

DPD

From: Jeremy Salter
Sent: 26 March 2016 18:21
To: DPD
Subject: Landscape Implications of Solar PV Proposals - SPD

Follow Up Flag: Follow up
Flag Status: Completed

Dear Forward Planning Officers,

Following our attendance at the Consultation at Phoenix House on Tuesday, 8th March, we, on behalf of Tiverton Civic Society, submit the following comments about the draft SPD

Comments on the Solar Panel SPD to contribute to the Civic Society's response

General Comments

This seems to be a carefully researched, thorough, document not only outlining the main landscape characteristics of Mid Devon, but also indicating the general level of impact of solar panels of various sizes on these characteristics. At the same time, it is clear that applicants for planning permission will need to get pre-planning guidance for specific sites as well as taking guidance from the document, and consider the cumulative effects of solar panel developments in the immediate area.

The SPD gives

- a helpful definition of landscape sensitivity,
- appropriate categorisation of landscape types,
- a clear banding of solar panel development size,
- guidance and criteria for the judgement of landscape sensitivity, and
- emphasises the need for Environmental Assessment Impacts for all applications other than small domestic.

Overall, we think the levels of assessment for solar panel developments for different bandings is broadly correct. The nature of the varied landscapes across the District can generally only support small to medium sized bandings, and some landscapes cannot support any developments of this nature.

Shortcomings of the document

1. P.11 Landscape Character Assessment Framework.
 - a. Having read landscape character assessments, I wonder why *Plateaux* have been grouped with *Ridges* in *LCT 1* as the impact for solar panel development is very different for each.
 - b. Would 1E, wooded ridges and hilltops, be better classified under *LCT 2 Scarp Slopes*, becoming 2E? They seem to have more in common, neither being able to support much in the way of solar panel development.
 - c. 1F contradicts its upland classification with its description as 'farmed lowland moorland'. Perhaps 'farmed moorland' would be a better term.
If accepted, these changes would need to be followed through the document.
2. There is no mention or discussion of the environmental impact of solar development on SSSIs. We think this should be included as a matter of urgency, both in terms of environmental impact from the SSSI and to the SSSI. It should be mentioned that para. 1.16 would apply to any planning application near an SSSI.
3. We have picked up a number of typos in the document which need correcting:
 - a. P.6 COR 2 c) end of paragraph: **Adopted 28 should be Adopted 2008**

- b. P.11 Subtitle Landscape Character Assessment framework – the ‘f’ of ‘framework’ should be upper case.
- c. P.28 5.10 in the ninth line, ‘of the landscape is repeated’.
- d. P.83 last line ‘no’ should be ‘not’.
- e. P.105 Guidance for Development section, penultimate bullet point: ‘no’ should be ‘not’.

sincerely,
(Chairman) Tiverton Civic Society

Yours
Fern Clarke (Secretary), Jeremy Salter

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