

RODE PARISH COUNCIL – RESPONSE TO FURTHER RE-CONSULTATION PROPOSED SOLAR FARM AT RODE

Planning Application 2023/2183/FUL

Dear Sir/Madam,

As we have previously stated, 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 second 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 further changes made to the scheme, following the Planning Committee meeting on 7th May are extremely minor and only partially address the concerns raised by the Committee. In addition, since that meeting the Government has issued a Written Ministerial Statement (WMS) highlighting a number of important issues which are directly relevant to this planning application (Ref: Ministerial statement UINHCVS466 of 15 May 2024).

The Parish Council also wishes to highlight two further issues which have emerged since the last consultation exercise: Firstly, the research undertaken by UKRI Centre for Doctoral Training in Environmental Intelligence based at the University of Exeter, on behalf of Friends of the Earth; and Secondly the recent decision by Somerset Council to **refuse** the application for a proposed solar farm at Nythe Road, nr Street [2023/1892/FUL]. This application had a number of similarities to the proposed development at Rode.

The above issues are discussed in more detail in the sections below:

1. Response to concerns raised by the Planning Committee
2. Written Ministerial Statement dated 15th May
3. Research carried out on behalf of Friends of the Earth
4. Similarities with Nythe Road, nr Street [2023/1892/FUL]

This document therefore seeks to comment solely on the latest revisions to the proposed scheme, together with issues which have emerged subsequent to the May Planning Committee meeting. Rode Parish Council continues to have a large number of other objections to the proposal, which are set out in previous submissions to Somerset Council.

Section 1: Response to concerns raised by the Planning Committee:

a. Scale in terms of quantum

The changes made to the proposed development are immaterial in terms of quantum – in fact, according to the applicant's documentation, the land area of the solar farm appears to

be *slightly larger* in the latest submission to Somerset Council [the additional documentation refers to a site of 79.3 hectares, which is in fact slightly larger than the 74.3 hectares noted in the applicant's Design & Access Statement, submitted in November 2023].

The sheer scale of the proposed development needs to be put in context, both locally and nationally. The footprint of the development will be **two and a half times the size of the village of Rode**. Currently, according to the Renewable Energy Planning Database maintained by the Department for Energy Security and Net Zero, there are only **two** operational solar farms in the whole of the UK which are larger than the development proposed in Rode. Whilst this picture will change in the coming years as more solar farms are built, it should be noted that this proposed development is still the joint second largest currently planned in the whole of the South West (this includes all current and proposed developments listed on the Government database).

Rode Parish Council is extremely disappointed that the applicant has chosen not to engage with the local community in a bid to arrive at a development of appropriate scale for the location. The Parish Council has been very clear that it would be supportive of a reduced development which balanced the damage to the local environment with the desire to make a meaningful contribution to carbon reduction.

b. Scale in terms of impact on landscape and heritage assets

The applicant has made a further small change which will have some positive impact on the setting of one property....however, this will make no difference whatsoever to the solar farm's impact on landscape. In addition, the proposed hedging along Bradford Road clearly does not address the scale issue that committee members highlighted. And whilst hedge planting will no doubt eventually (when mature) help to screen the solar farm during summer, the additional planting (like all the applicant's proposed planting) is deciduous, and will provide little in the way of screening from October through to April (more than half the year). Whilst the Conservation Officer has accepted that the proposed changes result in a lesser impact to the significance of the surrounding heritage assets, the substance of their previous objections have been almost completely ignored – in particular the recommendations set out in the submission dated 12th March: "More could be done to reduce the level of harm, including the removal of Development Zone 1,2,3,4 and 5."

c. Access

The Planning Committee expressed concern about the use of Monkley Lane to access the development. This concern was not limited to the construction period, although the applicant has chosen to address only this issue.

The applicant has not addressed the issues regarding emergency vehicle access which are set out in Rode PC's objection (dated 16th December 2023), and also in the letter from Shaun Freeman (dated 14th March). Monkley Lane does not meet the requirements set out in the

guidance produced by the National Fire Chiefs Council (NFCC) (which Planning Authorities must take into consideration) – principally due its narrow width, but also in a number of other respects. The submission from Devon and Somerset Fire & Rescue clearly states "In terms of vehicular access, road and gateway widths and the provision of suitable hardstanding's should be in accordance with B5 of the Building Regulations." Monkley Lane does not meet these requirements, and should NOT be used for emergency vehicle access. The applicant has not addressed this issue, and has stated that they will discuss and agree the detail of emergency vehicle access (with the fire authority) AFTER any approval. Given that emergency vehicle access is such a fundamental issue in this proposed development it would seem critical to resolve such details prior to application.

The applicant has made *some* changes to the proposed development, and is now suggesting that all vehicle access during the construction phase is made using a new temporary road to be constructed on land adjacent to Monkley Lane. The information relating to this new access route is rather limited....it appears that the route will cross two fields, but it is not clear how it will be constructed (materials, design, etc).

Given the new route will need to be constructed to cater for multiple journeys by heavy goods vehicles (including articulated HGVs over 50 feet long) over an extended period, it would make sense for this route to continue in use, and to be the point of access for emergency vehicles, etc.

Rode PC therefore requests that – if the application is approved – the revised access point set out in the applicant's Updated Access Strategy be made permanent, and that ALL vehicular access to Parcel 3 is required to use this access, for the life of the development. For the avoidance of doubt, this should include emergency vehicles and all vehicles requiring access for maintenance, inspection, etc, etc. Such an approve would ensure that the access route can be designed specifically to cater for emergency vehicle access, and remove he existing uncertainty.

Section 2: Written Ministerial Statement dated 15th May

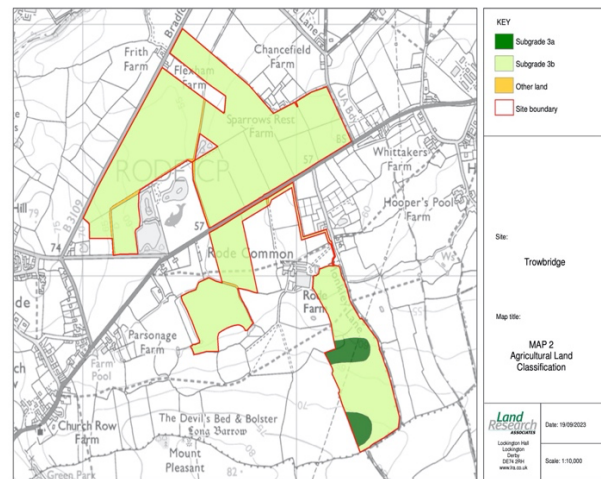
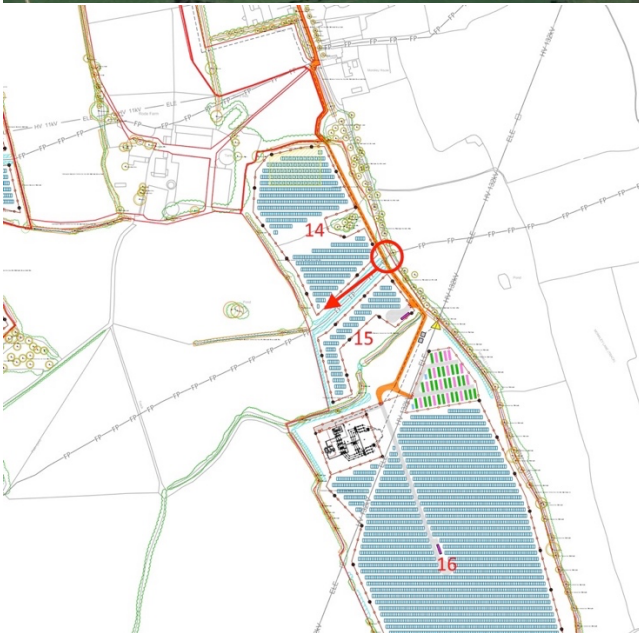
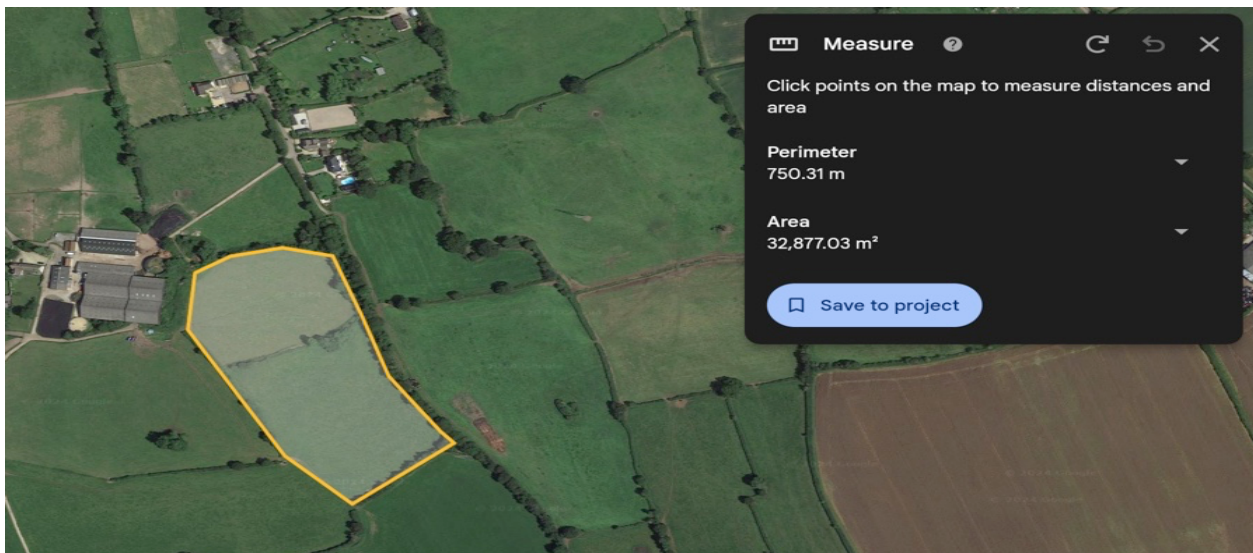
Claire Coutinho, the minister for Energy Security and Net Zero, issued a Written Ministerial Statement (WMS) on 15th May in response to increasing government concerns regarding the impact of solar farms on food security, and related issues. This statement was made just after the May Planning Committee meeting, and therefore Committee members were unable to take these matters into consideration in their deliberations. As a result of the deferral these issues can now be addressed by the Committee:

- **Food Security.** The WMS recognises that food security is of "paramount importance" and that **"we think it is more important than ever that our best agricultural land is protected and our food production prioritised."** The WMS says that "the highest quality land is the

least appropriate for solar development, and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary”.

This planning application includes 2.7 ha (6.7 acres) of land graded 3a (good quality, and included within the definition of BMV land). In addition 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. For example, photos taken in July 2003 (see below) show a vigorous maize crop [the Google Earth image shows the area of the crop (3.3 ha, 8.1 acres)]





Above left: Location and direction of photographs taken in July 2023. Above right: 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, Rode PC 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, Rode PC 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.

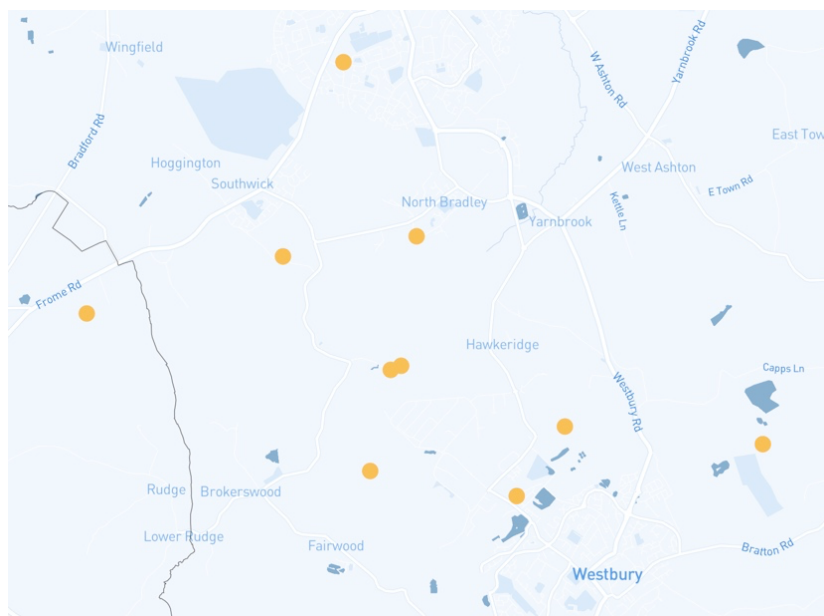
- **Soil surveys.** The WMS highlights general concerns about “perceived inaccuracy and unfairness” of soil surveys undertaken by applicants - Rode PC (in its submission of 12th March) recommended that Somerset Council consider reviewing the categorisation of the land, especially that land in Area 3 (Development Zones 14, 15 and 16, around the battery

storage area). Given the concern that the Government clearly has about food security, and the scale of this proposed development, it would be a sensible precaution to validate the applicant's soil survey. This could easily be undertaken over the next month or so, prior to the expiry of the three month deferral period.

- **Cumulative Impacts.** Rode PC's objection dated 12th March highlighted concerns about the number of solar farms in the vicinity of the village, and the potential cumulative impact created by this proposed further development. Unfortunately this issue was not commented on by either the Planning Officer, or by the applicant [in their responses]. However, the damage created by cumulative impacts is highlighted in the WMS: **"When considering whether planning consent should be granted for solar development it is important to consider not just the impacts of individual proposals, but also whether there are cumulative impacts where several proposals come forward in the same locality."**

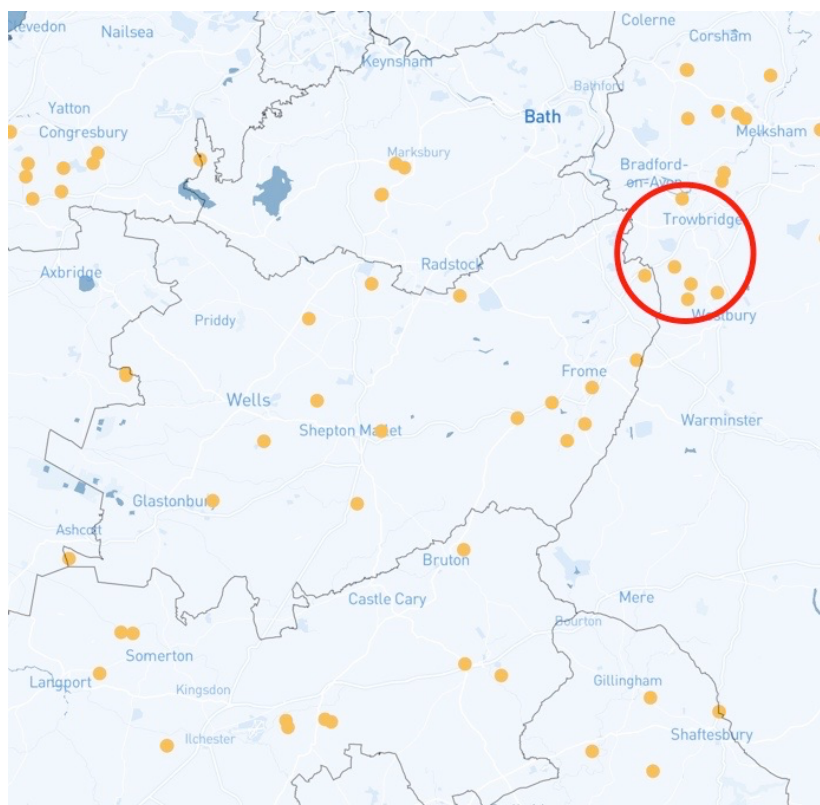
Historic England have also emphasised the harm of cumulative impacts of multiple solar farms in this area, and the negative impact of cumulative developments is highlighted in the PPG as an issue which planners need to consider.

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 under construction 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.



The map above shows the local area (existing solar farms and those with (or seeking) planning approval are marked with yellow dots) [Source: Dept for Energy Security & Net Zero].

The map below 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.



Section 3: Research carried out on behalf of Friends of the Earth

In relation to the suitability of the development site and Alternative Site selection, Friends of the Earth recently published a significant study which looks at the whole of the country and seeks to identify suitable sites for renewable energy.

Friends of the Earth worked with the UKRI Centre for Doctoral Training in Environmental Intelligence based at the University of Exeter to identify the land that could be most suitable for new onshore renewable energy...they used a range of criteria, including being mindful of the issues relating to wind and solar farms close to sites of heritage...eg: *"For both wind and solar we've added 1 km buffers around all Grades I and II* buildings, 2 km buffers around registered parks and gardens, and 500 meter buffers around scheduled monuments. In many cases smaller buffers may be appropriate."* [In the context of Rode, the only two buildings which are relevant here are St Lawrence Church (Grade I) and Christchurch (Grade II*)]

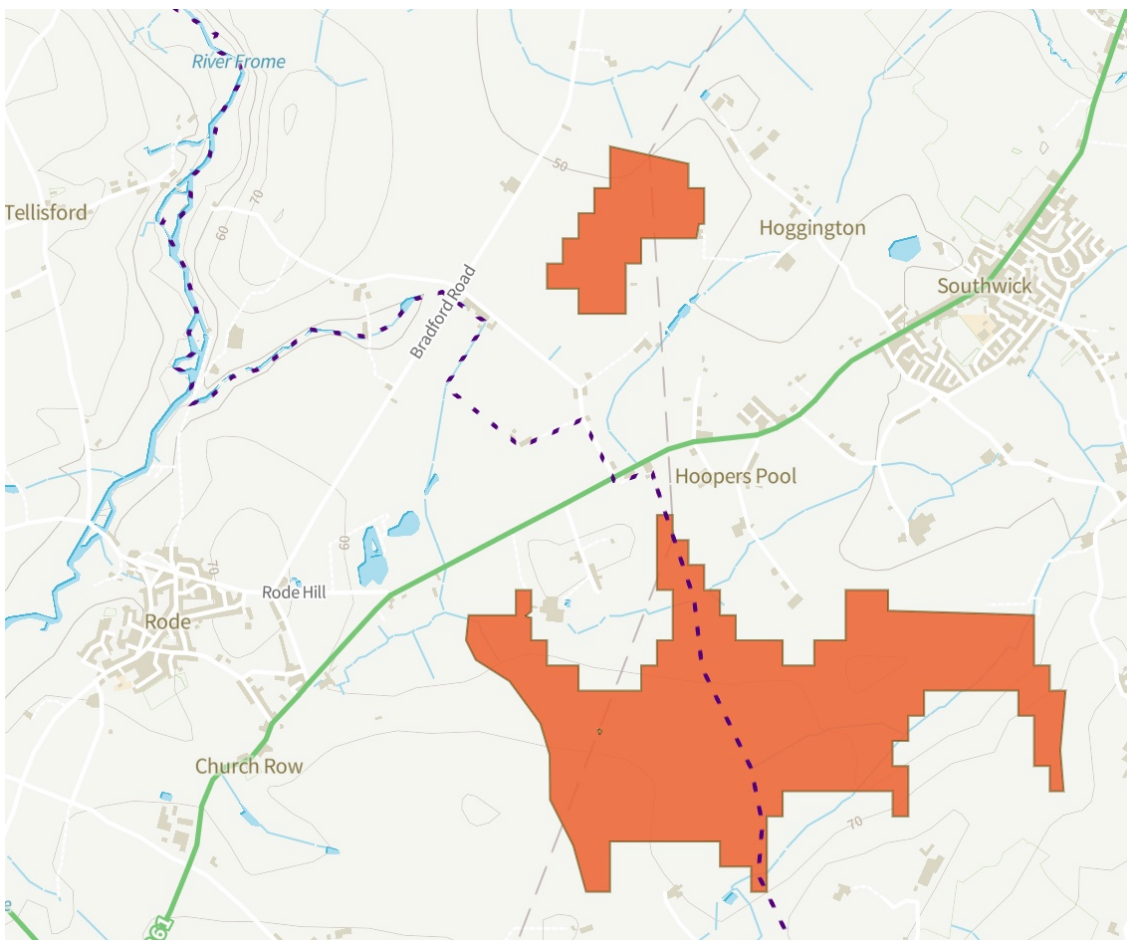
The research concludes that:

*"Even with this conservative approach, we've identified 2,198 km² of land most suitable in England for onshore wind (1.7% of all land) and 2,950 km² for solar farms (2.3% of all land). This is equal to 2.9% of land overall due to much land being suitable for both, and has the theoretical potential to equal 95,542 GWh of onshore wind energy and **130,421 GWh of solar energy per year.**"*

If this capacity was fully developed (although we're not advocating for this due to the abundance of offshore energy potential also available) and if wind was prioritised above solar on sites that are suitable for both, this land would produce 13 times the current onshore wind and solar electricity generation across England. This is equivalent to more than 2.5 times the electricity currently consumed by homes (20% of total energy consumption). This shows that, alongside estimates for huge offshore wind potential, offshore solar and rooftop solar, the UK not only easily has the potential to meet its own energy needs, but it could also become a green energy superpower exporting clean, cheap, green electricity to other countries."

This exercise is significant in the context of the proposed Solar Farm at Rode - it identifies some of the proposed land as being suitable (and indeed includes more land, to the east and north-east of the proposed site, as being suitable). It would exclude some of the land on the approach to the village (to the south of Bradford Road, this would be within a 1km radius of Christchurch). Fundamentally it shows that a significant area of land locally IS suitable....but this lies significantly further away from the village, and would have much reduced impact on the historic setting of Rode. The study can be found here: <https://policy.friendsoftheearth.uk/insight/how-england-can-produce-more-onshore-renewable-energy-fast>

The map below is an extract from the research, showing land designated as suitable for solar in the locality of Rode:



The most significant conclusion is that it is completely unnecessary to extend the Solar Farm so close to the village of Rode.....sufficient land identified by FotE extends further to the east to enable the construction of a Solar Farm of scale which would impact on the setting of the village, and its heritage assets, to a far lesser extent. In addition, the applicant's argument that the site - as proposed - is essential to meeting the UK's renewable energy requirements does not stand up to independent analysis.....FotE has identified land capable of generating 130MW of Solar **without the need to impinge on heritage assets**. They have also identified land that can support a further 95MW of wind energy. The two together, as stated above, would provide twice as much energy as all the country's homes currently require. And all this without counting the UK's huge potential for off-shore renewables, or the existing potential for rooftop solar. The UK can massively out-produce our domestic requirements for energy without needing to build Solar Farms in close proximity to historic villages.

Section 4: Similarities with Nythe Road, nr Street [2023/1892/FUL]

This proposed 59 hectare development, part of which sits in the former Mendip DC area, was refused by Somerset Council on 29th May 2024. There were ten reasons for refusal, including the two noted below. Whilst there are clearly some differences between the Nythe Road application and the proposed development at Rode, both sites are in tranquil areas, and both are in the Mendip Landscape Character Area. These two reasons for refusal are therefore directly relevant for the Rode application:

- The proposed development would be located in a tranquil area and the noise emissions associated with the proposed development would be contrary to DP8 of the Mendip District Local Plan.....
- The proposed development is not compatible with the pattern of natural and man-made features of the Landscape Character Areas and **would, individually and cumulatively significantly degrade the quality of the local landscape and would have a significant adverse impact on local landscape character**. Furthermore, the development proposals would not contribute positively to the maintenance and enhancement of local character, identity and distinctiveness. **The proposed development is therefore contrary to policies DP1 and DP4 of the Mendip District Local Plan....** The proposed development would not protect or enhance a valued landscape, because the introduction a significant number of new solar panels would bring further change to the visual characteristics of the area, and this is considered to result in harm to its character. **On this basis the proposed development would therefore be contrary to NPPF paragraph 180.**

Conclusion

Rode Parish Council therefore continues to object to this application, for the following reasons:

- Scale. This proposed scheme would be the second largest Solar Farm in Somerset, and one of the largest in the UK. The scale is very, very significant – the footprint of the development is over two and a half times the footprint of the village, and would result in an area equivalent to more than 100 football pitches being covered in black metal structures, right up to the edge of the village. The applicant has made no meaningful attempt to address the issue of scale, despite the concerns of the Planning Committee;
- Rode is one of the jewels in the crown of Somerset's heritage – it has an extraordinarily rich history, and therefore it should be very important to preserve the setting of the village.
- 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.
- A recent exercise carried out by Somerset Council concluded that six 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. It would seem perverse if the Council subsequently concluded that such a large development, in such close proximity to the village, is actually suitable;
- The very recent research published by Friends of the Earth demonstrates that there is huge potential for solar power generation in England on land which is NOT in close proximity to heritage assets.
- The research undertaken by Friends of the Earth was detailed, and identified further land in proximity to the proposed site, but further away from the village and its heritage assets, which would be suitable. This clearly demonstrates that there is no requirement to develop the land closest to the village in order to deliver a significant renewable energy project.
- Key consultees such as the Conservation Officer, Historic England, and the Landscape Officer have either objected to the application or highlighted significant concerns. CPRE has also objected strongly to the application. Historic England has significant concerns regarding the impact the development would have on the open rural landscape. The Conservation Officer states that the mitigation measures do little to overcome the negative impact the application will have on the surrounding designated heritage assets and "are a poor attempt to overcome this level of harm". The Landscape Officer states that "the proposed development will have a significant impact on this rural, agricultural landscape".
- There were 60 separate local objections, and only four comments in favour. This is a significant level of local objection which needs to be considered very carefully by the Committee, given the level of impact this proposal would have on the village.
- The planning balance outlined in the officer's initial report is very fine, and is obviously a matter of judgment. This judgment does not take account of the fact that the harm to both Landscape and Heritage will last for at least 40 years, whilst the benefit accorded to Renewable Energy Generation can be achieved with some moderate

amendments to the scheme, and therefore avoid the significant harms which the council officers acknowledge.

- The recent Written Ministerial Statement highlights the heightened levels of governmental concern regarding the use of Best & Most Versatile land for solar farms, and draws further attention to the quality of soil surveys and the cumulative impact of solar farms in close proximity.
- The applicant has been unwilling to engage with local residents, despite the high levels of local opposition to the scheme. The Parish Council very much regrets this approach – especially given the potential for a compromise solution to be reached.
- The revised access route appears not to be supported by the landowner concerned. Local residents have made complaints to the police that the landowner has used intimidation and blackmail in an attempt to persuade them to agree to the original access route. There must, therefore, be concerns that the revised access route is not deliverable. Furthermore, the original access route would continue to be used for Emergency Vehicle access, which appears contrary to the guidance provided by Devon & Somerset Fire & Rescue.

Rode Parish Council managed to secure a meeting with the applicant, but only AFTER their latest revisions were submitted. The PC put forward some proposals for removal of some of the areas closest to the village. The applicant has undertaken to look at these proposals, and also to examine the potential to use some of the land further from the village identified in the Friends of the Earth research. It is unfortunate that the applicant did not engage with the PC before the latest revisions were finalised – and therefore Rode Parish Council believes this latest submission by the applicant represents a huge missed opportunity.

In summary, Rode Parish Council believes an alternative scheme can relatively simply be developed which achieves the following:

- **A development of significant scale, but appropriately sized for its location and proximity to the village, with minimal negative impact on the landscape and heritage assets;**
- **A development which excludes the use of any BMV agricultural land, and other proximate land which clearly supports vigorous and healthy crops;**
- **A development with a permanent access route, supported by local residents and landowners, which meets the requirements of Devon & Somerset Fire & Rescue;**
- **A development which still provides a meaningful contribution to carbon reduction.**

We strongly urge the Planning Committee to reject (or further defer) the application, to allow time for the applicant to fully engage with the local community and develop a scheme which can be supported by all. Whilst this may take a little more time, the current scheme – with its obvious drawbacks – would be in situ for 40 years. A few more months to arrive at a much improved scheme is a small price to pay in that context.

Rode Parish Council, 17th June 2024