

This representation is made in relation to the planning application at South Hill Farm, Bridgwater Road, Bleadon, BS24 0AL (ref. **13/P/0854/F2**), for the siting of solar photovoltaic (PV) arrays and ancillary development.

Representation

There is inadequate information in the application, and the landscape and visual impacts of the proposed development would not comply with Core Strategy policy CS5. The application should therefore be refused.

Reasons:

1. Information is lacking on the location of the 10no. 6m high CCTV cameras, and the 7m high "Meteo data sensor column". These will be highly visible features in the landscape rising above the surrounding hedgerows, and their siting would be key in determining the impact of the development.
2. The position of the fence line is also missing from the drawings, and details of any security gates and the access (width, surfacing, boundary treatments) are not provided. These features will be open to public view, and cumulatively can significantly erode the rural character of the area.
3. Despite reference to landscape proposals in the Landscape and Visual Impact Assessment (LVIA) and design and access statement, no proposals are included with the application. The conclusions of the LVIA should therefore be questioned.
4. The scope, content and conclusions of the LVIA are considered to be inadequate, incorrect, and misleading in parts (discussed in greater detail below).

Criticisms of the submitted Landscape and Visual Impact Assessment (LVIA)

Scope of the LVIA

Mendip Hills Area of Outstanding Natural Beauty (AONB)

- 1.1. The following statement was made by the Mendip Hills AONB Unit in response to the EIA Screening request for this development:

Whilst the solar park would be just outside the AONB, its close proximity raises concerns over its possible impact on the special qualities of the designated landscape, particularly views from hillsides around Bleadon and impact on wildlife. The AONB's Planning Liaison Officer said 'Such views out of the AONB to surrounding countryside are an essential quality of the protected landscape. Solar parks are a relatively new innovation in the UK and the AONB Unit feels that their environmental impact needs to be fully assessed which, given the significant scale of the proposal near Bleadon, is why we have advised North Somerset Council that an EIA should be requested.'

- 1.2. The issues raised above are not considered to be satisfactorily addressed in the LVIA, with one assessed view from a footpath where the site is obscured by topography (Viewpoint 3) not rigorously demonstrating that there will be no impact on the special qualities of the AONB designation.

Methodology

- 1.3. The LVIA methodology sets out appropriate sections in accordance with the specified guidance, but fails to carry them forward into the assessment text. A key example being:

5.3.6. *In order to understand how a development will affect the landscape, it is necessary to consider the different aspects of a landscape resource.*

This assessment takes into account:

- *Direct effects of the works upon individual elements that make up the landscape as well as indirect effects of the associated development;*
- *The subtle effects that contribute towards the intangible characteristics of these elements or combinations of elements such as tranquillity, wildness and cultural associations;*
- *Change in the character of the landscape, the distinct and recognisable pattern of elements that occur consistently to create a sense of place.*

- 1.4. The first bullet point is addressed in Table 5.11, but the further two factors which together greatly contribute to the distinctive character of the area recognised in policy, are not discussed until the conclusion and are dismissed with short statements:

5.4.24. There will be negligible beneficial impacts upon landscape pattern due to the retention and enhancement of all boundary features on site such as hedges and ditches that are so typical of the levels landscape. [note that no landscape enhancement is actually proposed]

5.4.25. The significance of landscape effects that are likely to arise as a result of the proposed development is slight adverse.

Landscape Assessment

- 1.5. Further to the issue described above, in the assessment of impacts the landscape assessment should refer to the key landscape characteristics of the area as set out in the North Somerset District Landscape Character Assessment, notably:

- Mixed pastoral and arable land use;
- Regular fields pattern, medium in size in the heart of Bleadon Moor, with larger geometric fields to the east and around the margins of the Moor;
- Hedgerows intermittent with sparse hedgerow trees in the west of the area, to the east more complete with variety of hedgerow species including willows, oak, elm and ash;
- Network of drainage channels, ditches and rhynes in evidence but not visually dominant due to growth of scrub along smaller channels forming gappy hedgerows; and
- The strong sense of place provided by the steep sided upland areas that tower above the flat farmland on the levels with the high number of drainage ditches.

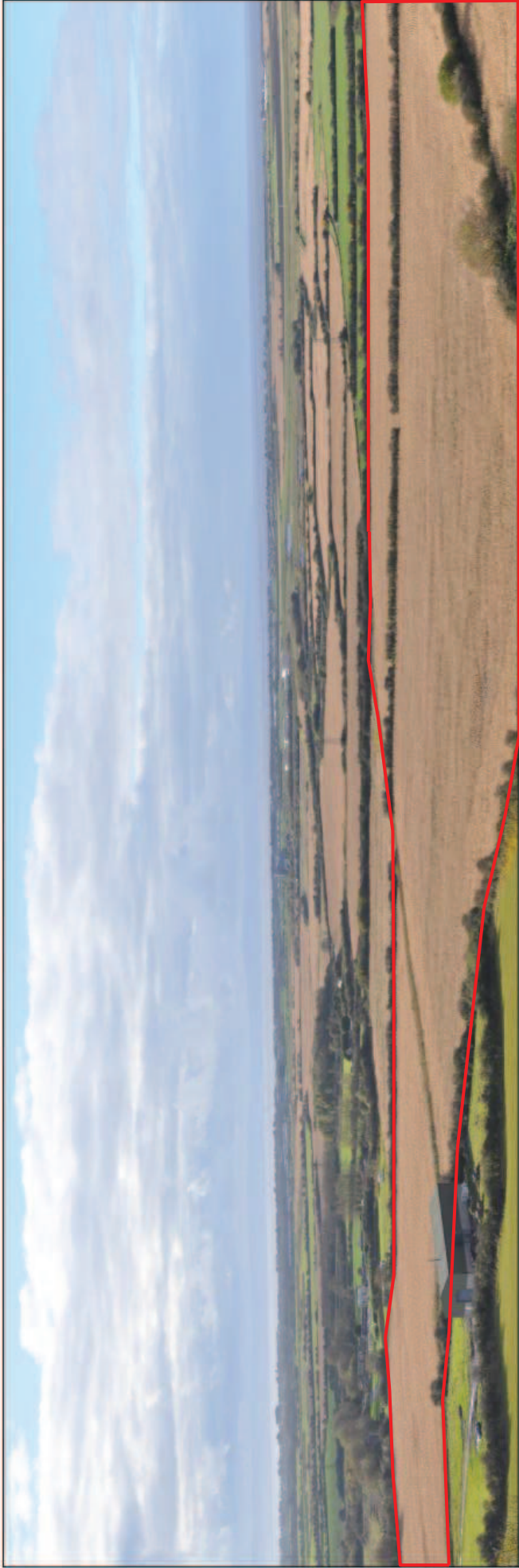
- 1.6. It is suggested that despite retaining various landscape elements, the intrinsic landscape character of the area as described above would be significantly eroded by the proposed development; the pattern of arable and pastoral fields bordered by hedgerows and riparian vegetation being replaced with development of an industrial scale and character. An important landscape characteristic also not noted in the assessment are the locally distinctive views from the elevated hills of the Mendips over the levels, which form a special quality of the Mendip Hills AONB.

- 1.7. In light of the above, it is suggested that a more significant impact would result from the development than the **slight adverse** predicted.

- 1.8. The assessment appears to give significant weight to the presence of urbanising influences including overhead pylons, caravan parks and industrial development, but rather than a factor justifying further degradation of the landscape, these features should be assessed as part of the cumulative impact assessment.

Visual Assessment

- 1.9. As above, weight is given to the negative landscape features in the local landscape. It is contested that rather than justify further visually intrusive development in this area, they should be assessed in a cumulative visual assessment.
- 1.10. The comparison of the proposed development to other water/wet mud elements in the levels landscape is not considered to be appropriate; rivers, streams, floodplains, the river channel and other naturalistic features would differ significantly from the rectilinear nature of development within the site, and the regular rows of repeating panels. Large scale solar parks appear as extensive and incongruous man-made development features in a landscape setting, particularly from elevated viewpoints such as the area around Viewpoint 4.
- 1.11. Whilst the range of viewpoints in the assessment covers a number of key views, it is suggested that clearer views are likely from Hellenge Hill and the Mendip Hills AONB, than the selected viewpoint in which the site is almost completely obscured by Purn Hill. Viewpoint 5 also does not represent the gappy nature of the hedgerow bordering the southern boundary of the site. Additionally, the number of representations submitted by local residents with views overlooking the site suggests that the small number of residential properties affected by the proposals identified in the LVIA underestimates the impact of the development on the resident population.
- 1.12. There do not appear to be any photomontages actually included within the report (or at least not available online), only the panorama photographs from identified locations. Without photomontages or at least the site boundary identified on the photographs, the descriptions included in the report text do not sufficiently describe the visual presence of the development. For example, the impact on viewpoint 4 would be clearer if the site boundary were superimposed on the photograph, with the extents of the site stretching beyond the wide field of view present in the image. This would more clearly depict the extent to which the proposed development would dominate the view (see below).



Viewpoint 4 showing the extents of the proposed development site.

Cumulative Impact and Detrimental Features

- 1.13. The cumulative impact assessments within both the landscape and visual sections fail to recognise the potential for cumulative impact with existing features that are at odds with the distinctive characteristics and landscape quality of the area. It is noted throughout the LVIA that these features detract from the character of the area, and introduce clutter into the view. The summary of visual impacts states that:

The high level of existing clutter and visual disturbance in the rural views coupled with the short duration of many of the receptors means that views from the elevated locations are already heavily disturbed. (5.5.49)

- 1.14. It is contested that the section on Cumulative Impact should therefore assess the degree to which the proposed development would further detract from the character and views of the area, rather than focus on approved and similar developments locally.
- 1.15. Notwithstanding the above, in reviewing the photographs of the viewpoints submitted the following statements do not appear to accurately represent the visual quality of the area, which is has a consistently rural character and appearance, dominated by the field and landscape pattern:

"...high level of declining landscape features such as holiday parks, caravan parks and disused farm buildings. The Mendips Model Racing Club and track add further disturbance to the area that is enhanced by the railway line and the frequent passage of trains through the levels." (5.4.3)

"A line of pylons and overhead power lines add further discordance to the rural landscape with the sewage works on the Bleadon Levels forming a prominent feature that further degrades landscape character." (5.4.4)

and

"...high level of visual disturbance that is provided by holiday parks, pylons and industrial scale buildings such as those at the sewage plant." (5.5.49)

- 1.16. It is suggested that this attempt to justify this site for solar development is exaggerated and incorrectly applied.

Mitigation

- 1.17. The mitigation section of the report includes proposals for "*Planting new hedges and gapping up existing boundary hedges to reduce visibility of the development from off-site locations*", yet no proposals are included within the application. This fact should result in questioning the conclusions of the LVIA, which clearly considered mitigation planting in reaching the conclusions included in the report.

Conclusions

- 1.18. It is suggested that the following conclusions are incorrectly reached and misleading:

5.7.2. There are a high number of degrading landscape features in the existing landscape as well as a significant number of existing visual detractors that provide the rural area with a declining character and quality of visual baseline.

- 1.19. Rather than providing justification for large scale industrial development, the existing presence of degrading features and declining character and appearance of the area (if

indeed this is an issue at this particular site ref. para 1.15. above) should result in the consideration of the impact of further degrading the character and views of the local landscape.

5.7.3. The proposed development sits in accordance with all local and national planning policy due to the lack of impact that it will cause to the Mendip Hills AONB and the reversibility of the development at the end of its 35 year life span. The Mendip Hills AONB management plan promotes sustainable forms of economic development that conserve and enhance the environment.

- 1.20. Even if there were no impact on the Mendip Hills AONB (which is not sufficiently addressed in the report), national and local policy also protects the intrinsic character of the landscape outside of the AONB designation. The above statement is therefore lacking application and understanding of the policy context.

Requested Planning Conditions

It is considered that the proposals should be rejected, however, if the Local Planning Authority is minded to grant approval, it is suggested that the following landscape conditions should be imposed on the development which would mitigate some of the more harmful visual impacts of the proposals:

- *A scheme of planting agreed with the planning authority prior to commencing any works on site, and implemented in the first available planting season to mitigate local impacts of the proposals and to enhance the landscape character of the area.*
- *The strict retention of all new and existing vegetation and landscape features on site for the duration of the permission.*
- *A landscape management plan agreed with the planning authority prior to commencing any work on site including for the management of the grassland within the fenced areas, the creation of species rich grassland, and the management of existing hedgerows including altering current maintenance regime such that hedgerows are managed at a minimum height of 3-4m high for the duration of the development.*
- *Specific, enforceable proposals for the removal of all panels, fencing, cameras, tracks and associated infrastructure and the return to agricultural fields a maximum of 35 years from the date of approval, and that sufficient funding is set aside to ensure that this is carried out.*

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