

St Dennis Parish Council formally object to the proposed **Trevice Solar Farm** on the grounds of **significant environmental, landscape, economic, transport, and heritage concerns**. A thorough review of the **Ecological Impact Assessment (EclA), Landscape & Ecology Management Plan (LEMP), Flood Risk Assessment, Transport Plan, and other associated reports** reveals **critical deficiencies** in the proposal.

Additionally, **local knowledge** highlights serious risks regarding **flooding, traffic safety, loss of historic and ecological assets, and the impact on rural communities**. The proposed development **fails to comply with Cornwall Local Plan policies** and does not **adequately address community concerns**.

We object on the following grounds:

Environmental and Landscape Impact

Visual Impact & Harm to Landscape Character

Issue:

- The proposed development will **industrialise 61.5 hectares of open countryside**, significantly altering the **rural character**.
- The site is designated as **open countryside**, and its development would **contradict national and local policies** aimed at protecting rural landscapes.
- Local residents note that **existing solar farms have already changed the landscape**, and this development **would contribute to cumulative harm**.
- The proposed mitigation (hedgerows and tree planting) **will take years to mature**, leaving the site **exposed to public views**.
- This area serves as **the last remaining corridor of agricultural land between the incinerator and the tips at Gaverigan**, making its **preservation crucial** for maintaining the rural character of the region.
- The loss of this corridor would **irreversibly industrialise the landscape**, eroding **one of the few remaining green spaces in this area**.

Policy Conflicts:

- **Cornwall Local Plan (CLP) Policy 23 (Natural Environment):** Requires protection of **landscape character** and scenic beauty.
- **CLP Policy 12 (Design):** Development must respect **local distinctiveness** and avoid **visual harm**.
- **NPPF Paragraph 170(b):** Requires planning decisions to **recognise the intrinsic character and beauty of the countryside** and protect **valued landscapes**.
- **NPPF Paragraph 174:** States that planning should contribute to and enhance the **natural and local environment** by protecting the countryside.
- **CLP Policy 2 (Spatial Strategy):** Seeks to **preserve open countryside** and maintain the distinct character of Cornwall's rural areas.

- **Requested Action:**
A revised **Landscape and Visual Impact Assessment (LVIA)** with stronger mitigation measures.

Loss of Green Space & Open Countryside

Issue:

- The proposal **permanently removes agricultural land**, replacing open fields with **industrial-scale infrastructure**.
- **Local walkers and residents** who frequently use this landscape will **lose access to scenic countryside**.

Policy Conflicts:

- **NPPF Paragraph 174:** Requires development to **protect and enhance valued landscapes**.
- **CLP Policy 2 (Spatial Strategy):** Aims to **preserve Cornwall's open countryside**.

- **Requested Action:**
The **site should be reconsidered**, favouring **brownfield alternatives**.

Harm to Existing Trees & Hedgerows

Issue:

- The removal of **32 meters of historic hedgerows** will fragment wildlife corridors.
- Residents have noted that **some hedgerows already provide natural screening**, and their removal would **exacerbate visual impacts**.

Policy Conflicts:

- **Hedgerows Regulations 1997:** Protects important hedgerows from removal.
- **CLP Policy 23:** Requires hedgerows to be **retained and enhanced**.

- **Requested Action:**
A **hedgerow protection and replanting strategy** with a **commitment to net gain in hedgerow length**.

Agricultural Land & Rural Economy

Permanent Loss of Agricultural Land

Issue:

- The site includes **good-quality agricultural land**, permanently removing it from food production.

- **Local farmers** have raised concerns that **land loss will impact livestock grazing and crop production.**

Policy Conflicts:

- **NPPF Paragraph 174:** Seeks to **safeguard the best and most versatile agricultural land.**
- **CLP Policy 5 (Business & Tourism):** Protects **land vital for rural industries.**
- **Requested Action:**
The council should **require evidence** that **brownfield or lower-quality land has been considered first.**

Conflict with Cornwall's Rural Economy Strategy

Issue:

- The development **contradicts Cornwall's rural economic policies** by prioritising energy production over **agriculture and local employment.**

Policy Conflicts:

- **CLP Policy 2:** Requires development to support **economic resilience.**
- **Requested Action:**
A **local employment and economic impact assessment** should be required.

Highways & Transport Concerns

Road Safety Risks & Unsuitable Site Access

Issue:

- The **site entrance is on a high-speed road**, and construction traffic will **use narrow rural roads**, increasing accident risks.
- **Local residents have already observed near-misses at this location**, and heavy construction vehicles **will worsen safety risks.**

Policy Conflicts:

- **NPPF Paragraph 110:** Requires **safe and suitable access.**
- **NPPF Paragraph 111:** Planning permission should be refused if development results in **unacceptable highway safety impacts.**
- **CLP Policy 27:** Requires transport plans to **prevent road hazards.**
- **Requested Action:**
A **Road Safety Audit** with improved site access plans.

Impact on Grade II Listed Single-Track Bridge

Issue:

- The main construction route crosses a **Grade II listed bridge**, already damaged by **two recent accidents**.
- **Local knowledge confirms that the bridge is already at risk**, and **HGVs may cause irreversible damage**.

Policy Conflicts:

- **NPPF Paragraph 199**: Requires conservation of heritage assets.
 - **Cornwall Local Plan (CLP) Policy 24 (Historic Environment)** – States that developments should conserve and enhance Cornwall's historic environment, including non-designated assets.
- **Requested Action:**
A **structural assessment** must confirm the bridge's suitability.

Drainage & Flooding Risks

Issue:

- The **Flood Risk Assessment lacks sufficient mitigation** for increased runoff.
- **Local residents confirm that the area has suffered frequent flooding in recent years**, turning roads into **streams during heavy rain**.

Policy Conflicts:

- **NPPF Paragraph 159**: Requires developments to **not increase flood risk**.
 - **NPPF Paragraphs 159-162**.
 - **CLP Policy 26 (Flood Risk Management). Disruption to Natural Drainage Patterns**: The proposal fails to protect natural watercourses, conflicting with **CLP Policy 23**.
- **Requested Action:**
A **revised flood risk strategy with sustainable drainage systems (SuDS)**.
- **A detailed flood modelling analysis** to assess **off-site impacts**, which is required given the **proven history of flooding in Trerice Terrace**.

Impact on Wildlife & Protected Species

Issue:

- The site contains **badgers, bats, dormice, and birds**, yet **mitigation plans are weak**.
- **Local wildlife experts have raised concerns that fencing will block key wildlife corridors**.

- The **Ecological Impact Assessment** highlights **significant risks to protected species, priority habitats, and biodiversity**. The report **fails to provide sufficient mitigation measures**, and the proposal **does not demonstrate compliance** with national and local biodiversity policies.

Policy Conflicts:

- **Conservation of Habitats & Species Regulations 2017:** Requires **stronger protections for European Protected Species**.
 - **Protection of Badgers Act 1992** – Protects badger setts and prohibits disturbance.
 - **NPPF Paragraph 180(a)** – Requires planning decisions to avoid harm to protected species.
 - **Cornwall Local Plan Policy 23 (Natural Environment)** – Requires developments to mitigate biodiversity loss.
 - **Wildlife and Countryside Act 1981** – Protects dormice and their habitats.
- **Requested Action:**
A **revised ecological mitigation plan** with long-term monitoring commitments.

Impact on Archaeological & Historic Assets

Issue:

- The site contains **Iron Age and medieval remains**, but **trial trenching was incomplete**.
- **Local historians have noted that the area has a strong archaeological significance**, which may be lost if excavation is not thorough.

Policy Conflicts:

- **NPPF Paragraph 205:** Requires the **preservation of archaeological sites**.
- **Requested Action:**
A **full archaeological investigation before approval**.

Lack of Meaningful Local Benefit

Issue:

- No **guaranteed local employment** or **energy cost reduction** for residents.
- **Statkraft's promise of a 24% Biodiversity Net Gain is unverified**, raising doubts about **long-term benefits**.

Policy Conflicts:

- **CLP Policy 4:** Requires **appropriate community benefits**. **Cornwall Climate Emergency DPD (Policy RE1):** Encourages **community ownership or direct benefits** from renewable projects.
- **NPPF Paragraph 157:** States that energy projects should consider **community energy initiatives**.
- **UK Government Consultation on Community Benefits (2023):** Suggests developers should explore models where local residents see **financial or energy-related benefits** from hosting renewable projects.
- **NPPF Paragraph 180(d)** – Requires measurable biodiversity enhancements.
- **Cornwall Local Plan Policy 23 (Natural Environment)** – Requires developments to mitigate biodiversity loss.

➤ **Requested Action:**

A legally binding community benefit agreement.

In addition to the points raised above, we wish to highlight that in our opinion the proposed development does not adequately address the issues below.

Noise & Disturbance, Amenity Impact

- **Construction Noise & Disturbance:** The project poses unacceptable noise levels, contrary to **NPPF Paragraph 185**.
- **Operational Noise from Battery Storage Units (BESS):** There is no assurance that the noise impact will be within acceptable limits, violating **CLP Policy 16 (Health & Wellbeing)**.

Lack of Clear Decommissioning Plan

- **Long-Term Uncertainty About Restoration:** There is no legally binding restoration plan, contradicting **NPPF Paragraph 180**.
- **Concerns About Leftover Infrastructure:** The absence of a remediation strategy raises concerns about land degradation post-development.

We trust that the Council will recognise the significant shortcomings of this application and take appropriate action in line with national and local planning policies.