A green circle with a silhouette of a city

Description automatically generated**Presentation to MBC Planning Group 31 August 2023**

The function of this meeting is to decide whether the advantages resulting from the present proposal will outweigh the harms. SAVE considers that they CANNOT, for 3 reasons:

1. SITE: The proposed site is inappropriate because it contravenes national, ward and parish stipulations for environmental protection. It does not accord even with the solar industry’s own standards for site selection.
2. HARMS V BENEFITS: The proposal systematically downplays harms and exaggerates benefits.
3. NATIONAL DEBATE: Disadvantages of ground-mounted solar installations are becoming ever more prominent in the national debate.

I will elaborate very briefly on each of these points.

**Site**

1. at just under 100 hectares, the site is out of proportion to the village envelope, and is destructive to the amenity for local people, walkers and visitors to the area. The Planning Officer’s recommendation is made at the expense of every provision in national and local plans designed to protect the environment and preserve the landscape character from urbanising degradation. Our full website objection posted in July 2022 has supplied a lengthy list of references.
2. the site is environmentally asset rich including an SSSI and a heritage canal.
3. this section of the Vale is also rich in architectural and archaeological assets, fully tabled, only to be downgraded, in JBM Application 003 Table 3-6.

**Harms and Benefits**

As observed by Natural England, Historic England, Reading Agricultural Consultants and Cornwall Environmental Consultants, the harms associated with the scheme are consistently downplayed as ‘slight’ or ‘low’. SAVE emphasises that these designations should NOT be accepted as objective fact, even if they are by the Planning Officer eg 8.4.15: ‘Development of the solar farm would not result in significant adverse effects upon the rural landscape’.

One clear example is found in what is said about hedge-screening measures. Hedges cut to 2m will not succeed in screening 3-meter-high panels. Hedges are deciduous and have no leaf coverage for 6 months of the year. In particular, CEC have emphasised the additional effects on landscape character of *cumulative* consented schemes. This, and all other specified mitigating landscape measures are dependent upon their maintenance for 40 years, in which SAVE has no confidence.

A major harm, not even mentioned in JBM’s application but *essential* to any cost/benefit analysis, is the taking out of commission of productive agricultural land currently being deployed to grow foodstuffs. JBM have addressed this only in negative terms, by seeking to devalue the soil grading as not BMV. SAVE emphasises local knowledge and experience showing that there is very little difference between 3a and 3b grading, particularly of the soil on site. Rent is being paid by the farm based upon this high soil quality and crop yields are always higher than average. Our MP Alicia Kearns is to table an amendment to prevent building on 3b as well as on 3a soil.

The Planning Officer’s calculation that benefits outweigh harms is arrived at by according no quantitative value whatsoever to existing beneficial use of the site; and is supported by a belief that energy production in this form is important *to the exclusion of every other consideration.* Benefits are variously stated as powering 15k, 19k and in one document, over 21k homes!

**National Debate**

Council members can read critiques of the principles upon which ground-mounted solar farms are based frequently in the national press. Some even argue *for a ground moratorium*. Daily we read that such schemes are having to wait for inordinate lengths of time for grid connectivity, since there is insufficient national capacity. Add these issues to those of a 40-year lease tenure and to decommissioning, and it seems likely that this proposal will result in the beautiful rural landscape becoming a waste land to nobody’s benefit.

Councils and national politicians are increasingly alert to the drawbacks of ground-mounted solar schemes. Alicia Kearns pointed out in Parliament in July that more than 50% of land nationally with proposed solar plants is in Lincolnshire, Leicester and Rutland: 77 solar plants currently proposed in Lincolnshire and bordering counties, totalling over 38,000 acres.

Very recently South Kesteven District Council’s rejection of schemes near Folkingham and Foston was made on the grounds of food security protection.

SAVE strongly urges that accepting the proposal today will seem like a wrong decision in the very near future. The tide is turning against solar energy *gathered in this form.*

**References and additional materials (not to be delivered as part of presentation but in response to questions)**

1. an installation of 3m tracking-panels set behind a 2m high perimeter fence patrolled by a 3m CCTV mast and housing multiple container-sized inverter and transformer buildings, the entire site surrounded by 5m aggregate access tracks.

eg British Energy Security Policy 7 April 2022; NPPL 15, paras 170,175; Melton and Rushcliffe Landscape Sensitivity Study 7:14; Melton Local Plan 3.3.4 and Policies SS2, EC2, EN1, EN4 and EN10 ; Bottesford Neighbourhood Plan pp.13 Table 3, p.18 §63, p.26 §82, p.31 §93, p.33. All of the principles in the Neighbourhood Plan Policies 2, 3 and 7 are undermined by the scheme.

1. the proposed site runs contrary to the Government’s and the solar industry’s own guidelines on appropriate locations for solar installations because it is not brownfield or pre-existing grassland. It is arable land being well-tended and farmed. It is not, contrary to JBM’s assertion, of low quality.

Grade 3a /3b as evidenced from the MBC website, is of ideal make up for the types of crop production grown across the site. For over 50 years and across five generations of the same family on this site, yields have been consistently above the UK average. There is very little difference between 3a and 3b grading, particularly of the soil on site. Rent is being paid by the farm based upon this high soil quality which conflicts with JBM’s suggestion the soil is of low quality. A portion of the designated site is in fact Grade 2.

Historic England: ‘we do have concerns on heritage grounds due to the impact upon the settings of the designated heritage assets. We consider the impacts and effects to be higher than indicated in the EIA.’

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SAVE has two objections to the power benefits claimed by JBM:

1. we have amassed a considerable body of evidence based on Met Office data and conveyed to MBC, showing that this proposal exaggerates the amount of energy it will produce and that the outputs cited by JBM are inconsistently stated.
2. In common with most other JBM proposals, this one claims to produce 49.9 Mw ie just below the 50Mw threshold that would make it an NSIP. But external calculations indicate that based on the size of the site, even with lower outputs as noted above, it should produce considerably in excess of 49.9Mw. It is either an NSIP, or it needs to be reduced in area.
3. with unique green-winged orchids and great crested newts; a heritage canal built in the eighteenth century; nesting for skylarks and meadow pipits and 6 species on the red list.