



The countryside charity
North Yorkshire

PO Box 189
York
YO7 9BL

www.cprenorthyorkshire.co.uk

Tel: 07983 088120
Email: info@cprenorthyorkshire.co.uk

Branch Chair
Mrs J Arger

Authority: Richmondshire District Council

Type of consultation: Planning Application

Full details of application/consultation: 21/00931/FULL | Full Planning Permission for Proposed Solar Farm and Ancillary Development

At land at: Land Southeast of A6108, Darlington Road, Richmond, North Yorkshire, DL10 7ED

Type of response: Objection

Date of Submission: 31st January 2022

All responses or queries relating to this submission should be directed to the Secretary for the Trustees at the contact details shown above on this frontispiece.

All CPRE North Yorkshire comments are prepared by the charity using professional planners whose research and recommendations form the basis of this response in line with national CPRE policies.

External planning consultant used in this response:



KVA Planning Consultancy
Katie Atkinson, BA (Hons), Dip TP, MA
MRTPI
www.kvaplaning.co.uk

Comment

The North Yorkshire County branch of CPRE 'The Countryside Charity' ('CPRENY') welcomes the opportunity to comment on the proposal for full planning permission for proposed solar farm and ancillary development on two parcels of land, herein referred to as the 'western parcel' and the 'eastern parcel', with a combined area of approximately 69.5ha (western parcel is 46ha, eastern parcel is 23.5ha). The site is located on agricultural land to the southeast of the A6108 Darlington Road, Skeeby.

Planning Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application should be determined in accordance with the development plan unless material planning considerations indicate otherwise. The planning system should contribute to achieving sustainable development. The National Planning Policy Framework (NPPF) (2021) aims to deliver sustainable development through the implementation of its policies. Paragraph 11 states that for decision making this means:

- c) 'approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - I. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - II. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*

Paragraph 219 of the NPPF clarifies that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the Framework. Weight should be given to them according to their consistency with the NPPF. (The closer the policies in the plan to the policies in the Framework, the greater the weight that should be attributed).

The Development Plan relevant to this application consists of:

- The Richmondshire Local Plan 2012-28 Core Strategy (2014); and
- Saved Policy 23 of the Richmondshire Local Plan 1999-2006.

Richmondshire District Council (RDC) have recently commenced a review of the Local Plan to update policies for new development. The Issues and Options Consultation was undertaken in 2018 and CPRENY commented at that time. The Preferred Options Consultation was published in July 2021 to which CPRENY responded in full. However, due to the early stages of plan preparation, no weight can be attached to this document as yet and as such full weight should be given to the saved Local Plan policies and other material considerations as necessary including the NPPF.

CPRENY do not object to the generation of renewable energy by solar arrays and consider that the generation and supply of low carbon energy will be core to achieving the UK goal of net zero carbon emissions by 2050 or earlier. This will require a transformation of our energy system over the next 20–30 years. The scale and immediacy of the threat to the climate and our countryside means that change is necessary.

The current model of renewable energy development has resulted in some poor outcomes for landscapes, the environment and rural communities. CPRENY wants to change this and believes it is possible to achieve the net-zero transition, including the introduction of new solar developments, in harmony with our wider environmental and social objectives.

This means taking a strategic planning approach to development of renewable energy assets at the local level and ensuring that local communities are empowered to help shape their local energy response. CPRENY will, therefore, only support solar developments which:

- minimise impacts on landscapes, tranquility and heritage, through appropriately scaled development;
- minimise the impacts on the Best and Most Versatile agricultural land;
- bring net benefits to biodiversity;
- benefit the rural economy; and
- are supported or owned by local communities.

Furthermore, CPRENY consider that renewable energy generation and climate change mitigation must be maximised within urban areas and priority given to using previously developed land in line with CPREs 'brownfield first' policy.

The proposal subject to consideration on two parcels of arable land are not, therefore, in line with a brownfield first approach. Indeed, the site is located in the open countryside within Richmondshire District between Richmond and Skeeby.

Policy CP2 of the Local Plan (LP) supports renewable energy developments stating that they '*must address landscape and visual impact on the local community.*' Policy CP3 takes this approach further requiring development to '*promote the character and quality of the local landscape [...] and the distinctive character of townscape and setting of settlements.*' Policy CP4 sets out that development should be of '*an appropriate scale and nature and not impact adversely on the character of a settlement or landscape*' and Policy CP8 sets out that development must not conflict with '*landscape character, amenity and development.*'

CPRENY are concerned about the impact on the landscape at these 2 locations because of the proposed development, particularly the setting of the settlement of Richmond which is an important gateway to the Yorkshire Dales National Park.

The solar panels will be ground mounted, alongside a deer-proof security fence, ancillary buildings, infrastructure, and numerous CCTV poles which will be implemented along the boundary of both sites and sited adjacent to screening planting (and gapping up) of hedgerows – to be maintained at a minimum of 3m in height. The applicants own LVIA admits that it will have a high degree of visual impact on the surrounding area which, with mitigation, will reduce to a medium impact between 5-10 years - if all goes well. However, the northern boundary of the western array, immediately adjacent to Darlington Road (A6108) will be particularly difficult to screen. The topography of the land at this location, does not aid the visual screening of the site. CPRENY consider that the visual impact, particularly of the proposed western array on approach to Richmond along the A6108, is so detrimental, even with the proposed mitigation, that it should be refused as contrary to local plan policy.

Furthermore, the emerging Local Plan sets out a preferred vision for Richmond which states clearly that the villages and countryside beyond Richmond such '*continue to retain their high quality and character.*' The large greenfield sites are considered to be of part of this high-quality character, forming the important setting of the town – they are large, open and undeveloped arable fields. It is considered that approving development at the proposed location of such scale, will detrimentally impact the important setting of the town – known as a Gateway to the Yorkshire Dales National Park.

The impact on users of the surrounding Public Rights of Way (PROW) network will be high. The PROWs in this area are reported to be popular routes with residents and visitors to the area alike using them frequently as a means to access the countryside. CPRENY are especially concerned about the impact on amenity for users as a

result of the proposed 3m high hedging along the boundaries of the PROWs which are routed through the western array which will in effect create a 'tunnel.' – It is widely known that users of PROWs can be deterred from using such paths as a result of feeling unsafe without open views and as such, CPRENY oppose the development.

Conclusion

CPRENY welcomes the opportunity to comment on this detailed planning application for a large solar array between Richmond and Skeeby.

CPRENY recognise the need to transition away from fossil fuels towards a renewable and clean energy generation mix, including solar, to achieve net-zero emissions by 2050 or earlier. In some circumstances it is recognised that ground mounted solar arrays can be well screened and mitigated appropriately. However, CPRENY do not consider that large-scale solar farms are appropriate in the open countryside on greenfield sites, especially where they detract from the important landscape character and rural setting of a settlement. In this case, CPRENY object to the substantial solar arrays promoted by the applicant, in particular, the western most array and consider that the proposed development is contrary to local plan policy for the reasons set out above.

CPRENY reserves the right to comment further should any additional information be submitted in support of the proposal.