

Date: 28th February 2022
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Our ref: 21/0155/PREAPP



Ms Sharon Queeney
Enzygo
Stag House
The Chipping
Wotton Under Edge
GL12 7AD

Dear Ms Queeney

Re: Construction of a 30-35 MW Solar Farm, on land at Marsh Green, Marsh Green

I write on behalf of the Western Planning Team in response to your pre-application enquiry for the construction of a solar farm on land at Marsh Green in Marsh Green.

The proposed site lies within a low lying, gently undulating rural area south of the village of Rockbere and the A30. The predominant land-use is agricultural with scattered isolated farms and small settlements. The site itself is predominantly grazing land with traditional hedgerows and numerous mature trees, predominantly oak, both within hedge-lines and as solitary specimens or small groups within fields. The proposed solar farm would extend to 87Ha with 30-35MWp generating capacity covering a number of fields within the vicinity of Marsh Green, a small hamlet of residential dwellings to the north east. The land is undulating, and includes some areas designated as flood zones by the Environment Agency. A public footpath runs through a parcel of land to the south west. There are some residential dwellings in close proximity to the site, which include a number of grade II listed buildings and an important cluster at Rockbeare Manor, which includes the grade I listed house, the grade II* listed stable and numerous other grade II* and grade II listed buildings as well as the grade II registered park and garden that covers the site.

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The Council's mapping data indicates that the land to which this enquiry relates is classified as grade 3 agricultural land.

Having carried out a site visit and discussed the enquiry as a team with the benefit of consultation responses from key consultees, we consider the main issues to be:

Policy Context:

The National Planning Policy Framework (NPPF) states that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Council formally adopted the East Devon Local Plan 2013-2031 on 28th January 2016 and the policies contained within it are those against which applications are being determined and carry full weight.

The site falls within the parish of Rockbeare which has a 'made' Neighbourhood Plan area where the policies within the NP carry full weight alongside the East Devon Local Plan.

Principle of Development:

In planning terms, the site is located in the open countryside, as it is not within a built-up area boundary as defined by the East Devon Local Plan (referred to as the EDLP for the remainder of this letter). Development outside of built-up area boundaries falls to be considered under the provisions of Strategy 7- Development in the Countryside of the EDLP which states the following:

The countryside is defined as all those parts of the plan area that are outside the Built-up Area Boundaries and outside of site specific allocations shown on the Proposals Map. Development in the countryside will only be permitted where it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development and where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located, including:

- 1. Land form and patterns of settlement.*
-

2. Important natural and manmade features which contribute to the local landscape character, including topography, traditional field boundaries, areas of importance for nature conservation and rural buildings.

3. The adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions.

The principle of development is however supported by Strategy 39- Renewable and Low Carbon Energy Projects of the Local Plan which states:

Renewable or low-carbon energy projects in either domestic or commercial development will in principle be supported and encouraged subject to them following current best practice guidance and the adverse impacts on features of environmental and heritage sensitivity, including any cumulative landscape and visual impacts, being satisfactorily addressed. Applicants will need to demonstrate that they have;

1. taken appropriate steps in considering the options in relation to location, scale and design, for firstly avoiding harm;

2. and then reducing and mitigating any unavoidable harm, to ensure an acceptable balance between harm and benefit.

Where schemes are in open countryside there will be a requirement to remove all equipment from the site and restore land to its former, or better, condition if the project ceases in the future. Wind turbines will only be permitted where they are in accordance with a Neighborhood Plan or Development Plan Document.

Strategy 39 of the Local Plan supports in principle renewable or low carbon energy projects subject to them following current best practice guidance and the adverse impacts on features of environmental and heritage sensitivity, including any cumulative landscape and visual impacts being satisfactorily addressed. There are no specific renewable energy policies within the Rockbeare Neighbourhood Plan.

Landscape and Visual Impact:

Whilst the application site is located in open countryside, it is not the subject of any national or local landscape designations. The proposed site lies within a low lying, gently undulating rural area south of Rockbeare and the A30. The predominant land-use is agricultural with scattered isolated farms and small settlements. The site itself is predominantly grazing land with traditional hedgerows and numerous mature trees, predominantly oak, both within hedge-lines and as solitary specimens or small groups within fields. The proposed solar farm would extend to 87Ha with 30-35MWp generating capacity. Devon Landscape Policy Group Advice Note 2: Accommodating Wind and Solar PV Developments in Devon's Landscape categorises the scale of solar farms from very small (<1Ha) to very large (>15Ha) and the proposed development would therefore fall into the very large (largest) category.

We are aware that the Council's Landscape Officer has been liaising with your clients landscape consultant and has been advising on key viewpoints to aid the preparation a full landscape and visual assessment that will be required and prepared in accordance with Guidelines for Landscape Visual Impact Assessment, 3 edition, Landscape Institute/Institute of Environmental Management, 2013 and with reference to DLPG Advice Note 2.

The Council's Landscape Officer has advised that the LVIA should provide a thorough baseline review and consider all likely landscape and visual impacts arising from the development during construction and for the operational phase at years 0, and 15 as well as end of life post-decommissioning. The assessment should take account of noise and lighting impacts.

The assessment should also consider cumulative effects of other nearby solar farms both completed and any current applications or consents for renewable energy schemes not yet implemented.

A full visual assessment should be provided as part of the LVIA and images based on Technical Guidance Note 06/19, Visual Representation, Landscape Institute September 2019.

The selection of viewpoints submitted with this enquiry is generally considered appropriate but two additional viewpoints are identified in the Appendix of the consultation response that has been provided as a separate document. Furthermore, sufficient viewpoints should

be selected along Westcott Lane (Appendix fig. 2) to adequately represent the extent of visibility of the proposed development for walkers travelling along it in both directions.

High resolution photographic images should generally be presented at A3 size and include panoramic views as well as a single shot images with 40 degree field of view for each view point. Photographs should be taken in clear weather conditions between late autumn and early spring when trees and hedgerows are not in leaf.

The location, direction of view, date and time, make and model of camera and sensor format and the make and focal length of lens, horizontal field of view, distance to nearest site boundary and recommended viewing distance of printed image should be included on each image. One copy of the visual assessment should be presented as high resolution printed documents as well as in electronic format.

Photomontages of key views from publicly accessible areas should also be provided showing the proposed scheme at completion and 15 years on. Selection of key view locations should be agreed with the LPA following completion of baseline photography.

The siting and design of the development should reflect guidance provided in DLPG advice note 2, Section 3 – Siting, Design and Assessment of Solar PV Developments. Further advice on required information to accompany any forthcoming planning application in the comprehensive response from the landscape officer which has been provided as a separate document alongside this response.

The Landscape Officer has however identified a number of potential issues to be addressed detailed as:

a) There are already a number of solar schemes constructed or consented to the north and east of Marsh Green. This application seeks to further develop extensive solar generation to the west and south of Marsh Green, which will effectively ring the local community with large scale pv development. While development within much of the core of the site is likely to have limited visual impact from public vantage points, particular care will be required to ensure around the fringes that the visibility of solar arrays from publically accessible roads and viewpoints is limited.

b) In respect of public paths it is noted that Westcott Lane, which runs across the site west of Marsh Green is a county road currently closed due to past flood damage to the carriageway and DCC has no plans to re-open it but, it remains a narrow, historic lane, well used by locals for recreation and affords fairly extensive views across an attractive, deeply rural landscape. The currently proposed extent of solar arrays to either side would significantly alter the character and experience of the landscape to either side. The impact seems likely to be especially felt on the slopes to the west which rise to a north-south running ridge and where development is also likely to be prominent in longer distance views from the east of Marsh Green. The acceptability of their inclusion particularly is questioned. An adequate buffer should also be maintained to either side of Westcott Lane.

There is opportunity as part of the mitigation proposals for the lane to be rededicated as a public bridleway with minor surfacing and drainage works to address safety issues.

c) The inclusion of a community area to the south east of Marsh Green is noted. The application should clearly explain what this will comprise and provide details of any proposed works, how it will be used, managed and funded and who will be responsible for it.

d) The application offers the opportunity to offer further public access that can help to partially compensate for adverse impacts on Watkins Lane and enhance the existing rights of way network – refer Appendix figure 1. It would be especially useful if the existing private metalled track to the south of the County Wildlife Site woodland could be made available as a permissive bridleway.

e) The inclusion of field parcel D1, through which Aylesbeare footpath 7 runs, will have an adverse impact on path users contrary to EDDC local plan policy TC4. It is recommended that this field parcel is omitted from the scheme for this reason.

f) The provision of security fencing and signage could have significant visual impact and could severely restrict wildlife movements. Careful consideration should be given to the design, location and extent of fencing to avoid or mitigate such effects while respecting local landscape character. The use of deer netting rather than welded mesh panels would be preferable in this regard both visually and for its greater permeability to wildlife.

g) Given its rural nature the site is likely to be sensitive to noise particularly those field parcels away from the A30 and due consideration should be given to this.

h) Experience of visiting existing solar sites post-construction indicates that proposed mitigation planting and bio-diversity enhancement measures frequently fail to meet expectations due to poor maintenance and monitoring. Consideration should be given to transferring responsibility for management and maintenance to an accountable body such as parish council, wildlife trust etc. through an appropriate legal agreement.

The above list of potential issues is not necessarily comprehensive and any further adverse impacts that may be identified through the site appraisal and design process should be appropriately considered and mitigated.

To conclude on landscape impact, given the size and scale of the solar farm and associated infrastructure, the impact of the visual impact of the development will form a key part of our assessment of any forthcoming planning application with the benefit of having a full LVIA, landscape and ecological management plan and a final layout. The proposal would result in a significant change to the rural landscape and character and appearance of the area the harm from which would have to be weighed within the overall planning balance against the benefits that would be provided from this significant renewable energy scheme. It is broadly accepted owing to land form and the topography of the site that this landscape impact would be localised in terms of views from surrounding rural roads, through field gates and from public footpaths and not necessarily significantly harmful in terms of its wider landscape impact. It is noted that the solar farm has been reduced in size since the original submission where a number of fields have been removed which includes the field parcel adjacent to the A30 where the parts of the solar farm would be visible, the field parcel with the public footpath and fields to west of rural lane heading out of Marsh Green to the south which would lessen the visual impact from key vantage points to a degree.

Trees:

Policy D3 - Trees and Development Sites of the Local Plan states that permission will only be granted for development, where appropriate tree retention and/or planting is proposed in conjunction with the proposed nearby construction. The council will seek to ensure, subject to detailed design considerations, that there is no net loss in the quality of trees or hedgerows resulting from an approved development. The development should deliver a harmonious and sustainable relationship between structures and trees. The recommendations of British Standard 5837:2012 (or the current revision) will be taken fully into account in addressing development proposals. No building, hard surfacing drainage or underground works will be permitted that does not accord with the principles of BS 5837 or Volume 4 National Joint Utilities Group (NJUG) Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees – Issue 2 (or the current revision or any replacement) unless, exceptionally, the Council is satisfied that such works can be accommodated without harm to the trees concerned or there are overriding reasons for development to proceed. The Council will as a condition of any planning permission granted, require details as to how trees, hedges and hedge banks will be protected prior to and during and after construction. The Council will protect existing trees and trees planted in accordance with approved landscaping schemes through the making of Tree Preservation Orders where appropriate or necessary. Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

There a large number of mature trees within the fields which we are understand are not going to be removed as a result of the development which is welcomed as they contribute positively to the rural character and landscape of the area. The layout of the solar farm must be informed by the above and below ground constraints of the retained trees and hedgerows and we would expect any forthcoming planning application to be accompanied by a full BS 5837 survey and impact assessment.

Ecology:

Policy EN5 - Wildlife Habitats and Features of the Local Plan states that wherever possible sites supporting important wildlife habitats or features not otherwise protected by policies will be protected from development proposals which would result in the loss of or damage to their nature conservation value, particularly where these form a link between or buffer to designated wildlife sites. Where potential arises positive opportunities for habitat creation will be encouraged through the development process. Where development is permitted on such sites mitigation will be required to reduce the negative impacts and where this is not possible adequate compensatory habitat enhancement or creation schemes will be required and/or measures required to be taken to ensure that the impacts of the development on valued natural features and wildlife have been mitigated to their fullest practical extent.

It is noted from the pre-application submission and subsequent meeting that a significant amount of ecology work has already been undertaken to inform proposals which enhance biodiversity in the area which includes an area of woodland planting adjacent to a County Wildlife site Ancient Woodland. Ecological enhancements and biodiversity gain would weigh in favour of any forthcoming planning application within the overall planning balance and should come forward in the form of a Landscape and Ecological Management Plan which sets out a detailed landscape and ecological enhancements that would be provided as part of the scheme.

Highways:

Policy TC7 - Adequacy of Road Network and Site Access of the Local Plan states that planning permission for new development will not be granted if the proposed access, or the traffic generated by the development, would be detrimental to the safe and satisfactory operation of the local, or wider, highway network. Where new development requires off-site highway improvements any planning permission granted will be subject to a planning obligation requiring these works to be carried out either by the developer, or through an agreement with the Highway Authority to ensure that:

- 1. The required highway improvements are included in, and, will be constructed as an integral part of the development or are part of a programmed improvement scheme to be undertaken by the Highway Authority. In the case of programmed schemes the planning*

permission will be subject to a condition delaying its implementation until the highway improvements have been carried out, unless otherwise agreed by the Highway Authority.

2. The applicant is in a position to secure the implementation of the required highway improvements.

The northern and western boundaries of the site are located immediately adjacent to the A30 trunk road boundary and therefore the views of National Highways have been sought:

Traffic Impact

An assessment of the predicted transport impact of the proposal on the strategic road network during the construction and operational phases. This should provide the number of predicted daily vehicular movements (and vehicle types) including during the AM (0800-0900) and PM (1700-1800) network peaks.

A Construction Management Plan detailing type and number of vehicles and duration of construction period, construction vehicle routing, hours of operation and signage strategy.

Landscaping and Boundary Treatment

A Visual Impact Assessment undertaken in accordance with 'Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013)' published by the Landscape Institute and Institute of Environmental Assessment.

A Landscaping and Planting Schedule.

Given the proximity to the A30 boundary, a detailed boundary treatment plan should be provided to ensure there will be no adverse impact on our assets, including our soft estate.

Given the proximity to our soft estate an Arboricultural Tree Survey should be prepared and therefrom a Tree Protection Plan submitted to ensure protection of retained trees in accordance with BS 5837: 2012 - Trees in Relation to Design, Demolition and Construction – Recommendations. A Tree Protection Plan must be submitted if any works

are proposed within the root protection areas of trees within our estate. Should it be necessary to undertake any work on retained trees to facilitate the development, it is important that such works are done in accordance with BS 3998: 2010 Tree work – Recommendations so as to prevent poor work / damage that may cause future decay and early death to the trees. Consultation with our Soft Estate Advisor will be necessary should any tree removals or works be required on trees within National Highways estate. Depending on any works that may be agreed, the applicant may be required to enter into an appropriate legal agreement with all costs borne by the applicant.

In respect of any proposed planting, we wish to advise that the following species must not be planted within 10m of our estate:

1. Blackthorn (*Prunus spinosa*)
2. Goat willow (*Salix caprea*)
3. Crack willow (*Salix fragilis*)
4. Dogwood (*Cornus sanguinea*)
5. Italian alder (*Alnus cordata*)
6. Bird cherry (*Prunus avium*)
7. Quaking Aspen (*Populus tremulans*)
8. Wild Privet (*Ligustrum vulgare*)

In addition, the following trees must not be planted in a position where at maturity they would be within falling distance of the carriageway or any significant National Highways asset:

9. Silver Birch (*Betula pendula*)
 10. Austrian Pine (*Pinus nigra*)
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11. Poplar (*Populus alba*, *Populus hybrid*, *Populus lombardii*)

12. English Oak (*Quercus robur*)

Furthermore, the planting of ash (*Fraxinus excelsior*) and larch (*Larix sp*) is now prohibited as stated in Statutory Plant Health Notices.

We wish to make clear that any existing National Highways soft estate should not be relied upon in respect of contributing any perceived benefits of visual mitigation as we are required to maintain our soft estate which may result in the removal or amendment of our soft estate at any time. The applicant is therefore required to ensure that appropriate and sufficient visual mitigation is provided as part of the development, and in addition to any National Highways soft estate that may be present. Any fences, screening and other structures must be erected on the developer's land, and far enough within the developer's land to enable maintenance to take place without encroachment onto highway land, as set out in Annex A, paragraph A1, of DfT Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development".

Drainage

A Flood Risk Assessment comprehensive drainage strategy detailing how surface water will be controlled in and around the site. In accordance with paragraph 50 of DfT Circular 02/2013, no water run off that may arise due to any change of use will be accepted into the highway drainage systems, and there shall be no new connections into those systems from third party development and drainage systems.

Road Safety

A 5-year Accident Analysis and Highway Safety Review of the strategic road network adjacent to/surrounding the site.

Given the proximity to the A30 boundary, a glint and glare assessment should be undertaken to ensure the development will not present a risk to road safety. The required contents of the Glint and Glare assessment are set out below.

Outline of the site context, including location, proximity to SRN, topography and height above sea level.

Outline of proposal details, including scale, site boundary, site map, mounting arrangements and orientation.

Overview of sun movements, including time, date, latitude and longitude, as well as the relative reflections.

Identification of potential receptors of concern. For Highways England the primary concern will be the reflection of the sun from the solar panels towards surrounding road users.

Identification of representative locations approximately every 100m along the surrounding road network where the solar development may be visible, if only marginally.

Undertake geometric calculations to determine whether a solar reflection may occur for each of the identified road based receptors from the proposed development. A height of approximately 1.5m is typically added to the overall ground height at a particular location to reflect the estimated eye level of a road user.

Where it has been calculated that a reflection may occur for road receptors, consideration should be made of the location of the solar reflection with respect to the location of the sun in the sky, its angle above the horizontal and the time of day at which a reflection could occur.

Provide a breakdown of the significance of the impacts and determine whether the solar reflection is likely to be a significant nuisance or a hazard to safety.

Consider the influence of appropriate measures such as screening, revised use of materials and orientation to mitigate the potential impact on road users.

Considerations

- 1) Does the panel elevation angle provided by the developer represent the elevation angle for all of the panels within the development?
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- 2) Does the assessment consider not only the reflection from panel faces, but also from the frame or reverse of the panel, as these can often be comprised of materials with reflective capability?
 - 3) Does the assessment consider an appropriate number of receptors, rather than a singular location?
 - 4) Is street view imagery and satellite mapping used for the purpose of desk-based studies up to date?

The above list is not exhaustive and we reserve the right to request additional information based on the information provided as part of any future application.

We acknowledge that once operational, the solar farm is unlikely to generate significant volumes of traffic but that during construction there will be a significant amount of construction traffic which will have a degree of impact on the locality and local residents owing to the narrowness of some of the rural roads on approach to the site. The County Highway Authority have assessed the proposal and have advised:

The highways scoping note has taken a fairly detailed review of the three best routes to provide for construction access to the site. I agree with the general consensus that the Long lane/route A option, would be the best route due to it being the most direct and passing the potential holding compound, in addition to utilising the widening and improvements that Long lane is currently undergoing.

The traffic management and temporary works to make any of the potential three routes acceptable, seem reasonable and minimise the impact upon the carriageway. The acceptance in avoiding through-route traffic in the village of Marsh Green has been established.

Should the application come forward for permission, It would be likely that we would recommend the provision of a Construction and Environment management plan to further mitigate construction disruption.

Residential Amenity

Policy D1- Design and Local Distinctiveness of the East Devon Local Plan requires that proposals do not adversely affect the amenity of occupiers of adjoining residential properties.

EN14 - Control of Pollution of the Local Plan states that permission will not be granted for development which would result in unacceptable levels, either to residents or the wider environment of:

- 1. Pollution of the atmosphere by gas or particulates, including. smell, fumes, dust, grit, smoke and soot.*
- 2. Pollution of surface or underground waters including: a) Rivers, other watercourses, water bodies and wetlands. b) Water gathering grounds including water catchment areas, aquifers and groundwater protection areas. c) Harbours, estuaries or the sea.*
- 3. Noise and/or vibration.*
- 4. Light intrusion, where light overspill from street lights or floodlights on to areas not intended to be lit, particularly in areas of open countryside and areas of nature conservation value.*
- 5. Fly nuisance.*
- 6. Pollution of sites of wildlife value, especially European designated sites or species.*
- 7. Odour.*

The solar installation would have its greatest impact on the small cluster of residential properties towards the western end of Wescott Lane whose outlook would be affected by the proposal.

The Council's Environmental Health Officer has considered the proposal and has advised that any forthcoming planning application should be accompanied by provide an Environmental Management Plan detailing the way in which environmental impacts will be addressed and incorporated into the design, layout and management of the

site. The plan should consider the impacts of noise (including low frequency noise), traffic and light on the local environment, and the way in which these impacts will be mitigated.

In addition any planning application should be accompanied by a Construction Environment management Plan which details how the impacts of the construction phase of the development would be managed to reduce the impacts on local residents.

Flood Risk:

Policy EN21 - River and Coastal Flooding of the Local Plan states that a sequential approach will be taken to considering whether new developments excluding minor developments and changes of use.

Wherever possible developments should be sited in Flood Zone 1 as defined in the East Devon District Council Strategic Flood Risk Assessment¹⁰⁶. Only if there is no reasonably available site in Flood Zone 1 will locating the development in Flood Zone 2 and then Flood Zone 3 be considered. The flood vulnerability of proposed development, as set out in Appendix D of the East Devon Strategic Flood Risk Assessment will be taken into account.

If, after following this sequential approach, acceptable sites cannot be found and the development is necessary for wider sustainable development reasons, development may be permitted if all of the following criteria are met.

- 1. It is demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk.*
 - 2. The proposed development is on previously developed land that is suitably located and available for development, unless no reasonable alternative sites are available.*
 - 3. A flood risk assessment demonstrates that the development will be safe, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall.*
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This shall not apply to 'highly vulnerable' development in Flood Zone 3a or 'less vulnerable'; 'more vulnerable'; or 'highly vulnerable' development in Flood Zone 3b as defined in the East Devon Strategic Flood Risk Assessment.

Whilst the Environment Agency no longer provide bespoke technical pre-application advice without recovering their costs as part of their Planning Advice Service, they have provided a preliminary opinion on the proposal:

The proposed development is located partially within flood zone 2 and 3, and as a proposal which is classed as essential infrastructure, would be subject to both the sequential test and exception test. The site also proposes to develop land directly adjacent to a main river. We would recommend that the applicant takes a sequential approach to the location of the proposal, including the ancillary equipment which we note is not yet shown on the submitted maps, to steer development away from the areas at flood risk.

We would support the appropriate use of natural flood management such as the leaky dams to manage flood risk.

Drainage:

Policy EN22 - Surface Run-Off Implications of New Development Planning permission for new development will require that:

- 1. The surface water run-off implications of the proposal have been fully considered and found to be acceptable, including implications for coastal erosion.*
 - 2. Appropriate remedial measures are included as an integral part of the development, and there are clear arrangements in place for ongoing maintenance over the lifetime of the development.*
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3. Where remedial measures are required away from the application site, the developer is in a position to secure the implementation of such measures.

4. A Drainage Impact Assessment will be required for all new development with potentially significant surface run off implications.

5. Surface water in all major commercial developments or schemes for 10 homes or more (or any revised threshold set by Government) should be managed by sustainable drainage systems, unless demonstrated to be inappropriate.

In respect of drainage proposals, the advice of the County Council's Flood Risk Management Team has been sought who have advised the following:

Whilst the applicant has noted the use of swales for managing surface water, we would still like to highlight our standing advice to ensure that surface water management at solar farms is fully understood.

The applicant has also noted that leaky dams and scrapes shall be included along the watercourse. The applicant may find it informative to monitor the existing watercourses within the site, including the southwest and northeast watercourses. This monitoring could occur before, during and after rainfall events to see how the watercourses behave.

Temporary widening of roads has been highlighted. The applicant will need to consider surface water management where roads are widened. The applicant may also need to consider the full length of the road.

A temporary waiting area for deliveries has also been highlighted. This waiting area will also need to consider surface water management.

Maintenance access to the culvert beneath the A30 may need to be considered.

Construction

Exceptional care will need to be taken during the construction of these sites because the ground surface is likely to be cultivated or severely disturbed by plant movement and left with exposed soil. As a result, there is great potential for soil erosion and the concentration of downslope flows in rills or gullies, as well as water quality issues for any downstream receiving watercourse or agricultural land.

Devon County Council's Flood and Coastal Risk Management Team therefore strongly recommends that no work is undertaken until a wide perimeter cross-contour vegetated swale is constructed around the downstream boundary of the site. It is essential that these swales are constructed to intercept flows and limit the aforementioned impacts to the nearby watercourses and surrounding agricultural land.

Ancillary Buildings

Any ancillary buildings on the site, such as inverter cabins or substations, will likely contribute to the perturbed surface water runoff, and without sufficient control measures, will exacerbate the concentration of downslope flows and soil erosion.

As a means of controlling these impacts, filter strips should surround the concrete bases of the ancillary buildings to capture any runoff from the roofs, which should in turn be conveyed to the wide cross-contour perimeter swale around the downstream boundary of the site.

Access Tracks

The movement of plant across these sites is likely to further disturb the ground surface and contribute significantly to soil erosion and water quality issues downstream/downslope.

Any access tracks across the site should therefore be constructed with permeable materials which can be demonstrated to withstand the significant loadings of the machinery required for the construction of these sites. In order to manage any surface water exceedance from the permeable tracks, further swales should be incorporated to convey the water to the cross-contour perimeter swale at the downstream boundary of the site in order to maintain downstream/downslope water quality.

Vegetation

Concentrated runoff from the panels is likely to lead to erosion of the ground surface below, contributing significantly to water quality issues downstream/downslope.

Tussock grasses should dominate around and beneath the photovoltaic panels to limit soil erosion caused by runoff from the panels. Allowing the site to naturally colonise is likely to leave the soil surface significantly vulnerable to erosion, particularly during intense precipitation events. It is also imperative that these grasses are maintained regularly when the site is operational as the soil structure and the quality of the downstream watercourse or agricultural land will greatly depend on this.

It is strongly advisable that the reader consults Natural England's Technical Information Note (TIN101), 'Solar Parks: Maximising Environmental Benefits', for further information on the vegetation and soil quality issues associated with these developments.

The above document can be accessed through the National Archives at the following address: <http://publications.naturalengland.org.uk/publication/32027>

Ordinary Watercourses

Ordinary watercourses which run through the site may need to be crossed to enable ground works to take place.

If any temporary or permanent works take place within these watercourses (such as an access culvert or bridge), Land Drainage Consent will need to be obtained from Devon County Council's Flood and Coastal Risk Management team prior to any works commencing. Details of this procedure can be found at:

<https://new.devon.gov.uk/floodriskmanagement/land-drainage-consent/>

Aerodrome Safeguarding:

Policy TC12 - Aerodrome Safeguarded Areas and Public Safety Zones The outer boundary of the aerodrome safeguarded areas and the Public Safety Zones for Exeter International Airport are shown on the Proposals Map. Within these areas planning permission will not be granted for development that would prejudice the safe operation of protected aerodromes or give rise to public safety concerns. Planning permission will not be granted for developments in the vicinity of an airport (or that could impact on safe operation of aeroplanes) that would compromise air safety by creating physical obstructions that could interfere with flight paths or navigational aids. Permission will not be granted for developments that will unduly prejudice future development or expansion programmes or potential at Exeter airport.

We have received the following comments from Exeter Airport:

The main concern from this proposal due to the location is potential Glint/Glare from the array. This is mentioned within the Pre-application report section 3.9 and that a glint and glare assessment has been carried out. We would like to see the full report and ensure it has been carried out by an aviation specialist. There are various departments within the airport that also need sight of the assessment to study and ensure there will be no effect on aviation safety which must remain paramount.

Further to my previous response below and in addition to the main concern regarding Glint and Glare from the array. There are other Aerodrome Safeguarding concerns that must be taken into consideration from a development of this size and in this location. The proposal is in an area where Aircraft are in a critical phase of flight either arriving or departing the airport and aircraft safety is paramount.

In brief Aerodrome Safeguarding is a process of checking proposed developments to:

Protect blocks of air through which aircraft fly, by preventing penetration of surfaces created to identify their lower limits.

Protect the integrity of radar and other electronic aids to air navigation, by preventing reflections and diffraction of the radio signals involved.

Protect visual aids, such as Approach and Runway lighting, by preventing them from being obscured, or preventing the installation of other lights which could be confused for them, including glint/glare from solar arrays. In brief lighting for the site should be designed in such a way that it is not confusing or dazzling to pilots or air traffic control.

Avoid any increase in the risk to aircraft of a bird strike by preventing an increase in hazardous bird species in the vicinity of the aerodrome and, whenever the opportunity arises, to reduce the level of risk.

The additional areas of concern include;

Tree planting – Some of the site is on land that already penetrates one of the airports Obstacle Limitation Surfaces and any additional tree planting would further increase this unacceptable hazard. Additionally, large trees can act as an attractant to hazardous bird species which in turn can lead to an increased risk of bird strike to aircraft.

Tree planting – Some of the site is on land that already penetrates one of the airports Obstacle Limitation Surfaces and any additional tree planting would further increase this unacceptable hazard. Additionally, large trees can act as an attractant to hazardous bird species which in turn can lead to an increased risk of bird strike to aircraft.

Hedgerow planting – Additional hedgerows can act as a nesting and foraging attractant to hazardous bird species.

Drainage methods – Passive drainage and Swales if not designed with aerodrome safeguarding considerations can become an attractant to birds if standing water becomes permanent.

It is recommended that any development that has the potential to become a bird attractant should be the subject of a Wildlife Hazard Management Plan, produced by a recognised aviation wildlife specialist.

Technical Assessments – Due to the location further technical assessments may be required to ascertain if there is likely to be any impact on the airports Navigational Aids and/or Instrument Flight procedures.

It is noted in the Pre-Application Report 3.7.7 that a short-term lease of a Deliveries Reception compound at Exeter Airport is in early discussion. This is not something we are aware of and further information is required.

We would expect any forthcoming planning application to address the observations made by Exeter Airport.

Heritage Impact:

Under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Council has a duty in favour of preserving heritage assets. Paragraphs 199-202 of the NPPF set out the policy position in relation to how to assess the harm from a proposal to designated heritage assets and which advises that great weight should be given to an asset's conservation and this should be proportionate to the importance of the asset. Relevant policies for an assessment of the impact of proposals from the East Devon Local Plan are as follows:

Policy EN9 - Development Affecting a Designated Heritage Asset states that the Council will not grant permission for developments involving substantial harm or total loss of significance of a designated heritage asset unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site.

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation.

c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible.

d) the harm or loss is outweighed by the benefit of bringing the site back into use. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance should be wholly exceptional.

Where total or partial loss of a heritage asset is to be permitted the Council may require that:

e) A scheme for the phased demolition and redevelopment of the site providing for its management and treatment in the interim is submitted to and approved by the Council. A copy of a signed contract for the construction work must be deposited with the local planning authority before demolition commences.

f) Where practicable the heritage asset is dismantled and rebuilt or removed to a site previously approved.

g) Important features of the heritage asset are salvaged and re-used.

h) There is an opportunity for the appearance, plan and particular features of the heritage asset to be measured and recorded.

i) Provision is made for archaeological investigation by qualified persons and excavation of the site where appropriate.

The advice of Historic England and the Council's Conservation Officer has been sought given the sites proximity to heritage assets.

The comments from Historic England are as follows:

From an initial desk-based assessment there are a number of listed buildings, where the site could fall within their setting. The majority of these are grade II; however, we would note the important cluster at Rockbeare Manor, which includes the grade I listed house,

the grade II* listed stable and numerous other grade II* and grade II listed buildings as well as the grade II registered park and garden that covers the site. The boundary of the garden almost abuts the application site.

Any assessment should contain an examination of the potential impacts upon all heritage assets likely to be affected, including designated heritage assets¹ and their settings together with potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This covers buildings, historic open spaces, historic features and the wider historic landscape including below-ground archaeology.

We advise that the local authority's conservation and archaeology advisers are closely involved throughout the preparation of the Environmental Statement. They are best placed to advise on: local historic environment issues and priorities (including access to data held in the Historic Environment Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

The comments from the Council's Conservation Officers are as follows:

The following comments concur with those made from Historic England and are in addition to them. They are as follows;

I would disagree with the method of assessment and limiting it to an area of 2km radius. It is made clear within the NPPF that the extent of the setting of a designated asset "is not fixed and may change as the asset and its surroundings evolve". (NPPF 21, Annexe 2 Glossary).

The conclusions are rather early as there is more information due, such as the transformers and other associated equipment. They will all increase the negative impact by virtue of the cumulative change to the setting of the heritage assets and the natural landscape. It is to what degree of harm and how if at all it can be mitigated.

This does not accord with the Historic Environment GPA Note 3, page 9, section 21, that the assessment should be based upon a “Zone of Theoretical Visibility” (that basically does not take into account any landscape artefacts).

There is without doubt a change to the setting of the heritage assets. A more thorough heritage impact assessment needs to be made.

The proposal includes a variety of unsympathetic built form to this rural setting, e.g. the solar panels themselves, the tall fencing, transformers, and associated equipment, permanent built stores/office at site entrances.

The proposal need to be more comprehensive with the actual details of the all new built form, heights and massing in particular.

The archaeology should be considered as a separate assessment and for any mitigation measures to the historic built environment and its setting.

As it stands there is insufficient detail to make a full appraisal, however the assessment submitted so far is minimal and lacks evidence.

Suggested mitigation and recommendations for any further application – to supply more detailed and balanced heritage impact assessment that is justified with sufficient evidence to support the proposal. To take into account all the heritage assets including their curtilage listed buildings, key views, designed views and kinetic views for instance. Not to be limited to the 2km radius.

Question – are there any specific benefits that could directly improve the local historic housing stock, listed or otherwise?

Archaeological Impact:

Policy EN7 - Proposals Affecting Sites which may potentially be of Archaeological Importance states that when considering development proposals which affect sites that

are considered to potentially have remains of archaeological importance, the District Council will not grant planning permission until an appropriate desk based assessment and, where necessary, a field assessment has been undertaken.

It is understood that the applicant has been liaising with the County Historic Environment Team with regard to the heritage information required to support any EIA or planning application for a solar farm in this area. The County Archaeologist has advised that he concurs with the methodology set out on page 29 of the Cultural Heritage/Archaeology section of the Screening Opinion prepared by Enzygo Environmental Consultants (document ref: CRM.3025.002, dates 26th November 2021), namely the undertaking of a geophysical survey, which we believe is being undertaken at the moment, followed by appropriate mitigation - either by design or further archaeological work - if required.

Public Benefits:

It is clear that the proposal seeks to put forward a number of public benefits which includes the provision of a community area, improvements to Green Infrastructure and ecological enhancement which includes the woodland extension adjacent to the CWS.

In respect of public paths it is noted that Westcott Lane, which runs across the site west of Marsh Green is a county road currently closed due to past flood damage to the carriageway and that the County Council has no plans to re-open it but, it remains a narrow, historic lane, well used by locals for recreation and affords fairly extensive views across an attractive, deeply rural landscape. There is opportunity as part of the mitigation proposals for the lane to be rededicated as a public bridleway with minor surfacing and drainage works to address safety issues.

The inclusion of a community area to the south east of Marsh Green is noted. Any forthcoming planning application should clearly explain what this will comprise and provide details of any proposed works, how it will be used, managed and funded and who will be responsible for it.

The application also offers the opportunity to offer further public access that can help to partially compensate for adverse impacts on Watkins Lane and enhance the existing rights of way network. We have advised that there would be significant public benefit if the

existing private metalled track to the south of the County Wildlife Site woodland could be made available as a permissive bridleway.

The public benefits from the proposals are likely to weigh in favour of the proposal within the overall planning balance however consideration would have to be given to how in particular, the community area could be secured as part of any planning permission having regards for the tests set out with the planning practice guidance in respect of being

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Conclusions:

Whilst the site is within the open countryside, there is support for a large scale solar farm within the NPPF and under the provisions of Strategy 39 of the East Devon Local Plan which supports in principle renewable or low carbon energy projects subject to them following current best practice guidance and the adverse impacts on features of environmental and heritage sensitivity, including any cumulative landscape and visual impacts being satisfactorily addressed.

Introducing a solar farm of this size and scale would have a significant impact on the rural landscape character of the area with localised harm arising from views of the development from the surrounding rural roads, through field gates and public footpaths in the area and from the A30. Whilst the site is not the subject of any national or local landscape designations it is rural in character and therefore sensitive to change from this proposal. The visual harm from the proposal would weigh against the proposal within the overall planning balance.

Any forthcoming planning application would need to give careful consideration to the impact of the solar farm on the setting and significance of heritage assets in the vicinity of the site and should be informed by a detailed heritage impact assessment.

Other technical matters that have been set out within this letter from key statutory consultees should be addressed in any submission with the appropriate technical reports provided however broadly officers are supportive of the provision of renewable energy and the benefits it provides to not only the local area but more generally to the national supply and this would weigh positively in the balance of issues.

I trust I have set out the advice of the team clearly and answered your pre-application enquiry in sufficient detail. Please also accept our sincere apologies for the length of time it has taken to provide this written response.

Please note that all comments are made in good faith at officer level only and should not be seen to prejudice any future decision of the Local Planning Authority.

Yours sincerely

**Paul Golding
Senior Planning Officer (West Team)
For Head of Economy**

EDDC Landscape and green infrastructure response to planning enquiry

Application no.	21/0155/PREAPP		
Title	Ford Oaks, Solar Farm Marsh Green		
Description	Pre-app enquiry for development of 87Ha solar PV farm		
EDDC Planning Area	West		
Date of response	6 December 2021	Version	0.2

1 INTRODUCTION

This report forms the EDDC's landscape response to the Pre-application inquiry for the above site.

The report provides a review of landscape related information submitted with the application in relation to adopted policy, relevant guidance, current best practice and existing site context and should be read in conjunction with the submitted information.

The information provided is for guidance purposes only and should not be taken as endorsement or otherwise of the proposed scheme.

The proposed site lies within a low lying, gently undulating rural area south of Rockbourne and the A30. The predominant land-use is agricultural with scattered isolated farms and small settlements. The site itself is predominantly grazing land with traditional hedgerows and numerous mature trees, predominantly oak, both within hedge-lines and as solitary specimens or small groups within fields. The proposed solar farm extends to 87Ha with 30-35MWp generating capacity.

This response is based on the following submitted details

- Pre-application planning advice report - Enzygo
- LVIA view point locations and ZTV – Steele Landscape Design
- Preliminary landscape and ecology management plan drawing - Devon Wildlife Consultants

2 RELEVANT POLICY

In addition to policies identified in the Pre-app planning advice report the following landscape related policies are also relevant and should be taken account of:

Strategy 3 - Sustainable Development

The objective of ensuring sustainable development is central to our thinking. We interpret sustainable development in East Devon to mean that [inter-alia] the following issues and their inter-relationships are taken fully into account when considering development:

- a) **Conserving and Enhancing the Environment** - which includes ensuring development is undertaken in a way that minimises harm and enhances biodiversity and the quality and character of the landscape.
- b) **Prudent natural resource use** - which includes minimising fossil fuel use therefore reducing carbon dioxide emissions. It also includes minimising resource consumption, reusing materials and recycling. Renewable energy development will be encouraged
- c) **Promoting social wellbeing** - which includes providing facilities to meet people's needs such as health care, affordable housing, recreation space and village halls.

D3 - Trees and Development Sites

Permission will only be granted for development, where appropriate tree retention and/or planting is proposed in conjunction with the proposed nearby construction. The council will seek to ensure, subject to detailed design considerations, that there is no net loss in the quality of trees or hedgerows resulting from an approved development. The development should deliver a harmonious and sustainable relationship between structures and trees. The recommendations of British Standard 5837:2012 (or the current revision) will be taken fully into account in addressing development proposals.

No building, hard surfacing drainage or underground works will be permitted that does not accord with the principles of BS 5837 or Volume 4 National Joint Utilities Group (NJUG) Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees – Issue 2 (or the current revision or any replacement) unless, exceptionally, the Council is satisfied that such works can be accommodated without harm to the trees concerned or there are overriding reasons for development to proceed.

The Council will as a condition of any planning permission granted, require details as to how trees, hedges and hedge banks will be protected prior to and during and after construction. The Council will protect existing trees and trees planted in accordance with approved landscaping schemes through the making of Tree Preservation Orders where appropriate or necessary. Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

2.3 Other policy guidance

Devon Landscape Policy Group Advice Note No. 2: Accommodating Wind and Solar PV Developments in Devon's Landscape, LUC June 2013.

3 SCALE OF DEVELOPMENT

The proposed site extends to over 87Ha with 30-35MWp generating capacity. DLPG Advice Note 2 categorises the scale of solar farms from very small (<1Ha) to very large (>15Ha) and the proposed development would therefore fall into the very large (largest) category.

4 LANDSCAPE AND VISUAL IMPACT ASSESSMENT (LVIA)

A full Landscape and Visual Impact Assessment will be required, prepared in accordance with Guidelines for Landscape Visual Impact Assessment, 3 edition, Landscape Institute/ Institute of Environmental Management, 2013 and with reference to DLPG Advice Note 2.

The LVIA should provide a thorough baseline review and consider all likely landscape and visual impacts arising from the development during construction and for the operational phase at years 0, and 15 as well as end of life post-decommissioning. The assessment should take account of noise and lighting impacts.

The assessment should also consider cumulative effects of other nearby solar farms both completed and any current applications or consents for renewable energy schemes not yet implemented.

A full visual assessment should be provided as part of the LVIA and images based on Technical Guidance Note 06/19, Visual Representation, Landscape Institute September 2019.

The selection of viewpoints submitted with this enquiry is generally considered appropriate but two additional viewpoints are identified in the Appendix, figure 2 below. Furthermore, sufficient viewpoints should be selected along Westcott Lane (Appendix fig. 2) to adequately represent the extent of visibility of the proposed development for walkers travelling along it in both directions.

High resolution photographic images should generally be presented at A3 size and include panoramic views as well as a single shot images with 40 degree field of view for each view point. Photographs should be taken in clear weather conditions between late autumn and early spring when trees and hedgerows are not in leaf.

The location, direction of view, date and time, make and model of camera and sensor format and the make and focal length of lens, horizontal field of view, distance to nearest site boundary and recommended viewing distance of printed image should be included on each image. One copy of the visual assessment should be presented as high resolution printed documents as well as in electronic format.

Photomontages of key views from publicly accessible areas should also be provided showing the proposed scheme at completion and 15 years on. Selection of key view locations should be agreed with the LPA following completion of baseline photography.

5 SCHEME PROPOSALS – REQUIRED INFORMATION

The siting and design of the development should reflect guidance provided in DLPG advice note 2, Section 3 – Siting, Design and Assessment of Solar PV Developments.

Submitted landscape details should include:

- Site plans and sections indicating existing and proposed levels and vegetation and showing extent and location of site clearance, solar arrays, associated buildings and structures, temporary and permanent access tracks, compounds and storage areas, overhead and underground utilities, fencing, earthworks, drainage, proposed planting and any signage, lighting or security cameras that may be required.
- Detail plans and elevations and details of proposed finishes of all buildings, structures and housings.
- Drainage strategy including detail construction drawings of leaky dams, swales etc
- Construction details for solar arrays and proposed access roads, hedgebanks, gates and fencing.
- Hedgerow assessment providing a baseline condition survey and identifying important hedgerows and prescriptions for enhancement and future management to maximise landscape and bio-diversity value.
- An outline de-commissioning plan.

The following information will be required as a condition of approval if not included with the application:

- Detailed planting plans and specifications and 5 year maintenance plan.
- A 40 year site landscape and ecology management plan covering management of trees, hedgerow, ground layer and water bodies with an emphasis on maximising biodiversity value

and retaining and enhancing local landscape character. Hedgerow management should be based on the hedgerow cycle as set out in [Hedgeline - Hedge management cycle](#). The plan should set out:

- a) Extent, ownership and responsibilities for management and maintenance.
- b) Details of how the management and maintenance of habitats, open space and associated features will be funded for the life of the development.
- c) A description and evaluation of landscape and ecological features to be created/ managed and any site constraints that might influence management.
- d) Landscape and ecological aims and objectives for the site.
- e) Detailed maintenance works schedules covering regular cyclical work and less regular/ occasional works in relation to:
 - o Existing trees, woodland and hedgerows.
 - o New trees, woodland areas, hedges and amenity planting areas.
 - o Grass and wildflower areas.
 - o Biodiversity features - hibernaculae, bat/ bird boxes etc.
 - o Boundary structures, drainage swales, water bodies.
- f) Arrangements for inspection and monitoring of the site and maintenance practices.
- g) Arrangements for periodic review of the plan.

The application should also be accompanied by:

- Phase 1 extended habitat survey
- Ecological impact assessment and biodiversity net gain calculation in accordance with latest DEFRA guidance.
- BS 5837 Tree survey, Arboricultural impact assessment and Tree and hedgerow protection plan. This should include consideration of proposed haul routes and off-site access requirements.

6 POTENTIAL ISSUES TO BE ADDRESSED

a) There are already a number of solar schemes constructed or consented to the north and east of Marsh Green. This application seeks to further develop extensive solar generation to the west and south of Marsh Green, which will effectively ring the local community with large scale pv development. While development within much of the core of the site is likely to have limited visual impact from public vantage points, particular care will be required to ensure around the fringes that the visibility of solar arrays from publically accessible roads and viewpoints is limited.

b) In respect of public paths it is noted that Westcott Lane, which runs across the site west of Marsh Green is a county road currently closed due to past flood damage to the carriageway and DCC has no plans to re-open it but, it remains a narrow, historic lane, well used by locals for recreation and affords fairly extensive views across an attractive, deeply rural landscape. The currently proposed extent of solar arrays to either side would significantly alter the character and experience of the landscape to either side. The impact seems likely to be especially felt on the slopes to the west which rise to a north-south running ridge and where development is also likely to be prominent in longer distance views from the east of Marsh Green. The acceptability of their inclusion particularly is questioned. An adequate buffer should also be maintained to either side of Westcott Lane.

There is opportunity as part of the mitigation proposals for the lane to be rededicated as a public bridleway with minor surfacing and drainage works to address safety issues.

- c) The inclusion of a community area to the south east of Marsh Green is noted. The application should clearly explain what this will comprise and provide details of any proposed works, how it will be used, managed and funded and who will be responsible for it.
- d) The application offers the opportunity to offer further public access that can help to partially compensate for adverse impacts on Watkins Lane and enhance the existing rights of way network – refer Appendix figure 1. It would be especially useful if the existing private metalled track to the south of the County Wildlife Site woodland could be made available as a permissive bridleway.
- e) The inclusion of field parcel D1, through which Aylesbeare footpath 7 runs, will have an adverse impact on path users contrary to EDDC local plan policy TC4. It is recommended that this field parcel is omitted from the scheme for this reason.
- f) The provision of security fencing and signage could have significant visual impact and could severely restrict wildlife movements. Careful consideration should be given to the design, location and extent of fencing to avoid or mitigate such effects while respecting local landscape character. The use of deer netting rather than welded mesh panels would be preferable in this regard both visually and for its greater permeability to wildlife.
- g) Given its rural nature the site is likely to be sensitive to noise particularly those field parcels away from the A30 and due consideration should be given to this.
- h) Experience of visiting existing solar sites post-construction indicates that proposed mitigation planting and bio-diversity enhancement measures frequently fail to meet expectations due to poor maintenance and monitoring. Consideration should be given to transferring responsibility for management and maintenance to an accountable body such as parish council, wildlife trust etc. through an appropriate legal agreement.

The above list of potential issues is not necessarily comprehensive and any further adverse impacts that may be identified through the site appraisal and design process should be appropriately considered and mitigated.

Chris Hariades CMLI

EDDC Landscape Architect & Green Infrastructure Officer

Appendix

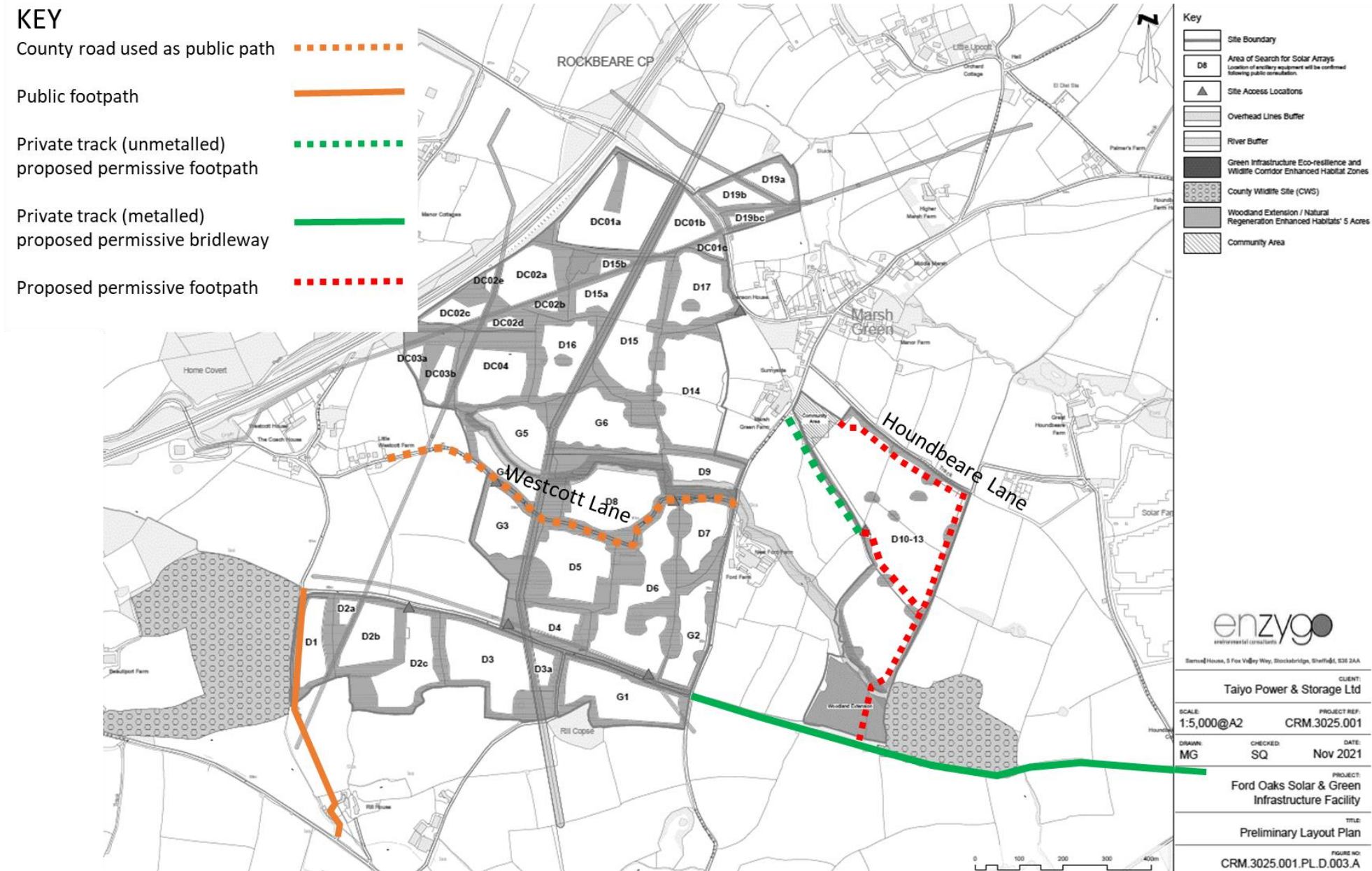
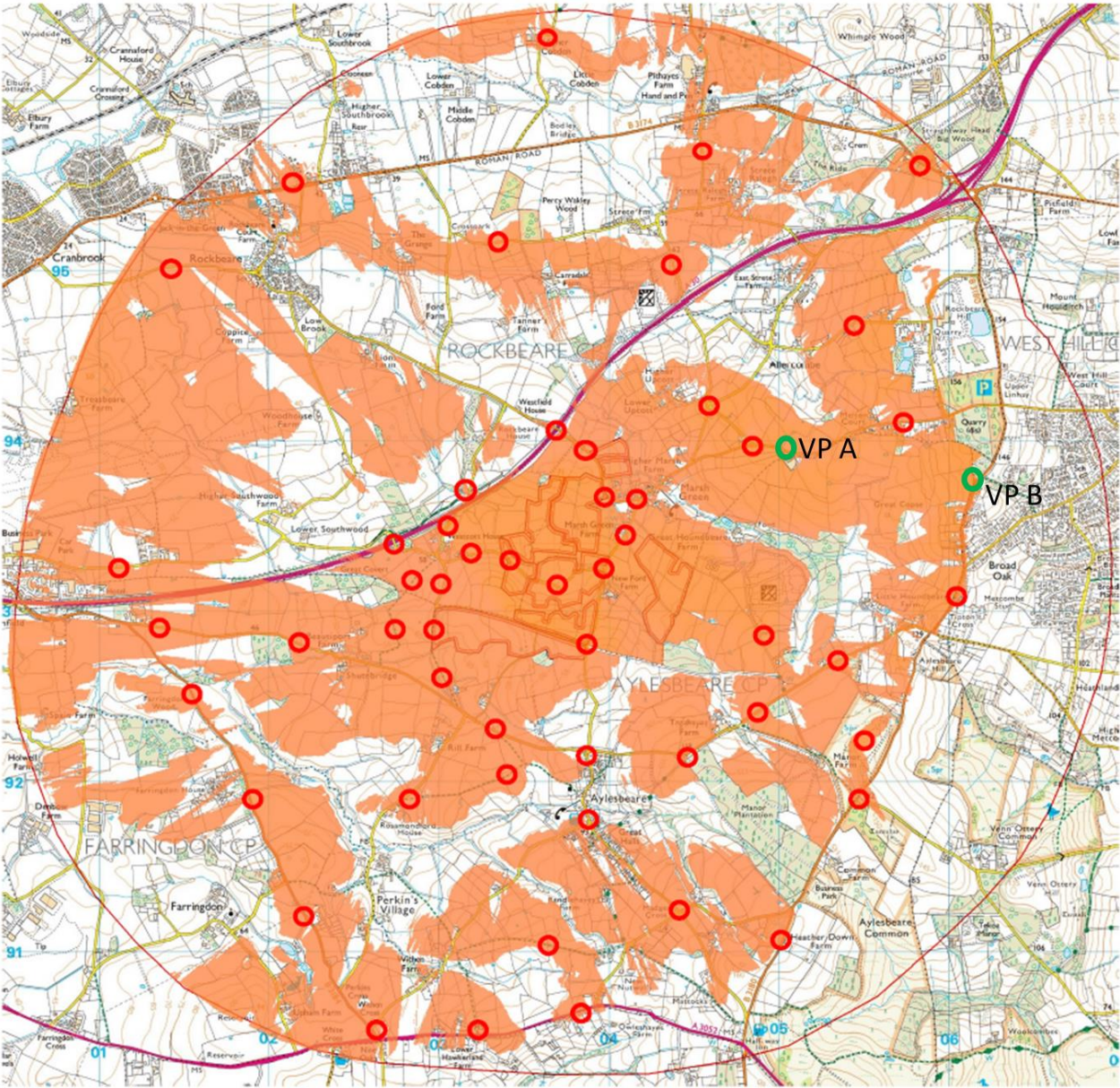


Figure 1- Existing and suggested public paths

FORD OAKS - LVIA Viewpoint Locations



○ Viewpoint Location

○ Additional view point

VP A – Field gate east of
Hounbeare Farmhouse

VP B – Field gate south of
B3180



Figure 2 - Proposed viewpoints with additional locations