



3 February 2022

Planning Department  
Buckinghamshire Council  
By email: [DevControl.av@buckinghamshire.gov.uk](mailto:DevControl.av@buckinghamshire.gov.uk)

Dear ,

**Planning Application : 21/04925/APP Solar Farm at Wicken Farm Leckhampstead**

We are writing to object to the above referenced Outline Application for the installation and operation of a Solar Farm together with all associated works, equipment and necessary infrastructure.

The Buckinghamshire branch of CPRE, The Countryside Charity, as a long standing charity, has a role to protect the countryside from developments that do not meet acceptable planning guidelines. We have over 40,000 members and supporters nationally and well over 400 members in Buckinghamshire alone.

*Strategy for harnessing solar energy*

CPRE Bucks supports solar energy in principle, we broadly endorse the recommendations in the solar industry statement to which CPRE is a signatory, and our own position on the subject is set out in the Appendix; **but this is an inappropriate scheme because:**

- **It is contrary to the Government's previous commitment to the 'focus of [solar] growth to be on domestic and commercial roof space and previously used land'** (2013 Solar PV Roadmap; 2014 Solar Strategy). We have recommended to government that there should be "a stronger presumption against solar development on agricultural land of grades 1-3a" (the land in this application is Grade 3a and 3b)
- It would **lose valuable agricultural land for growing crops**, which is already insufficient in this country, leading to a need to import more food (with the consequential impact on carbon emissions and sustainability).
- The new Environment Act (2021) requires that grants of planning permission in England should be **subject to a condition to secure that the biodiversity gain objective is met**. There is insufficient information in the application to determine how this requirement will be met. In particular, the impact of

Chair  
Paula Buck



large solar farms on the wildlife is so far inconclusive, but there is evidence that they do have a detrimental impact on the local natural environment that needs to be managed. One study suggested: *“Solar installations, on the scale needed to supply power grids, are massive by necessity, transforming the lands where they’re located into a new kind of built environment. They can alter everything from sun exposure to moisture to surface temperatures. This can have unintended and unexpected impacts on local plants, animals, and even the area’s microbiome.”* (Karen Tanner, a researcher at University of California, quoted in Vox.com). A review of the ecological impacts of solar farms, mitigation solutions and opportunities for biodiversity enhancement by BSG Ecology noted that *“solar farms cause changes in micro-climate, demonstrated at Westmill solar park in the UK, where arrays caused both seasonal and daily changes in soil and air conditions. In summer, areas under panels were up to 5.2°C cooler, and drier compared to gap and control areas, whereas gap areas were 1.7°C cooler in winter relative to array and control areas. Daily variations in temperature and humidity were reduced in summer under the arrays. The study found that both species diversity and biomass were lower and attributed this to differences in micro-climate and how vegetation was managed”*. It also noted that: *“Photovoltaic panels shade the land while blocking some areas from rainfall and dousing others with heavy runoff. This changes the growing conditions for plants, with implications for other connected species”*.

- According to MAGIC (which provides geographic information about the natural environment from across government), at least half the land in this application is a Countryside Stewardship Agreement Management Area (Mid Tier). The Countryside Stewardship Scheme (CSS) is a competitive and targeted scheme which funds projects to restore habitats, improve water quality and woodland, reduce flood risk, protect landscapes, and provide year-round food and shelter for pollinators, birds and other wildlife. The Mid Tier of Countryside Stewardship offers five-year agreements for environmental improvements in the wider countryside, such as reducing diffuse water pollution or improving the environment for birds, pollinators and farm wildlife. Guy Thompson, Natural England’s Chief Operating Officer, said: *“Through Countryside Stewardship, farmers and land managers have an important role to play in protecting and improving England’s diverse landscapes and the wildlife that inhabit them.”* **In our view, a large scale solar farm is not compatible with the aims of the CSS, which appears to apply to at least half the land in this application.**



The countryside charity  
Buckinghamshire

[www.cprebucks.org.uk](http://www.cprebucks.org.uk)

We therefore strongly object to this application and urge the Council to refuse it.

Yours sincerely

Chair  
Paula Buck

Registered charity number 1163356  
Company number 9186100

## APPENDIX A: CPRE Position on Solar Energy

CPRE's position as follows:

We have made the following recommendations to the government:

- a sequential approach to location, with demand management/roofs/brownfield at the top, and higher quality farmland at the bottom;
- stronger requirements for individual and cumulative landscape impact;
- 20-year time limit conditions to challenge the emerging idea that 40 years is a temporary land-use.

In an article in The Telegraph, commenting on controversial plans for large scale solar farms on agricultural land, Paul Miner, head of land use and planning at CPRE, the countryside charity, said:

*'While we support increases in renewable energy generation, there are serious concerns about the lack of a strategically planned, brownfield first approach to solar. This is particularly the case when agricultural land appears to be targeted first, before any thought is given to more appropriate sites.'*

*'To be clear, switching to renewables is vital and solar is an important part of the mix. That's why we need to be smart in our approach. It makes no sense to let the countryside become a patchwork quilt of solar panels, generating huge public opposition, when no one would bat an eyelid if they were put on the roof of every warehouse in the country.'*

*'Indeed, many people would be delighted at the prospect of hundreds of thousands of industrial and commercial units becoming a modernised network of rooftop renewable energy. There are workable solutions to both protect and enhance the countryside at the same time as upgrading our electricity network. What we now need is a proper plan.'*

Whilst we expect utility-scale solar farms to come forward through the National Infrastructure Projects (NSIP) regime, this needs firmer direction as to a sequential approach, as made clear in the Solar PV Roadmap and the Solar Strategy. We therefore object to the current locational guidance to applicants ('factors influencing site selection': section 2.48) which is both unclear and unhelpful, in particular in relation to agricultural land classification and land type (see para. 2.48.13 et seq.). In particular, we suggest **a stronger presumption against solar development on agricultural land of grades 1-3a.**

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