

# WHITEHEAD PLANNING

Town Planning Consultancy

## Planning Statement

**34Kw ground mounted solar pv array for domestic use**

**At**

**Pineapple Farm Moditonham Botus Fleming Saltash PL12 6NN**

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**RTPI**

mediation of space · making of place

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**1. Introduction**

1.1 My name is Peter Whitehead. I am a planning consultant, and have traded under the name 'Whitehead Planning' since setting up in private practice in 2008. I have over 30 years of professional experience of town planning, having been continuously employed in the discipline since 1989. I am a chartered town planner and Member of the Royal Town Planning Institute (MRTPI).

1.2 The purpose of this Statement is four-fold:

1. It provides a brief introduction to the site and the proposed development;
2. It provides a précis of current local and national planning policies that have a bearing on the consideration of the application;
3. It provides a précis of other considerations that are relevant to the proposal; and finally,
4. It draws some brief conclusions regarding the proposal.

1.3 This Statement should be read in conjunction with the other components of the application as submitted.

## 2. The Site and Proposal

- 2.1 Pineapple Farm lies in the countryside at Moditonham, to the east of Botus Fleming. The property enjoys a river frontage onto Kingsmill Lake (part of the Tamar estuary) to the south, and is enclosed to the north and east by a single-track lane that leads down to Moditonham Quay. Fields lie to the west and, partly, to the south.
- 2.2 The property comprises a single dwelling, together with a range of outbuildings and a paddock, which slopes gently down from north to south. Although described as a farm, no agricultural activity is undertaken on the property, or would it viable to do so given the modest land holding. It is understood that the paddock was last used for grazing horses some years ago by one of the property's former owners.
- 2.3 The applicant, Michael Tapley, purchased the property in 2020, and is in the process of refurbishing and upgrading it.
- 2.4 Michael is keen to make Pineapple Farm energy self-sufficient and carbon neutral at least, and to this end is seeking to introduce solar pv panels. He has considered and discounted adding solar pv panels to the roof of the farmhouse and outbuildings for a number of reasons, both aesthetic and practical.
- 2.4 In his view, a more logical and efficient solution is to locate a ground-mounted PV solar array in the paddock, immediately to the west of the redundant stable block. His rationale is that the paddock is too small to be put to any viable agricultural use, but is ideally suited to harvest green energy to meet the property's domestic needs – and indeed, if possible, to export surplus to the grid.
- 2.5 The proposed solar pv array comprises two rows of panels mounted on metal frames, angled and orientated to face south to benefit from maximum solar exposure. The posts supporting the frames will be driven into the ground, avoiding any use of concrete footings or any permanent groundworks. The solar array is thus an impermanent, temporary and reversible form of development, allowing the land to revert to its former state if and as required. Indeed, even during the lifetime of the array, the area between and around the two rows of panels will be left as pasture.
- 2.6 The generating capacity of the array (34Kw) has been determined to meet the domestic needs of Pineapple farm going forward, including the ability to charge two electric cars. Any surplus energy produced would be exported to the grid.
- 2.7 A number of photographs of the site are produced as Appendix 1 to this Statement. These clearly show that the solar pv array will be virtually invisible from all points outside the site, given the slope of the land and screening to the

property boundaries.

### 3. The Development Plan and Other Material Considerations

#### National Policy

- 3.1 The National Planning Policy Framework (NPPF) (July 2021) and complementary National Planning Practice Guidance (NPPG) comprise the government's national planning policy and guidance.
- 3.2 Paragraph 7 of the NPPF sets out that *"The purpose of the planning system is to contribute to the achievement of sustainable development."*
- 3.3 Paragraph 8 of the NPPF explains that, in a planning sense, sustainable development has three overarching objectives; an economic objective, a social objective and an environmental objective. It explains that these three objectives are interdependent and need to be pursued in mutually supportive ways, so that opportunities can be taken to secure net gains across each of the different objectives.
- 3.4 Paragraph 11 of the NPPF sets out a presumption in favour of sustainable stating:-  
*"...For decision-taking 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."*
- 3.5 Paragraph 2 of the NPPF also identifies the primacy of the development plan, advising that *"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions..."* The planning law referred to in this paragraph is s38 (6) of the Planning and Compulsory Purchase Act 2004 and s70(2) of the Town and Country Planning Act 1990 (as amended).
- 3.6 Further references will be made to the NPPF throughout this Statement.

The Development Plan

- 3.7 For the purposes of paragraph 2 of the NPPF, the development plan in this case comprises the Cornwall Local Plan (2016)(CLP).
- 3.8 The following policies of the CLP are relevant to the consideration of this application:-
- Policy 1 - Presumption in favour of sustainable development
  - Policy 2 - Spatial Strategy
  - Policy 14 - Renewable and low carbon energy
  - Policy 16 – Health and wellbeing
  - Policy 23 - Natural environment
  - Policy 24 – Historic environment
  - Policy 26 - Flood risk management and coastal change
  - Policy 27 - Transport and accessibility

Other Material Considerations

- 3.9 The NPPF and complementary National Planning Practice Guidance (NPPG) are important material considerations. These will be referenced where necessary in this Statement.
- 3.10 The site lies within the Tamar Valley Area of Outstanding Natural Beauty. The AONB Management Plan is therefore a material consideration.

#### 4. Planning Issues

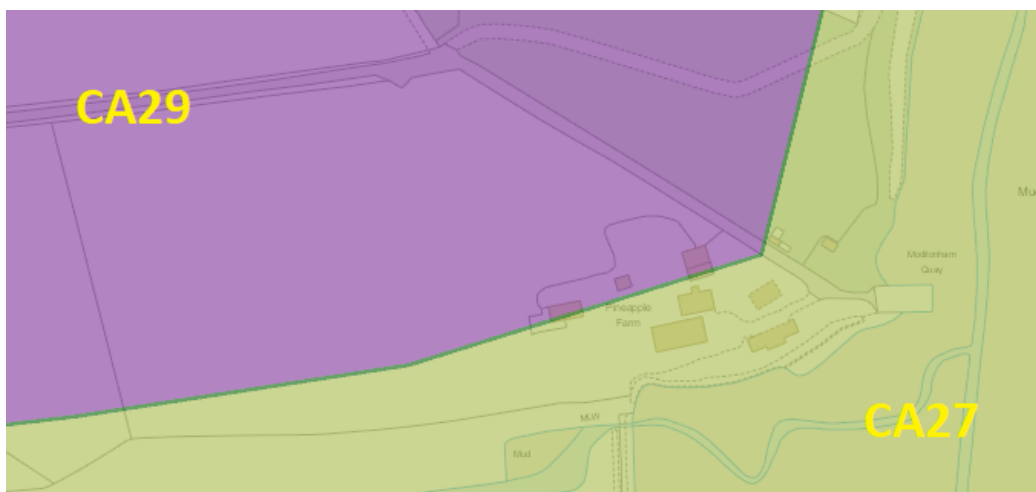
- 4.1 The government's stance on the delivery of renewable energy projects is set out in para 152 of the NPPF which states:  
"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."
- 4.2 Para 155 is also of note, stating:  
"To help increase the use and supply of renewable and low carbon energy and heat, plans should:  
a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);  
b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and  
c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers."
- 4.3 Attention is also drawn to para 158, which states:  
"When determining planning applications for renewable and low carbon development, local planning authorities should:  
a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and  
b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas."
- 4.4 Cornwall Council's stance on renewable and low carbon energy is set out in Policy 14 of the CLP which begins:  
"1. To increase use and production of renewable and low carbon energy generation development proposals will be supported that:  
a. maximise the use of the available resource by deploying installations with the greatest energy output practicable taking into account the provisions of this Plan."

- 4.5 It can only be concluded that the government's emphasis on the delivery of renewable energy projects will be further strengthened following the 26th UN Climate Change Conference of the Parties (COP26).
- 4.6 That said, it is recognised that the infrastructure and apparatus necessary to produce green energy can itself have adverse impacts, notably, on occasion, an adverse landscape or visual impact, and the consideration of applications for renewable energy projects thus necessitates a balancing exercise, vis-à-vis the three objectives of sustainable development.
- 4.7 In this case, it is recognised that Pineapple Farm adjoins the Tamar estuary, and lies within/within the zone of influence of the Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex Special Protection Area. The development proposed is, however, inert, comprising factory-produced solar pv panels, cabling, etc., fitted to a metal supporting structure. The posts supporting the array are typically driven into the ground, and require no concrete foundations or permanent groundworks. The entire array is impermanent and can be removed from the site at the end of its life. For these reasons, it is difficult to foresee that the development will have any direct or indirect effect on these habitats, or that the specialist advice of an ecologist is required. Indeed, it could be said that the continued use of the site for agriculture (and use of fertilisers, herbicides and pesticides) has the potential for greater impact upon the SAC and SPA.
- 4.8 For these reasons, it is submitted that the proposal is consistent with Policy 23 of the CLP insofar as it requires that "Development should conserve, protect and where possible enhance biodiversity and geodiversity interests and soils commensurate with their status and giving appropriate weight to their importance."
- 4.9 Turning to consider the landscape and visual impact of the proposal, attention turns again to Policy 23 of the CLP, 23(1) which sets out that "Development proposals will need to sustain local distinctiveness and character and protect and where possible enhance Cornwall's natural environment and assets according to their international, national and local significance."
- 4.10 In this case, the site lies within a nationally-designated landscape; the Tamar Valley Area of Outstanding Natural Beauty (AONB).
- 4.11 The 'great weight' given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty is set out in para 176 of the NPPF; and it is accepted that both national policy and local policy set a high bar for all new development within AONBs.
- 4.12 Policy 23(2)(a) of the CLP covers development in AONBs and states:  
"Great weight will be given to conserving the landscape and scenic beauty within or affecting the setting of the AONB. Proposals must conserve and enhance



the landscape character and natural beauty of the AONB and provide only for an identified local need and be appropriately located to address the AONB's sensitivity and capacity. Proposals should be informed by and assist the delivery of the objectives of the Cornwall and Tamar Valley AONB Management Plans including the interests of those who live and / or work in them."

- 4.13 Policy 14 (renewable and low carbon energy) of the CLP is also of note. Para 2.94, which introduces the policy, sets out that "In Areas of Outstanding Natural Beauty (AONBs) wind and solar development should generally be very small scale in order that the natural beauty of these areas may be conserved."
- 4.14 Policy 14(4) then states "In and within the setting of Areas of Outstanding Natural Beauty and undeveloped coast, developments will only be permitted in exceptional circumstances and should generally be very small scale in order that the natural beauty of these areas may be conserved."
- 4.15 In this case, having regard to Policy 23, the proposal meets an 'identified local need'; providing heat and power for Pineapple Farm. With regard to Policy 14, the proposal is clearly of 'very small scale', being sized to meet the domestic needs of the property.
- 4.16 Turning to consider, the actual impact of the development on the landscape character and scenic beauty of the AONB, reference is drawn to the Landscape Character Areas (LCAs) set out in the Cornwall and Isles of Scilly Landscape Character Study. These show that Pineapple Farm straddles two LCAs, the northern part of the site falling within the Middle Tamar Valley (CA29) and the southern part of the site falling within the Lower Tamar and Tavy Rivers (CA27), as depicted on the Landscape Character Area map below:



- 4.17 The proposed solar pv array is to be sited more or less on the junction of these two LCAs, but falls just within CA29 (Middle Tamar Valley).

- 4.18 The landscape description and key characteristics of CA29 are stated as follows:  
“Description

River valley with picturesque views over water, gently undulating farmland and extensive woodland. Gorge-like effect of river system, especially where it has cut through the granite ridge. The south-flowing river follows a highly sinuous and changing course, often with very steep wooded sides. Its generally short tributary valleys have a complex folded landscape character and are barely visible from adjoining high land, especially in the south. Further north the topography becomes more gentle and open, with a more typical river valley aspect.

Key Landscape Characteristics

River valley, narrow in parts, meanders in tight loops between steep wooded slopes, with dramatic gorge through granite ridge.

Inner meanders support wider floodplains with improved farmland behind earth dykes and outer fringe of Coastal Saltmarsh and Reedbeds.

Extensive mixed broadleaved and coniferous woodland on valley sides, with improved grassland and pasture on lower lying areas and pockets of arable or horticultural land on higher valley edge.

Medieval quaysides and 19th mining settlements.

Core of Tamar WHS area with mine spoil, engine houses and chimneys dominant features in the landscape.

Winding narrow sunken lanes and ‘packhorse’ paths give access to former quays.”

- 4.19 In this case, the development comprises a modest ground-mounted solar pv array with two parallel rows of panels 41.3m in length. The max height of the array (i.e the rear of the panels) will be approximately 2m above existing ground level. The height of the arrays will be lower in the summer, as the pv panels are designed to pivot and track the sun (and thus maximise efficiency).
- 4.20 The development requires no reprofiling or remodelling of the site, and involves no permanent buildings or construction. The array will merely be sited on the existing slope of the land, with the posts supporting the array driven into the ground. As stated, the development itself is impermanent, and removeable. I am aware that Cornwall Council has granted permissions for ground-mounted solar pv arrays for temporary periods, e.g. for 25 years, confirming the Council's view that such development is considered to be temporary and impermanent.
- 4.21 Accordingly, the development will have no material or lasting impact on landscape character.
- 4.22 With regard to consideration of the proposal's visual impact, and impact upon the area's scenic beauty, the photographs produced in Appendix 1 below clearly demonstrate that the site is extremely discrete in the landscape, being concealed both by the slope of the land and by thick screening to the site boundaries.

Accordingly, the solar pv array will not be apparent in any views gained from the lane to the north or east, or from the short section of public footpath leading onto Morditonham Quay. It is acknowledged that the Tamar estuary is used by the public for recreational sailing etc., though little use is understood to be made of Kingsmill Lake, which is shallow and only navigable an hour or two either side of high tide. In any event, given the siting of the solar pv array, offset to the north-west of Pineapple Farm's frontage with Kingsmill Lake, and screened by both the rising land and intervening trees and hedges, it is not considered that the solar pv array will be apparent in any short or long-range views gained from the lake/estuary. Hedge planting to the north (rear) boundary of the array will further screen it from view.

- 4.23 Indeed, the only vantage points offering a view of the solar pv array are considered to lie with the boundaries of the applicant's property, Pineapple Farm. This is private land, and no public right of way crosses it.
- 4.24 For these reasons, this small-scale domestic installation will have no material impact upon the area's natural scenic beauty, and the proposal accords with the requirements of Policies 14 and 23 of the CLP set out above.
- 4.25 Finally, to return briefly to the environmental objective of sustainable development, it should of course be recognised that this goes beyond the consideration of the aesthetics of landscape beauty, and also takes account of the impact of renewable energy production on combatting climate change. In this regard, para 158 of the NPPF reminds us that "even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions."

## 5. Conclusions

- 5.1 The key issue in the consideration of this application is whether the proposal amounts to sustainable development. Paragraph 7 of the NPPF identifies that there are three mutually dependant objectives to sustainable development; it should fulfil an economic role, a social role and an environmental role.
- 5.2 In this case, the proposal will clearly meet the economic objective, providing employment during the construction process and, by creating free, green energy, avoiding the costs of fossil fuel production and, indeed, the costs of climate change.
- 5.3 The proposal will meet the social objective by supporting employment during the construction process and thereafter for maintenance purposes. Moreover, through the production of green pollution-free energy that helps cut greenhouse gas emissions and combats climate change, the proposal will support improved health and wellbeing.
- 5.4 Finally, in terms of the environmental objective, it has been seen that the proposal will have no material impact upon landscape character or the area's scenic beauty as it is enjoyed by the general public. The proposal is, of course, also intended to create green energy to help combat climate change; and para 158 of the NPPF reminds us that "even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions."
- 5.5 Having regard to the above, the proposed development should clearly be regarded as sustainable development in accordance with para 8 of the NPPF. The development also offers net gains across each of the three objectives (economic, social and environmental) as per the requirement of this paragraph.
- 5.6 It has also been clearly demonstrated above that the proposal complies with the policies of the Cornwall Local Plan (2016), which comprise the extant development plan.
- 5.7 Given the foregoing, mindful of s38(6) and the presumption in favour of development that accords with the development plan as well as the presumption in favour of sustainable development set out at paragraph 11 of the NPPF, it is trusted that the Council, will approve this application.

**Peter Whitehead BSc (Hons) PDip UP MRTPI**  
**November 2021**



APPENDIX 1 – Photographs



Aerial photo of Pineapple Farm, showing the farmhouse and outbuildings to the east, and the approximate location of the proposed solar pv array "PV" in the south-east corner of the paddock. Nos. 1-7 inc denote the locations of the photographs produced below.



Photo 1: The paddock, looking west. The proposed solar pv array will be sited in the foreground.





Photo 2 (above): Looking east from the paddock, towards the former stables and farmhouse(centre). The proposed solar pv array will be sited in the foreground.



Photo 3 (above) view looking south from the lane that adjoins Pineapple Farm to the north. The existing hedge prevents views into the field beyond – and will thus screen the solar pv array from view.





Photo 4: view from lane besides gateway to northern boundary. Again, views into the field are limited by the hedge.



Photo 5: view from the lane to the east boundary of Pineapple Farm, looking south-west, towards the site of the solar pv array. Again, views are filtered through trees and hedging.





Photo 6: View from the eastern gateway into Pineapple Farm, looking west. From here, views of the solar pv array are screened by buildings in the foreground.



Photo 7: looking north-west towards the site of the solar pv array from the estuary. From here, the pv array will be screened by trees, and by local topography.