, biodiversity and heritage impacts must be key considerations in the selection of sites for development”**

Development Policy 1 [DP1]: Local Identity and Distinctiveness

All development proposals should contribute positively to the maintenance and enhancement of local identity and distinctiveness across the district. Proposals should be formulated with an appreciation of the built and natural context of their locality recognising that distinctive street scenes, townscapes, views, scenery, boundary walls or hedges, trees, rights of way and other features collectively generate a distinct sense of place and local identity. Such features may not always be designated or otherwise formally recognised.

Where a development proposal would adversely affect or result in the loss of features or scenes recognised as being distinctive, the Council will balance up the significance of the feature or scene to the locality, the degree of impact the proposal would have upon it, and the wider benefits which would arise from the proposal if it were approved. Any decisions will also take into account efforts made by the applicant to viably preserve the feature, avoid, minimise and/or mitigate negative effects and **the need for the proposal to take place in that location.**

DP3: Heritage Conservation

Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance and setting of the district’s Heritage Assets, whether statutorily or locally identified, especially those elements which contribute to the distinct identity of Mendip.

Proposals affecting a Heritage Asset in Mendip will be required to...Justify any harm to a Heritage Asset and demonstrate the overriding public benefits which would outweigh the damage to that Asset or its setting. The greater the harm to the significance of the Heritage Asset, the greater justification and public benefit that will be required before the application could gain support.

DP4: Mendip’s Landscapes

Mendip district is defined by its landscapes. Proposals for development that would, individually or cumulatively, significantly degrade the quality of the local landscape will not be supported. Any decision-making will take into account efforts made by applicants to avoid, minimise and/or mitigate negative impacts and the need for the proposal to take place in that location.

The following criteria will be applied in relation to particular landscape designations present in the district....Outside of designated landscape areas, **proposals should demonstrate that their siting and design are compatible with the pattern of natural and man-made features of the Landscape Character Areas**, including cultural and historical associations, as detailed in the "Landscape Assessment of Mendip District."

Rode Neighbourhood Plan Policy 5 – Settlement Boundary

This states that *"Outside the defined settlement boundary land is defined as 'open countryside' and development here will not normally be permitted unless it complies with other policies in the Mendip development plan."* The Local Plan does not include a policy specifically related to solar energy or renewable energy – however, the proposed scheme is clearly contrary to Mendip Policies CP1, DP1, DP3 and DP4.

Rode Character Assessment

The Rode Character Assessment document provides the evidence base for policies in the Rode Neighbourhood Plan. It was prepared with the assistance of the planning consultancy, Planning Aid, using the BANES methodology. The Conservation Area Appraisal also assisted the analysis. The assessment highlights [G8] that **"Development should be of a sympathetic scale to the village, and reduce negative visual impact to a minimum."**

4. Site selection

The applicant limited their site selection process to potential sites 500 metres either side of the overhead powerline between Melksham and Frome (23 km in length). In other words, the applicant looked at an area of approximately 23km² (around 9 sq miles). For context, Somerset is 1,610 sq miles, and the UK approx. 96,000 sq miles.

The applicant has therefore limited their search to an area approx. 0.5% of the land mass of Somerset (ie, they ignored 99.5% of the county), and an infinitesimally small part of the whole country. With such an almost unbelievably limited site selection process it is impossible to draw any conclusions as to the relative suitability of the site.

The applicant has sought to restrict its selection process to a small section of overhead power line, based on the availability of a grid connection. However, **it has been established that the availability of a grid connection is not a material consideration for the purposes of determining a planning application** [eg: the appeal decision in Sawston Solar Park (APP/W0530/W/15/3012014 and APP/W0530/W/15/3013863) established that: *"A connection to the national grid is an essential site requirement and the availability of a connection in a part of the network with capacity to accept the output is of assistance to the*

appellant but it does not bring a public benefit and adds no weight to the planning case for the proposals.”]

Need to consider alternatives

The proposed development is a large application on an unallocated site within the open countryside. It is clearly contrary to a number of key local policies and national guidelines. It will have many adverse impacts, and has been the subject of significant local opposition. As there is no proper analysis of the availability of alternative sites on poorer quality agricultural land (either elsewhere in Somerset or more widely), the application makes it impossible for Somerset Council to consider whether these significant material planning impacts could be avoided through the provision of the proposed development on an alternative site.

The issue of alternatives was considered by the Court in *Trusthouse Forte Hotels Ltd v SSE* [1986]. In *Trusthouse*, the Court stated as follows (emphasis added):

“(1) Land (irrespective of whether it is owned by the applicant for planning permission) may be developed in any way which is acceptable for planning purposes. The fact that other land exists (whether or not in the applicant's ownership) upon which the development would be yet more acceptable for planning purposes would not justify the refusal of planning permission upon the application site.

(2) Where, however, there are clear planning objections to development upon a particular site then it may well be relevant and indeed necessary to consider whether there is a more appropriate alternative site elsewhere. This is particularly so when the development is bound to have significant adverse effects and where the major argument advanced in support of the application is that the need for the development outweighs the planning disadvantages inherent in it.

(3) Instances of this type of case are developments, whether of national or regional importance, such as airports (see the *Rhodes* case), coalmining, petro-chemical plants, nuclear power stations and gypsy encampments (see *Ynstawe, Ynysforgan and Glais Gypsy Site Action Group v. Secretary of State for Wales and West Glamorgan County Council.*) Oliver L.J.'s judgment in *Greater London Council v. Secretary of State for the Environment and London Docklands Development Corporation and Cablecross Projects Ltd.* suggests a helpful although expressly not exhaustive approach to the problem of determining whether consideration of the alternative sites is material: ... comparability is appropriate generally to cases having the following characteristics: First of all, the presence of a clear public convenience, or advantage, in the proposal under consideration; secondly, the existence of inevitable adverse effects or disadvantages to the public or to some section of the public in the proposal; thirdly, the existence of an alternative site for the same project which would not have those effects, or would not have them to the same extent; and fourthly, a situation in which there can only be one permission granted for such development, or at least only a very limited number of permissions.

5. Impact on Heritage Assets

The PPG states that “great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, **including the impact of proposals on views important to their setting**”

The site is close to a number of important Heritage Assets:

- To the south west of the proposal is the Grade I listed Church of St Lawrence which retains open views out from the churchyard boundary to the surrounding rural

hinterland. Earthwork remains surrounding the church indicate the potential for medieval origins of Church Row which is protected by a Conservation Area.

- Just to the south of the proposal is the Devils bed and Bolster long barrow. The burial mound is considered of **national significance** and was constructed about 5,000 years ago.
- There are eight listed buildings near the application site:

Flexham Farm

Frith Farm

No 8 Frome Road

Parsonage Farm House

No 8 (The Old Rectory) Bradford Road

Nos 18 and 20 Bradford Road

No 2 (Clay Lane House) Bradford Road.

The impact on the Bradford Road properties was partially addressed by the removal of the triangular field prior to submission of the application. However, the impact on Flexham Farm (and to a slightly lesser degree Frith Farm) is significant. This is despite the fact that the applicant has made some minor alterations to the proposed layout.

Flexham and Frith Farms are sited opposite each other on Bradford Road about 1 km. from the top of Rode Hill. They date from the 18th century, albeit the history of the site of Frith Farm dates much further back....Frith takes its name from an area mentioned in a 1286 report of poaching, when "Nicholas de Montford of Tellesford and Richard le Vag entered the forest at La Frith near Telesford and netted a stag."

In its revised proposal the applicant repeats its views that the rural setting does not contribute to the significance of the conservation area or the listed buildings. Its basic argument is that only the architectural details of the listed buildings contribute to significance, not the rural setting. This line of argument has been rejected many times by appeal inspectors, who say that the rural surroundings do contribute to heritage significance of listed buildings and scheduled monuments. In the case of Flexham farm and Frith farm, the Applicant further argues that they are not functional farms anymore - but the point is that they are historic listed farmhouses and their significance as such greatly depends on being surrounded by fields.

6. Statement of Need

The applicant's document broadly sets out the arguments in favour of generating more low carbon energy nationally, but does nothing to address the issue of why the related "need" requires development of the site in question. In addition it seeks to use Somerset's Climate Emergency Strategy to support the case for this site, but mis-represents that strategy in a number of fundamental ways.

The Statement of Need purports “to explain the urgent need for the proposed development.” However, in reality the document simply sets out the general need for more renewable and low carbon energy generation.....It is obvious that we need more renewable and low carbon energy, in the same way that we need more houses – but this doesn’t mean that such developments should be sited anywhere. As for new housing, solar parks need to be located in the right place, in line with local and national planning policies. The document does nothing to address the question as to why there is an urgent need for this particular development.

RPC does not dispute the need for a switch to low carbon energy, globally, nationally and regionally. However, it would be illogical to require all of Somerset’s energy needs to come from low carbon energy produced within the county....this fundamental issue is referenced very clearly in the PPG: “Whilst local authorities should design their policies to maximise renewable and low carbon energy development, **there is no quota which the Local Plan has to deliver.**”

If each county in the UK adopted the approach suggested in the “Statement of Need” it would self-evidently result in large numbers of inappropriate locations being used for low carbon energy production, in order to satisfy an individual county’s needs, whilst other excellent locations might remain unexploited, because that particular county had already satisfied its own needs. At the same time, it is worth mentioning that before the end of the decade Somerset will be producing far more low carbon energy than it has a need for, via the Hinkley Point C power station. This facility will generate 3.2GW of electricity - sufficient to power 6 million homes.

In addition, it is important to recognise the wider context of solar development nationally: “The UK currently has a mix of rooftop and ground-mounted solar installations providing **14 GW** of solar capacity. Projects for around **40GW** of utility-scale solar capacity are in the pipeline, although only 7GW currently has local planning permission.” [Source: House of Commons report – Decarbonisation of the Power Sector, April 2023]. Some of the largest projects are listed below [source: S&P Global, December 2023]. So, whilst the government has set an ambitious target of 70GW of solar by 2035, existing projects, together with those currently in the pipeline, already account for over 75% of this total, with over a decade to go.

Further, research undertaken in 2023 by University College London (UCL) Energy Institute concluded that “although ground-mounted solar projects will be needed in the short term to hit national decarbonisation, installing solar panels on new buildings, existing large warehouse rooftops and other land such as car parks, could provide at least **40-50GW** of low carbon electricity, contributing more than half of the total national target of 70GW of solar energy by 2035.” Even if this is a significant over-estimate, it is likely that the UK government target of 70GW of solar energy by 2035 could be achieved with limited new greenfield development, over and above the existing pipeline.

Pipeline of giant UK solar projects surpasses 11 GW

Project	Location	Solar capacity (MW)	Developer(s)	DCO status
Cleve Hill	Kent	373	Quinbrook Infrastructure Partners Pty. Ltd.	● May 2020
Little Crow	Lincolnshire	150	INRG Solar Ltd.	● April 2022
Longfield	Essex	500	EDF Renewables	● June 2023
Sunnica	East Cambridgeshire/ West Suffolk	500	PS Renewables; Tribus Clean Energy Ltd.	● November 2021; Government decision deadline March 7, 2024
Mallard Pass	Lincolnshire/Rutland	350	Windel Energy Ltd.; Canadian Solar Inc.	● November 2022
Cottam	Lincolnshire/ Nottinghamshire	600	Island Green Power UK Ltd.	● January 2023
Gate Burton	Lincolnshire	500	Low Carbon Investment Management Ltd.	● January 2023
Heckington Fen	Lincolnshire	500	Ecotricity Group Ltd.	● February 2023
West Burton	Lincolnshire/ Nottinghamshire	480	Island Green Power UK Ltd.	● March 2023
East Yorkshire	East Yorkshire	400	Boom Power Ltd.	● November 2023
Oaklands Farm	South Derbyshire	163	BayWa r.e. AG	● January 2024
Stonestreet Green	Kent	99.9	Evolution Power Ltd.	● January 2024
Byers Gill	County Durham	180	RWE AG	● January 2024
Dean Moor	Cumbria	150	ib vogt GmbH; Firma Energy Ltd.	● Q1 2024
Tillbridge	Lincolnshire	>50	Tribus Clean Energy Ltd.; Canadian Solar Inc.	● Q1 2024
Fenwick	South Yorkshire	237.5	Boom Power Ltd.	● Q2 2024
Frodsham	Cheshire	150	Cubico Sustainable Investments; Peel NRE.	● Q2 2024
Springwell	Lincolnshire	800	EDF Renewables; Luminous Energy	● Q2 2024
Tween Bridge	South Yorkshire/North Lincolnshire	600	RWE AG	● Q2 2024
Beacon Fen	Lincolnshire	400	Low Carbon Investment Management Ltd.	● Q2/Q3 2024
Botley West	Oxfordshire	840	Photovolt Development Partners GmbH	● Q3 2024
Peartree Hill	East Yorkshire	320	RWE AG	● Q3 2024
Maen Hir	Anglesey	350	Lightsource BP Renewable Energy Investments Ltd.	● Q4 2024
East Park Energy	Cambridgeshire	400	RNA Energy Ltd.	● Q1 2025
One Earth	Nottinghamshire	740	Ørsted A/S; PS Renewables.	● Q1 2025
Rosefield	Buckinghamshire	500	EDF Renewables; PS Renewables	● Q1 2025
Great North Road	Nottinghamshire	800	Elements Green Ltd.	● Q2 2025
Temple Oaks	Lincolnshire	250	Ridge Clean Energy Ltd.	●

● Consent granted ● Application submitted ● Application expected ● No timetable

Data accessed Dec. 13, 2023.

DCO = development consent order.

Sources: UK Planning Inspectorate; S&P Global Commodity Insights analysis.

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These facts should not downplay the obvious need to actively seek additional sites for solar PV....but in this context it is extremely important that new sites are well-chosen. There are many existing brownfield and low-grade sites across the UK which would be far more appropriate as solar farm locations. Given the huge strides already being taken towards the 70GW target, and the clear availability of alternative sites in less damaging locations, it would be a travesty if this very large-scale development were permitted in open countryside adjacent to the historic village of Rode.

7. Poor Access

Somerset Highways has previously raised concerns about the access route to Parcel 3 of the proposed development (which includes the Battery Electrical Storage System [BESS]). Whilst the applicant has provided a number of responses to these points, RPC remains concerned:

- The “passing places” are, in fact, the entrances to local residents’ drives;
- The lane is narrow and the verges unstable;

- It would be extremely dangerous if a large vehicle needed to reverse out on to the A361 (which has a 60mph speed limit at that point) – eg: because passing was not possible;
- Access for emergency vehicles could easily be compromised by vehicles already in the road (given the difficulty of reversing along the lane).

The images below illustrate the narrow width of the lane, the implausibility of using the verges to pass, and the unsuitability of the “passing places”:



In addition, Somerset Highways appears to have focussed on the use of Monkley Lane during the construction period – but seems to have ignored the fact that this is the only

access point to the BESS, and therefore the only route for emergency vehicles in the case of a fire.

The issues raised above could, however, easily be resolved. An alternative access route exists, via Rode Farm, which is already planned to provide access to the Parcel 2 land. Some further improvements could be made to facilitate access to Parcel 3. Apart from resulting in a safer access route for construction and emergency vehicles, such a change would also avoid the considerable inconvenience to the residents of Monkley Lane.

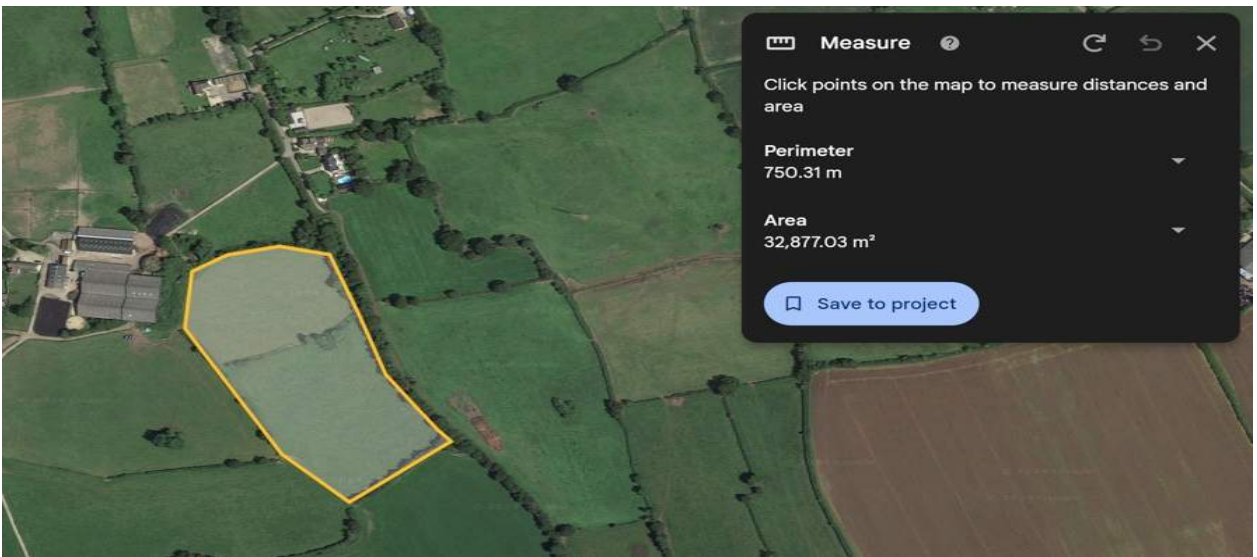
It may be that Somerset Highways has not undertaken a site visit to ascertain the extent of the issues highlighted – in which case, RPC would urge Highways to make such a visit, and ideally meet with the residents of Monkley Lane to better understand their concerns.

8. Land use and classification

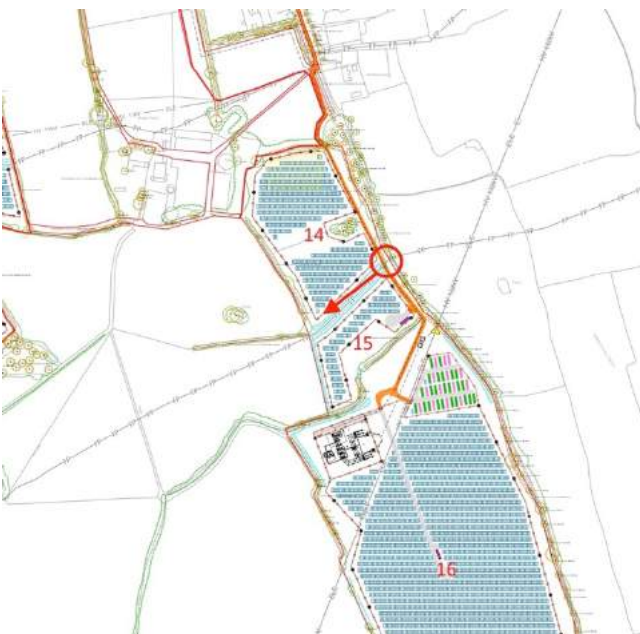
The applicant has submitted an agricultural land quality survey which indicates that the majority of the land is classified as 3b (moderate quality). However, 2.7 ha (6.7 acres) is grade 3a (good quality, and included within the definition of Best and Most Versatile [BMV] land), and – despite its classification – parts of the 3b classified land appear to support excellent crop growth. Indeed, the applicant has, themselves, stated that **“the Site comprises intensively farmed agricultural land”** [Planning, Design & Access Statement, para 8.47], which logically implies high yields – at odds with the results of the report commissioned by the applicant.

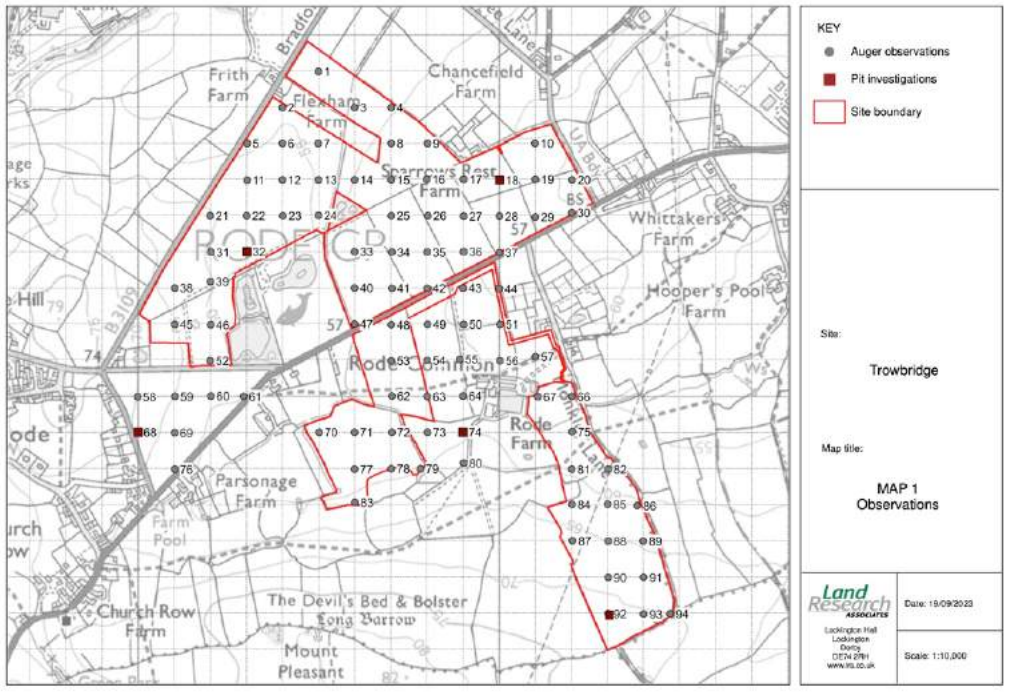
The land in Parcel 3 appears to be most favourable for crop growth – containing the parts of the site classified as grade 3a, and also being home to vigorous maize crops in the past (see photos below and on the next page, taken in summer 2023).



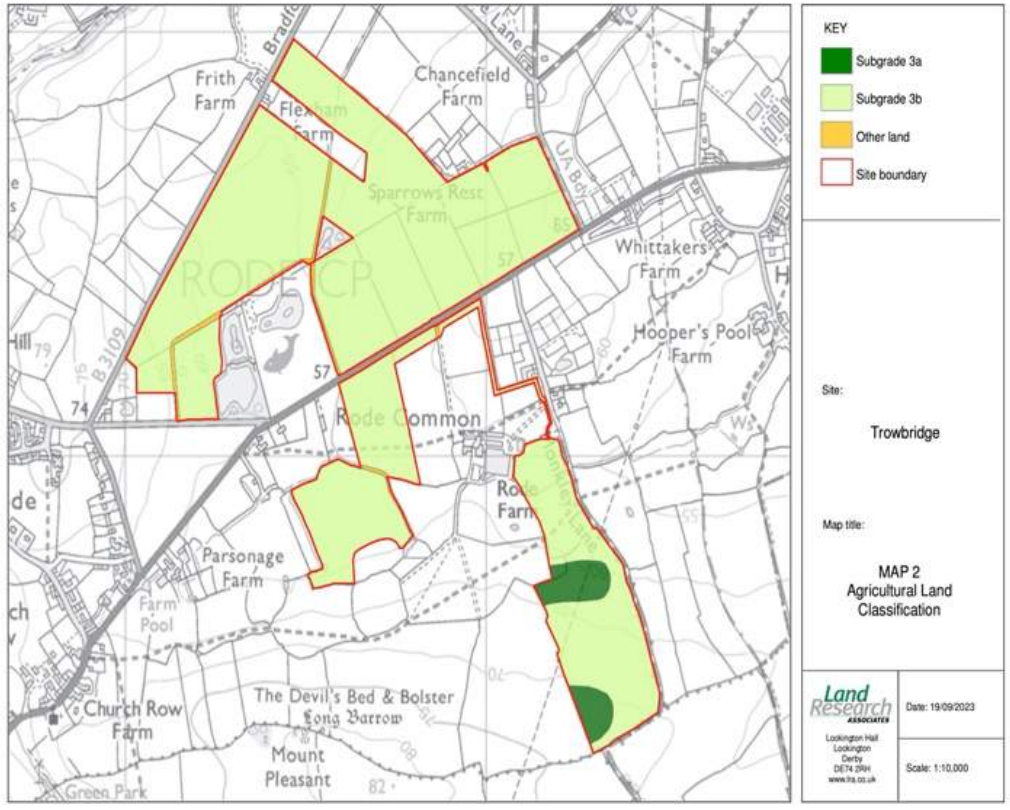


Above: Google Earth image showing the area of the crop (3.3 ha, 8.1 acres). Below: Location and direction of photographs taken in July 2023.





Above: Plan showing locations of Auger bore holes. The area containing points 66, 67, 75 and 81 was successfully planted with maize last summer (see images on previous pages). These bore holes were apparently either too dry (75) or too wet (66, 67 and 81) to support good crop growth – albeit the evidence of last summer would suggest otherwise.



Above: plan of proposed solar farm land, showing land classification (grade 3a in dark green)

Given the widespread concerns regarding food security, and the need to preserve good quality agricultural land, RPC believes that – as a very minimum – the land categorised as 3a should NOT be developed [nb: Mendip District Council has previously rejected applications on BMV (eg: Land off Easton Lane, Pylle [2014/1174/FUL]). **In addition, RPC believes strong consideration should be given to reviewing the categorisation of the land**, in particular the land within Parcel 3 – which appears to support healthy and vigorous crops – and removing those areas which have been shown to produce reasonable yields.

9. Cumulative Impact

There are already six existing solar farms located within 5km of Rode, and soon to be a 7th less than 3km away (this is large scale (29MW) Solar Farm recently granted permission, adjacent to the West Wilts Trading Estate at Storridge Road, Westbury). Another large (20MW) solar farm is on the outskirts of Trowbridge, 5km away, together with a number of smaller, much closer developments. Historic England has emphasised the harm of cumulative impacts of multiple solar farms in this area, and the negative impact of cumulative developments is highlighted in the PPG as an issue which planners need to consider.



The map above LEFT shows the local area (existing solar farms and those with (or seeking) planning approval are marked with yellow dots). The map above RIGHT shows all solar farms (> 5MW) in and around the Mendip area. As can be seen, there is a clear cluster in close proximity to Rode – albeit, as Rode abuts the county boundary, all the adjacent developments are in Wiltshire. [Source: Dept for Energy Security & Net Zero].