

ANNEX A – Initial Conservation Consultation Response - Landscape

TO: Alex Skidmore
FROM: Robert Archer
DATE: 30 October 2014

APPLICATION: 14/04300 - Land at Aller Court Farm, Aller

Alex, I have read through the material submitted in support of the above application, which seeks consent for a solar array over a 26.6ha area, on land to the northwest of Aller Court Farm, in the parish of Aller and circa 0.5km from the village edge. I am also familiar with the site and its wider landscape context, and have visited the key vantage points.

National planning policy supports the development of renewable energy projects, providing there is no unacceptable adverse impact upon the landscape, though there has recently been a shift in emphasis away from large-scale farmland solar. Recent appeal decisions relating to PV array within the district have placed the emphasis upon containment of the visual profile of solar sites when positively determining the appeals. Consequently I consider that the prime landscape concerns will be;

- 1) the impact upon landscape character, particularly relative to the scale and pattern of the local landscape;
- 2) the potential visibility of the proposal, especially as viewed from sensitive receptors;
- 3) the potential for cumulative impacts to arise, and;
- 4) achieving a site layout and design that is landscape-sympathetic.

This application includes a detailed landscape and visual impact assessment (LVIA) which considers the extent of likely impacts upon the surrounding landscape that may arise from the installation of this proposal. Looking at the proposal before us, with that evaluation to hand, I would comment;

(1) The application site lays over relatively level ground across the floor of Aller Moor, its general level circa 4-6m aod, rising a further 3-4m. toward the west boundary of the site, which faces the raised 'island' of Aller Court, 0.5km to the southeast. Extending over land that is primarily in arable use, much of the site is typical of the low elevation; general scale, and openness that characterises the moor landscape, though it lacks the rectilinear, rhyme-lined definition of a number of the surrounding fields. It is bounded by hedgerows and poplar/willow lines to the north, whilst is primarily open to the south. Both the plantation trees and hedges offer a degree of enclosure to north and northwest, and this is noted by the L&VIA as usefully providing screening of the site in this quarter.

It is apparent that the proposal does not disrupt the landscape fabric, nor is it markedly at variance with the expressed pattern of the landscape. The landscape components within and defining the site will remain in evidence. Also to advantage is the east-west emphasis of the array, which enables a simplified layout to be achieved; and the general scale of the moorland, and its relatively flat topography, which allows the array to sit within the general low elevation of the moorland. Whilst the ground rises marginally to the east, this falls short of the 'head' of the raised island of Aller Court. I also note that an array is a passive element in the landscape, generating neither sound nor movement. I view these elements of the proposal as positive.

Conversely, it is acknowledged that PV panel forms within security fencing can be viewed as being 'industrial' in character. Such character is at variance with this landscape setting, which has an emphatic sense of rural character as expressed by the open moorland; the rectilinear rhyme network; its mixed farmland; and a low-level of development presence. The few development features that are found within the locality are of domestic scale, along with two local farmsteads, hence there is a clear incongruity of development scale when considered alongside this 26 ha. proposal, and it is clear that the development proposal is at variance with the open; little-developed & rural character of the

moorland. This issue is particularly significant if that incongruity of character has too great a visual profile.

(2) Turning to visual impact, whilst the site does not benefit from visual containment to all sides, it is apparent that the low level of much of the surrounding landscape and intervening willow/hedge lines will act to filter many of the low-trajectory views toward the site. Other than from Aller Drove and its associated properties, there are few close public viewpoints onto the site. Locations with a view over the site are primarily restricted to the rising ground of Aller's north edge and Aller Hill, and potentially at greater distance from properties and regional trails to the west and north, in the vicinity of Stathe and Othery.

The LVIA offers a detailed visual appraisal utilising 22 representative vantage points, each evaluating the potential visual impact before and following mitigation (table 2). Whilst it finds that many distant, and low-trajectory vantage points do not have a clear prospect of the site, it concludes there to be a number of receptors where the visual impact of array development will initially be 'moderate adverse' and these are;

- (a) A 100m length of the PROW on Aller Hill, and adjacent properties on the hillside;
- (b) Aller Drove and associated properties;
- (c) Burrow Mump, and;
- (d) The Parrett Trail, between Oath and Stathe, and some adjacent properties.

The LVIA proposes mitigation planting - primarily of additional tree and hedge lines using species consistent with local character; plus appropriate management of existing hedgerows and shelterbelts - and suggests that this will counter the initial visual impacts once effective. With this mitigation, the potential for adverse impact will be reduced to minor significance only, other than from Aller Hill.

I have reviewed the findings of the visual assessment, with which I concur in most part. I am satisfied that the visual assessment of the array from the prime public receptors of Burrow Mump and the Parrett Trail is objective, and I agree the proposal does not unduly impact upon the setting of Burrow Mump, nor that of Aller Court and Church. However, I think it is likely that there will be a number of properties on the sides of Aller Hill whose prime prospect of the moor will now include the array, where the impact will remain moderate adverse, and whilst I agree that there is some potential to minimise prospect of the array's eastern end from Aller Drove and its properties with planting, I am also mindful that this prospect is at close quarter, and slightly dominant relative to these receptors, such that I consider the impact to remain moderate adverse.

(3) Relative to potential cumulative impact, I am not aware of any sizeable PV arrays within Taunton Deane and Sedgemoor Districts that lay within close proximity of the site. A Planning Inspector's decision has recently favoured a site for PV to the east of Langport, circa 6 km from this application site. However, there is no vantage point that perceives both sites; they are separated by the development mass of Langport/Huish Episcopi; and are located within in separate landscape types, to thus avoid additional footprint within a shared landscape. Given this topographic and visual separation of the sites, it is not anticipated that cumulative impact will be an issue with this application.

(4) Turning to site detail, I note that the array will stand approx. 2.4 metres above ground level. This height is such that it is not dominant of hedgerow enclosure where it exists, but within a low, flat landscape, its profile will be heightened. No site-levelling works are intended, and PV mounting is limited to a fixed racking system with its toes driven into the ground without need for concrete. A 2.2 metre tall fence of reinforced wire mesh, along with thermal imaging cameras (but no lighting) provides site security. Inverter structures are located within the array layout, and are to be finished in suitable dull tones to thus minimise visual impact. The field surface will be seeded as grassland, to be managed either by a hay-cut or grazing. Whilst I have concerns over the array's height, I am satisfied that other details of the PV installation can be accommodated without undue impact upon the fabric of the site.

Looking at the application overall, it is clear that there are both positive and negative elements to the proposal. Whilst the scale of the proposal is not at variance with the moor's breadth, it is the

character impact of a PV installation upon an open; undeveloped tract of low-laying land, where the drainage and farm management has created a landscape that is nationally renowned, which will be both incongruous and adverse. However, Government guidance has concerned itself primarily with visibility, and in this respect, the site does not have a high visual profile, other than in relation to dwellings on raised ground at Aller's north edge; on the sides of Aller Hill; and along Aller Drove, where a substantive visual impact will occur.

National planning guidance remains weighted in favour of renewables, and LPAs have been urged to approve renewable energy schemes providing impacts can be made acceptable. This proposal clearly will have adverse landscape-character and local visual impact, but this is finely-balanced in relation to the national planning weight favouring renewables. However, there have recently been government changes to solar strategy, where;

- (a) a ministerial letter from the DECC to LPAs in relation to the UK Solar Strategy (Nov 2013) emphasised that "Support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity, and provide opportunities for local communities to influence decisions that affect them";
- (b) The updated Renewable & low carbon energy PPG of March 2014 emphasised that in relation to 'solar farms', visual impact is a particular factor for consideration. It changed para 13 of the PPG, to encourage large-scale solar farms on 'non-agricultural land' as well as previously developed land, and;
- (c) A DECC letter to LPAs April 2014 relating to the UK Solar PV Strategy Part 2 stated the main message to be a focus of growth of solar PV in the UK on domestic and commercial roof space and on previously-used land. Whilst it states there remains a place for larger-scale field-based solar, such new solar installations are to be sensitively placed.

With this shift of emphasis, I believe that the local landscape impacts can now be given sufficient weight to tell against this application. From a landscape standpoint, the proposal clearly does not respect the 'form, character and setting' of the moors landscape, contrary to the requirements of LP policy ST5 para 4, neither in its current form does it satisfy LP policy EC3. There may be scope for a reduction in the scale of the array, to draw it further from Aller's edge, but this would need to be a substantial reduction, and with further and substantive planting mitigation.

Robert Archer
Landscape Architect

e-mail: robert.archer@southsomerset.gov.uk

File: renewable/pvs/apps/aller2014-10