AAH consultants

PLANNING SUPPORTING STATEMENT

FULL APPLICATION FOR THE CONSTRUCTION AND OPERATION OF A 48MW SOLAR FARM COMPRISING GROUND MOUNTED SOLAR PHOTOVOLTAIC ARRAYS TOGETHER WITH ASSOCIATED INFRASTRUCTURE AND LANDSCAPING

LAND NORTH OF ROMAN BANK AND EAST OF MIDDLE MARSH ROAD AT RED HOUSE FARM, HOLBEACH BANK, SPALDING, PE12 8BY

GRID REFERENCE: X536995 Y328849

January 2023

Planning Supporting Statement

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1.0 Introduction

1.1 This Planning Supporting Statement (PSS) has been prepared on behalf of the applicant by AAH Consultants in support of full planning application for the construction of a temporary 48MW solar farm including associated infrastructure and landscaping at land north of Roman Bank and east of Middle Marsh Road at Red House Farm, Holbeach Bank, Spalding, PE12 8BY (Grid Reference X536995, Y328849).

1.2 AAH Planning Consultants are members of the Royal Town Planning Institute (RTPI) and the Institute of Environmental Management and Assessment (IEMA).

1.3 This PSS assesses the proposed development against the relevant development plan policies, which need to be considered in support of this application for the development of the site for a solar farm and other material considerations. It demonstrates how the proposed development has been designed to achieve compliance with the relevant development plan policies and sets out the significant and material benefits that will be delivered as part of the scheme.

1.4 This application is accompanied by a full suite of plans, including the design and layout of the proposal, which set out the proposed location of arrays and how the site will be developed. This PSS should be read in conjunction with all of the other submission documents, including the Design and Access Statement.

2.0 Site Description and Context

2.1 The application site measures approximately 80 hectares of greenfield land located between the villages of Holbeach St Marks, Holbeach Bank and Holbeach Hurn. The site is bound by Middle Marsh Road to the west, with farmsteads and isolated residential properties located on the western side of Middle Marsh Road, opposite the site. Roman Bank borders the southern boundary of the wider site and open countryside lies to the north and east, with Eastern Road located beyond the eastern boundary. The site boundaries are largely defined by drainage ditches which demarcate existing field boundaries within the site also.

2.2 The site contains 1 and 2 Bass Cottages (semi-detached dwellings) and the farmstead of Red House Farm located along the farm track/lane to the south of the Site, connecting to Roman Bank and Middle Marsh Road. Overhead power lines and associated pylons run through the northern section of the site, in a north west to south east orientation; an underground pipeline with an associated 25m exclusion zone runs centrally through the site in an east to west direction. The site and the surrounding areas are characterised by open, flat land with large scale industrial agriculture occupying drained fens with big skies and open views.



Figure 2.1: Aerial Image of the Site

2.3 The site is located within Flood Zone 3. The River Welland lies approximately 4.5km to the north-west of the site. There are several ditches within the Site used to drain the farmland. The site contains large, irregular shaped open arable fields, bound and defined by a network

of drainage ditches, which also run along the northern and eastern site boundaries, which are used to drain the farmland.

2.4 The site is not located within a local or national ecological designation. The Wash SSSI, SPA, SAC, RAMSAR site and NNR is located approximately 4.8km to the north, and the site falls out with the Impact Risk Zone for the SSSI, although it is noted that the site is located in close proximity to an area that is likely to be sensitive by virtue of the avian species located on or around the location. The site is not located within a Conservation Area and contains no Listed Buildings, with the nearest listed buildings located within the settlements of Holbeach St Marks and around Penny Hill. It is understood, however, that the route of a medieval sea bank crosses the proposed site towards the south end, around the area of Red House Farm.

Planning History

2.5 There has been a recent planning application for Red House Farm (Application Ref: H09-0213-20) for the retrospective use of the site for the keeping of more than six dogs. Permission was granted on 2nd October 2020. There are several historic applications related to residential extensions of Red House Farm in 2007 and 2006, briefly detailed below:

- H09-0677-07- Proposed Conservatory – Approved
- H09-0953-06 - Single-storey 'granny annexe' extension – Approved
- H09-0268-06 - Extension to form annexe – Refused

3.0 Sustainability, Need and Locational Requirements

Sustainability

3.1 The scientific evidence of climate change is overwhelming and identifies that rising greenhouse gas emissions threaten the stability of the world's climate. The continuing production of greenhouse gases and carbon dioxide, in particular, is considered to be contributing to the increasing rate of climate change.

3.2 In the UK, the government's aim is to significantly reduce emissions and create a low carbon economy. As a significant proportion of carbon emissions are from the production of energy, energy policy must play a major part in meeting the challenges of climate change. There is continued support from the government for the development of low carbon and renewable technologies to generate electricity. Furthermore, an increase in renewable energy also supports national strategies to reduce the reliance on imported fossil fuels and an increase in the security of overall energy supply.

The Climate Change Act 2008

3.3 The Climate Change Act 2008 created a new legal framework to reduce GHG (Greenhouse Gas) emissions, with a target for their reduction to at least 80% below 1990 levels by 2050 at its heart. This target was reinforced in 2019, with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 raising the target from 80% to 100% - in effect a 'Net Zero' target, as recommended by the Committee on Climate Change. The UK was the first major economy to set itself such an ambitious target, honouring its commitment to the 2015 Paris Agreement in which signatories from around the globe pledged to reach 'Net Zero' emissions during the second half of the twenty-first century.

National Policy Statement for Renewable Energy Infrastructure (EN-3)

3.4 The National Policy Statement for Renewable Energy Infrastructure EN-3 was published in July 2011, with a further draft published in September 2021. Paragraph 1.1.1 of EN-3 underlines the importance of the generation of electricity from renewable sources by stating:

'Electricity generation from renewable sources of energy is an important element in the Government's transition to a low-carbon economy. There are ambitious renewable energy

targets in place, and a significant increase in generation from large scale renewable energy infrastructure is necessary to meet the 15% renewable energy target.'

3.5 The proposed development offers the opportunity to harness solar power at a utility-scale, thus providing clean, affordable and reliable energy to consumers. The proposed development is considered to comply in principle, as it would contribute to the UK Government's objective to transition to a low carbon economy and increase the energy generation of large-scale renewable energy infrastructure.

Energy Act 2013

3.6 The Energy Act was granted assent on 18th December 2016. Through the Energy Act, the Government aims to further its objectives to meet the UK's decarbonisation and renewable targets. The Bill will establish a legislative framework for delivering secure, affordable and low carbon energy.

UK Solar PV Strategy Part 1: Road Map to a Brighter Future (2013)

3.7 Part 1 of the UK Solar PV Strategy was published in October 2013 and sets out four guiding principles which form the basis of the UK Government's strategy for solar PV. These principles are:

- *Support for solar PV should allow cost-effective projects to process and to make a cost-effective contribution to UK carbon emission objectives in the context of overall energy goals;*

- *Support for solar PV should deliver genuine carbon reductions that help meet the UK's target of 15% renewable energy from final consumption by 2020;*

- *Support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity, and provide opportunities for local communities to influence decisions that affect them;*

- *Support for solar PV should assess and respond to the impacts of deployment on grid systems balancing, grid connectivity, and financial incentives.*

3.8 Part 1 establishes the principles for solar PV deployment in the UK and states that solar PV can be deployed in a variety of locations, including on the ground on greenfield sites.

UK Solar PV Strategy Part 2: Delivering a Brighter Future (2014)

3.9 Part 2 of the UK Solar PV Strategy was published in April 2014 and focuses on the UK Government's ambition for the key market segments, how they will be realised through innovation and partnership and the benefits that this will bring for jobs and investment in the UK, in addition to vitally important emissions reduction.

3.10 Part 2 of the Strategy recognises, in respect of ground-mounted solar PV installations, the opportunities for greater clean energy generation and how solar farms can be beneficial for wildlife. Part 2 of the UK Solar PV Strategy also recognises there is a need for ground-mounted solar schemes to be well planned and screened and to avoid harm to biodiversity. It emphasises that innovation and clean energy are at the centre of the UK Government's economic plan. One of the key topics is the delivery of commercial and industrial on-site generation. With the falling costs due to technology innovation, there is an ambition for continuous growth in the solar PV capacity in line with the 2020 target for renewables.

UK Climate Emergency (2019)

3.11 In May 2019, a national climate emergency was declared by the UK Parliament. The Government pledged to set a new target of reaching Net Zero by 2050. The UK were the first country in the world to declare a climate emergency, and the vast majority of local authorities have now followed suit.

Energy White Paper (2020)

3.12 The Government announced plans to transition to net-zero by 2050 and achieve this through the "*clean energy technologies*". The White Paper stated that "*Decarbonising the energy system over the next thirty years means replacing – as far as it is possible to do so - fossil fuels with clean energy technologies such as renewables, nuclear and hydrogen*."

3.13 The White Paper went on to state that decarbonising the energy system can be achieved through generating clean electricity, which "*will become the predominant form of energy, entailing a potential doubling of electricity demand and consequently a fourfold increase in low-carbon electricity generation."*

3.14 To address this demand, the White Paper acknowledges that *"a low-cost, net-zero consistent system is likely to be composed predominantly of wind and solar"* with the need for *"sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net-zero emissions in all demand scenarios".*

3.15 The White Paper also sets out that by 2050, energy demand is likely to double as a result of increased uptake in electric vehicles and the electrification of heat, which in turn means there is a requirement for a fourfold increase in the amount of low carbon generation that is currently in the grid, in order to hit the net-zero target. Essentially, we need to speed up the rate of delivery of renewable and low carbon energy compared to current delivery rates.

South Holland District Council

3.16 South Holland District Council approved a new Climate Change Strategy in Spring 2022, which sets out the challenges and opportunities that climate change presents for South Holland, Boston and East Lindsey as they work towards the country's net-zero by 2050 target. The strategy sets out the context to current levels of carbon emissions across the area and identifies the key themes that are needed in order to achieve a more sustainable future for local communities. Information is also provided on how the Councils aim to deliver the strategy, working in partnership with public, private and third sector organisations through the establishment of a new South and East Lincolnshire Climate Action Network (SELCAN). The engagement plan also sets out how the Councils intend to communicate the work and success of delivery over the short and medium-term.

3.17 The new South and East Lincolnshire Climate Action Network (SELCAN) was launched in Spring 2022 to drive delivery of the Climate Change Strategy. Representatives from key sectors, including those representing public, private and third sector/communities are invited to join SELCAN with ongoing administrative support provided by the South and East Lincolnshire Councils Partnership.

Lincolnshire County Council Carbon Neutral 2050

3.18 At a full Council meeting in May 2019, Lincolnshire County Council passed a motion to commit to becoming carbon neutral by 2050. As a response to climate change and the 2050 target,

Lincolnshire County Council have developed a Green Masterplan, which sets out the guiding principles of how this challenge will be met. These guiding principles are:

- Don't waste anything
- Consider wider opportunities
- Take responsibility and pride

3.19 The Green Masterplan is also supported by the Initial Action Plan 2020 – 2025, which details the initial projects which will be developed to ensure national carbon reduction targets are met. The development of solar farms should be considered as a positive and proactive approach to reaching carbon neutrality by 2050.

Need

3.20 Paragraph 158 of the NPPF sets out that LPAs should not require applicants to demonstrate the overall need for renewable for low carbon energy. Notwithstanding this, it is important to recognise that there is a clear need for this development. The UK is legally bound through the Climate Change Act (2008) to cut greenhouse gas emissions by 80% by 2050, compared to 1990 levels. Furthermore, as a signatory to the 2015 Paris Agreement, the UK has committed to reaching 'Net-Zero' emissions during the second half of the twenty-first century

3.21 The Development would contribute towards meeting these requirements and would also be fully supported by energy policy as it would assist in replacing outdated energy infrastructure and moving to a low carbon economy.

Locational Requirements

3.22 Solar farm developments have very specific location requirements, which severely limits where they can be located. It is important that the Council understand from the outset that solar farms cannot simply be located anywhere.

3.23 Solar farms have to be located within close proximity of a viable grid connection that has sufficient capacity to import power that will be generated from the development. Suitable points of connections include a sub-station or a 132kv overhead power line. However, the ability to find connections with sufficient capacity is severely limited around the country.

3.24 When a suitable connection can be found, other factors need to be taken into consideration that impacts the viability and feasibility of a solar farm, particularly the distance from a sub-station. A solar farm could potentially be developed up to 2km from the point of the

connection; however, the level of efficiency reduces the further away from the connection. Furthermore, connection to the grid can become unfeasible if there is a requirement to cross third party land. Most solar farms are also connected to the grid via 'soft dig' methods as opposed to 'hard dig', which are actively avoided, and includes, for example, laying cable underneath roads.

3.25 Developers also seek to ensure that their sites avoid land with the most protective designations such as National Parks, Areas of Outstanding Natural Beauty, Site of Special Scientific Interest and Conservation Areas, which further limit where solar farms can be located.

3.26 In summary, there are very few sites where solar farms can be located when the above factors are taken into account.

4.0 Planning Policy

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Local Planning Authority (LPA) to determine planning applications in accordance with the Development Plan unless there are material considerations which indicate otherwise. Section 70(2) of the Town and Country planning Act 1990 provides that in determining applications, the LPA: "shall have regard to the provisions of the Development Plan, so far as material to the application and to any other material considerations."

National Planning Policy Framework (NPPF, 2021)

4.2 The revised National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. National Planning Practice Guidance (PPG) adds further context to the NPPF, and the two documents should be read together. The NPPF and PPG are both material considerations in determining planning applications.

4.3 Paragraph 2 of the NPPF confirms that: "*Planning law requires that applications for planning permission must 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*." Paragraph 3 clarifies that: "*The Framework should be read as a whole (including its footnotes and annexes)*."

The Presumption in Favour of Sustainable Development

4.4 Paragraph 7 identifies that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 sets out the environmental objective that the planning system should aim to meet to achieve sustainable development; it states that this includes moving to a low carbon economy.

4.5 Paragraph 11 of the NPPF provides the presumption in favour of sustainable development. For decision-taking, this states:

"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."

Decision Making

4.6 The NPPF states at Paragraph 38 that planning should be a creative exercise rather than being focused on scrutiny, stating that:

"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should…. work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."

Meeting the Challenge of Climate Change, Flooding and Coastal Change

4.7 Paragraph 152 states that 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 … support renewable and low carbon energy and associated infrastructure."*

4.8 Paragraph 155 states 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 hear customers and suppliers."*

4.9 The NPPF also is clear that there is no requirement for applicants to demonstrate the need for renewable energy development, stating that LPAs should not require applicants for energy development 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.

4.10 Paragraph 158 states that 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 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 also expect consequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas."*

Planning Practice Guidance

4.11 In terms of renewable and low carbon energy, PPG (Paragraph: 001 Reference ID: 5-001-20140306) states that:

"Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable."

4.12 The PPG goes on to state (Paragraph: 013 Reference ID: 5-013-20150327) states that:

"where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays."

South East Lincolnshire Local Plan

4.13 South Hollands existing Development Plan is a joint local plan with Boston Borough Council and Lincolnshire County Council, known as the South East Lincolnshire Local Plan, and was adopted on 8th March 2019 and covers the period 2011-2039. The South East Lincolnshire Local Plan provides guidance as to the Council's policies, forming a basis against which all development proposals in the borough are decided.

4.14 The following Local Plan policies are pertinent for the development of this site for a Solar Farm:

- Policy 1: Spatial Strategy Part D relating to the Countryside
- Policy 4: Approach to Flood Risk
- Policy 28: Natural Environment
- Policy 29: Historic Environment
- Policy 30: Pollution
- Policy 31: Climate Change Renewable Energy and Low Carbon Energy
- Policy 33: Delivering a more Sustainable Transport Network

5.0 Planning Assessment and Considerations

5.1 In determining planning applications, a Local Planning Authority (LPA) must have regard to Section 38 (6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Principle of Development

5.2 National policy sets out that in order to help increase the use and supply of renewable energy, local planning authorities should recognise the responsibility of all communities to contribute to energy generation from renewable or low carbon sources.

5.3 Chapter 14 of the NPPF outlines the positive approach that Council's should take in respect of new renewable energy developments. Paragraph 152 is integral to the assessment of the principle of development. It specifically references 'renewable and low carbon energy' as something that the planning system should support to transition to a low carbon future in a changing climate.

5.4 Paragraph 158 of the NPPF effectively outlines a presumption in favour of renewable energy developments, as there is now no requirement for applicants to demonstrate the need for such proposals, and as such, applications should only be refused where there would be significant harm as a result.

5.5 Paragraph 158 also sets out a presumption in favour of renewable energy developments, whereby such applications should be approved, providing it is demonstrated that the impacts of such proposals are acceptable or can be made acceptable. This statement will set out in that the impacts of the proposal are or can be made acceptable.

5.6 At a local level, Local Plan Policy Part D relates to development in the Countryside wherein development *'will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits."* Policy 31, Climate Change Renewable and Low Carbon Energy, supports renewable energy development such as solar farms subject to seven criteria. The Local Plan recognises the increasing need for South East Lincolnshire to

mitigate and adapt to climate change by, amongst other matters, the development of renewable energy systems.

5.7 The seven criteria detailed in Policy 31, Part B are:

"With the exception of Wind Energy the development of renewable energy facilities, associated infrastructure and the integration of decentralised technologies on existing or proposed structures will be permitted, provided individually or cumulatively, there would be no significant harm to:

1. *Visual amenity, landscape character or quality, or skyscape considerations;*

2. *Residential amenity in respect of: noise, fumes, odour, vibration, shadow flicker, sunlight reflection, broadcast interference, traffic;*

3. *Highway Safety (including Public Rights of Way)*

4. *Agricultural land take;*

5. *Aviation and radar safety;*

6. *Heritage assets including their setting; and*

7. *The natural environment.*

Provision should be made for post-construction monitoring and the removal of the facility and reinstatement of the site if the development ceases to be operational.

Proposals by a local community for the development of renewable and low-carbon sources of energy, in scale with their community's requirements, including supporting infrastructure for renewable energy projects, will be supported and considered in the context of contributing to the achievement of sustainable development and meeting the challenge of climate change and against criteria B 1-7."

The significant and demonstrable benefits to the proposal, and solar farms more widely, are set out in Section 6 of this Statement.

5.8 It is considered that the proposal is in accordance with all relevant policies of the Local Plan with the relevant criteria explored in this statement. Furthermore, the proposal will also contribute towards one of the strategic priorities for South East Lincolnshire. Strategic Priority 8 seeks *"to minimise the impact of and adapt to climate change by making more sustainable use of land and resources, reducing exposure to flood risk, promoting sustainable development and reducing human exposure to environmental risks."* In addition, Lincolnshire County Council have also committed to becoming carbon neutral by 2050; the proposed development will help the Council to achieve this aim.

5.9 The proposed development will supply 48MW of clean renewable electricity to the National Grid, powering around 14,400 homes annually via renewable sources. This will make a significant contribution towards local and national targets for carbon emission reductions. The proposed development is inherently sustainable, and the application should therefore be approved in accordance with the NPPF.

5.10 The planning application is accompanied by a suite of technical documents which demonstrate that the proposal would not lead to significant adverse harm, and appropriate mitigation can be provided where necessary.

Landscape Impacts

5.11 The site lies within The Fens National Character Area (NCA). Key characteristics of this particular NCA include large-scale, flat, open landscape with extensive vistas to level horizons. This level and open topography shapes the impression of big skies, which conveys a sense of place, tranquillity and inspiration.

5.12 In addition, the site is considered to lie within the Settled Fens Landscape Character Type, as assessed within the Strategic Landscape Capacity Study for South Holland District Council (July 2003). This considers the site and the surrounding area to be predominately flat, dissected by main roads, rivers, drainage channels and drainage ditches often on raised banks. Settlements tend to be nucleated with mature vegetation, some with prominent landmark features.

5.13 The landscape within and surrounding the site is predominantly open arable agricultural land, with drainage ditches across the site and surrounding area, often defining field boundaries.

With the predominant use of the site and surrounding area as arable agriculture on an industrial scale, this results in large, irregular open arable fields that are relatively featureless bar the network of drainage ditches. There is limited tree, woodland, hedgerow and vegetation cover, with the main vertical elements within the landscape being derived from built forms, be it pylons associated with overhead lines or taller buildings. The little tree cover within the landscape is often focussed around the settlements and farmsteads, with some shelterbelts evident in the wider landscape; however, these tend to be relatively short and isolated. Hedgerows, whilst evident within the landscape, are isolated in length, gappy and in poor condition as a whole which results in a poorly connected network, likely due to the large-scale arable use of the land. There are limited and isolated stands of vegetation which includes hedgerows and trees, and extensive drainage ditches. Overhead power lines and associated pylons run through the northern section of the site, in a north-west to south-east orientation, and an underground pipeline with an associated 25m exclusion zone runs through the centre in an east to west direction. The site and the immediate area are not protected at a national nor a local level.

5.14 The site is not subject to extensive planting, and therefore the majority of the small number of existing trees, hedgerows and scrub are to be retained, both around the site boundaries and along the internal field boundaries. The aim is to retain and enhance the small number of landscape features within the site where possible, which would result in a subtle change from arable to solar within the wider man-made landscape.

5.15 The proposed development would change the landscape character of the site from agricultural land to a solar farm; however, it would benefit from an enhanced landscape scheme that would strengthen and enhance the existing boundary vegetation. Furthermore, where sensitive receptors border the site, an appropriate landscape buffer is provided, with a minimum depth of 10m.

5.16 The proposal is a temporary change and would still allow for appropriate rural uses such as grazing or wildflower meadow creation. A Landscape Visual Appraisal accompanies the outline planning application, which concludes that the landscape is not diminished by the development and that there is no policy, landscape or visual reason why the application site should not be developed.

Residential Amenity

5.17 The site is located between the villages of Holbeach St Marks, Holbeach Bank and Holbeach Hurn, with the town of Holbeach located approximately 2km to the south west of the site. There are isolated residential properties and farmsteads located along the western side of Middle Marsh Road, which runs along the western boundary of the site, and the site also contains 1 and 2 Bass Cottages (two semi-detached dwellings) along with the Red House Farm farmstead. Middle Marsh Road is also considered to be part of the Cycle Network within the area, as demonstrated on the Policies Map, which accompanies the South East Lincolnshire Local Plan.

5.18 It is likely that road users of Middle Marsh Road and Roman Road, along with the residential dwellings along these roads, and those residential dwellings located within the site, are likely to be the most impacted in terms of visual amenity. Road users, by their temporary nature, are considered to be less impacted in terms of visual amenity. Whilst there is no right to a view over land not within a person's ownership, the proposed development will allow for appropriate buffers and setback distances between the development and site boundaries and also incorporate landscape mitigation which will visually screen the development whilst being sensitive to the open nature of the surrounding landscape. If there was considered to be any adverse impact on the amenity of the residents, it is considered that the provision of the solar farm and the environmental benefits that this would bring would outweigh any harm.

5.19 It is acknowledged that 1 and 2 Bass Cottages with the Red House Farm farmstead sits within the site. Again, the proposal ensures that appropriate buffers and setback distances are provided to assist in reducing the impacts upon the amenity of residents at the farmstead. It should be noted that it is particularly difficult to find appropriate sites for solar farm developments where there is a suitable grid connection and are not located close to any dwellings at all, and it is inevitable that such proposals are within proximity of a small number of dwellings.

5.20 Due to the nature of the proposal, there will be no impact in terms of odour and vibration, and the arrays do not give rise to any emissions which will impact air quality. In terms of noise, the on-site inverters and transformers will have negligible impact on residential amenity, mainly due to the intervening distance between them and existing dwellings, but also as they only give rise to a low hum during operation.

5.21 In terms of glint and glare, solar arrays are finished with non-reflective materials and seek to absorb light rather than reflect it, and they do not include metallic elements. Furthermore,

they are tilted at an angle that means that you are unlikely to see any reflection, particularly at low lying levels associated with residential properties.

Nature Conservation and Protected Species

5.22 The conservation and enhancement of the natural environment is a core principle of the NPPF, which seeks a level of protection for wildlife sites commensurate with their status and with appropriate weight to their importance and the contribution they make to wider ecological networks. At a local level, Local Plan Policy 28 seeks to ensure that new development minimises impacts on biodiversity and provide a net gain on-site.

5.23 The nearest ecological assets are The Wash SSSI, SPA, SAC, Ramsar site and NNR which are located approximately 4.8km to the north of the site. The Application is accompanied by an Ecological Impact Assessment and a Biodiversity Net Gain Report. The Appraisal concludes that there are no ecological reasons to prevent the development and recommends appropriate biodiversity enhancements and mitigation, whilst the latter report sets out that the proposal will lead to a significant net gain in both habitats and hedgerows. A Biodiversity Management Plan can be secured through a suitably worded condition which can detail the conservation objectives for habitats and species present, provide information on how new habitats are to be established and the ongoing management and monitoring practices required to achieve the objectives.

Heritage Assets

5.24 Where any development may affect designated or undesignated heritage assets, there is a legislative framework to ensure the proposals are developed and considered with due regard for their impact on the historic environment. This extends from primary legislation, which requires decision-makers to have regard to the desirability of preserving the character of listed buildings and their setting. In relation to listed buildings, any proposal will be considered by the local authority in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990 (Section 66), which requires decision-makers to have regard to the desirability of preserving the setting of listed buildings.

5.25 Paragraph 194 of the NPPF states that: "*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of*

the proposal on their significance. As a minimum, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary."

5.26 Further to this, Paragraphs 199 of the NPPF states that:

"*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

5.27 Local Plan Policy 29 (Historic Environment) states that where development proposals would affect the significance of a heritage asset (whether designated or non-designated), including any contribution made to its setting, it should be informed by proportionate historic environment assessments and evaluations.

5.28 Although there will be no direct work to a heritage asset, the likely impact on the setting of the nearest and most prominent heritage assets is considered within the Heritage Assessment.

5.29 The image below sets out the nearest listed buildings and Scheduled Monuments to the site.

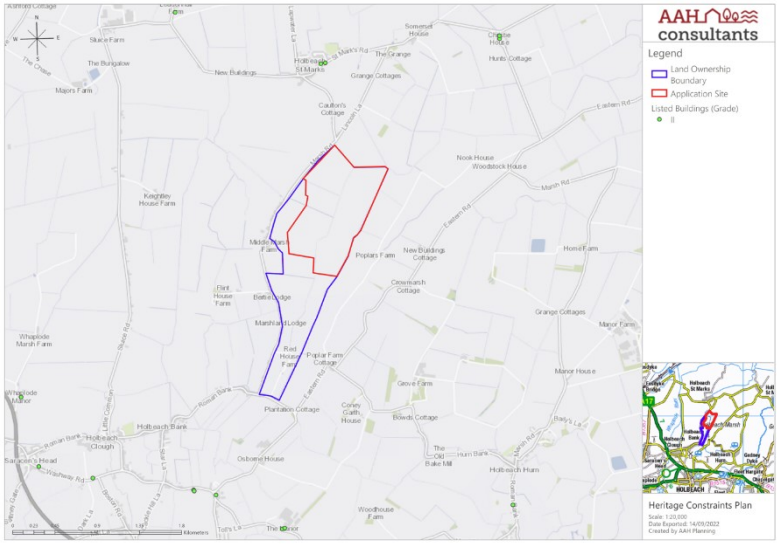


Image 5.1: Heritage Designations

5.30 As can be seen, the nearest Listed Buildings are some distance from the site, located to the south around the Penny Hill area and to the north of the site within Holbeach St Marks and therefore are unlikely to be impacted by the development.

5.31 The location of the site, settlement pattern, and built form ensure that development of the site would be unlikely to have any significant impacts on any heritage assets, including their respective settings. Furthermore, the distance and intervening landscape (including the built form and trees/vegetation) ensure that there are no significant impacts on any heritage designations within the wider area.

5.32 The limited visual impact of the proposal, which will be further enhanced through landscaping and planting and the lack of physical impacts as a result of the proposals, would ensure that the scheme does not result in substantial harm.

5.33 In regards to archaeology, the route of a medieval sea bank crosses the wider site towards its southern end in the area of Red House Farm. The bank enclosed an area north of 'Roman Bank' extending the area protected from inundation by the sea, prior to the whole area north of Roman Bank being reclaimed in the 1600s. Medieval saltern remains are known to the east and west of the site and along the north side of these former sea banks in the surrounding landscape, and it is likely that similar remains may survive on the site also, below ground however, the upstanding remains have been levelled at some point in the more recent past. The proposed development has been situated to avoid the archaeology in this area. The accompanying Archaeological Desk-Based Assessment and a Heritage Statement that concludes that there is no impact upon Heritage Assets nor archaeology.

Highway and Access

5.34 Paragraph 110(b) of the NPPF states that when assessing development proposals, it should be ensured that *"safe and suitable access can be achieved for all users*". An existing access along the north-western boundary is proposed to be utilised, where appropriate visibility splays can be achieved. The proposed access will be constructed as a simple priority junction; the access road will have a proposed width of 5.5m with 10m kerb radii. In terms of routing, vehicles accessing the site are expected to travel along Red Cow Drove via the A17. Vehicles will turn into Middle Marsh Road, Leadenhall Road, Middle Marsh Road and then onto the site. Vehicles egressing the site are expected to turn left onto Middle Marsh Road, continue along a short section of Roman Bank, turn onto a short section of Washway Road which joins Peartree House Road and continue south towards the junction with the A17. Both routes avoid the use

of a section of Roman Bank Road to the south-west of Middle Marsh Road, where properties are located along the roadside and the nature of the road is more winding.

5.35 Paragraph 111 of the NPPF states that "*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*". Policy 31 Part B of the Local Plan states that development proposals for renewable energy facilities will have to consider highway safety, including public rights of way, as one of the listed seven criteria all renewable developments have to meet.

5.36 The number of vehicles visiting the site will occur predominantly throughout the construction phase of the development, with vehicles delivering parts and workers to install the development. The level of traffic generated during the operational phase of the development will be minimal, limited to occasional visits in a van for maintenance checks.

5.37 A Transport Statement (TS) accompanies the application undertakes an assessment of the local road network and vehicular movements during both the construction and operational phases. The TS demonstrates that there is sufficient capacity on the local highway network to accommodate the number of vehicular movements estimated to be generated by the proposal without giving cause to any adverse impacts on capacity or road safety.

5.38 The proposal is, therefore, in accordance with NPPF paragraphs 110 and 111 and Policy 31.

Public Rights of Way

5.39 There are no known designated Public Rights of Way in close proximity to the site, nor within it, that are considered to be impacted by the proposed development.

Design

5.40 The scheme has been designed to ensure that the environmentally sensitive areas of the site are protected and to ensure minimal visual impact of the proposal. The design has evolved to take advantage of the opportunities for biodiversity and landscape improvements whilst maintaining visual amenity, including through the provision of appropriate offsetting distances from the PRoW, and the provision of landscape mitigation.

5.41 The design of the scheme needs to be balanced against the specific and functional requirements of the proposal, particularly in terms of the appearance of the arrays and associated infrastructure, such as the inverters and transformers. However, measures have been put in place to assist in ensuring that the development has as minimal impact as possible.

5.42 The equipment on site is low lying, so whilst the development extends over a relatively large area, the impact of the development is significantly reduced by its low-lying nature. The accompanying LVA has assessed the proposal from key viewpoints in the surrounding area to ensure that the visual impact of the proposal is suitably mitigated.

5.43 To ensure the site safety, a fence is proposed around the perimeter of the arrays to restrict unauthorised access.

Agricultural Land Classification

5.44 An Agricultural Land Survey has been undertaken and accompanies the application. The report concludes that the land is entirely Grade 2. As such, the site is deemed to be best and most versatile agricultural land, which Annex 1 of the NPPF states comprises that land in grades 1, 2 and 3. It should be noted, however, that South East Lincolnshire has a high proportion of high-quality agricultural land, meaning it is largely made up of the best and most versatile agricultural land with little opportunity to locate developments on poorer quality land.

5.45 The solar panel arrays would be mounted on steel posts driven into the ground, and no substantial areas of concrete construction would be required, with the exception of foundations for the Inverter and the sub-station buildings. The solar panel arrays could therefore be removed when planning permission has expired with no likely permanent loss of agricultural land in the longer term. Whilst soil would be disturbed in some parts of the site through the construction of the switch station and access tracks along with the installation of buried cables, this equates to a relatively small area, and much of the soil disturbance is likely to be reversible during decommissioning.

5.46 In addition, the land situated around the proposed solar arrays could remain in agricultural use through the grazing of animals, and therefore when the development is decommissioned, the reversible effects and the potential grazing of the land may create a betterment, leaving it more fertile.

5.47 A solar farm of a similar size was recently approved by Boston Borough Council (Application Ref: B/21/0443) which was also located on Best and Most Versatile Land. The ALC report (June 2021) submitted for the aforementioned application resulted in a classification of 26.06 ha of Grade 2 and 54.3 ha of Grade 3a land, therefore all falling within the BMV category. Natural England did not object to this proposal, and stated that *"We consider that the proposed development is unlikely to lead to significant long-term loss of best and most versatile land, as a resource for future generations. This is because the solar panels would be secured to the ground by steel piles with limited soil disturbance and could be removed in the future with no permanent loss of agricultural land quality likely to occur, provided the development is undertaken to high standards. Although some components of the development, such as construction of a sub-station, may permanently affect agricultural land this would be limited to small areas."* Natural England did require however the LPA to consider the loss of BMV (albeit temporary) against other planning considerations. The LPA considered that due to the small areas occupied by the substation compound, batteries, inverters and access roadways, the only impacts on soils will be the insertion of support legs for the solar panels and temporary surface compaction of soils during equipment installation. It further considered that grazing can take place between rows of panels and the land will be capable of returning to almost unchanged agricultural quality and use after the typical life time of the solar park installation and that due to the wider area comprising of the same or higher-grade land, there was no loss of higher grades of agriculture land. It was concluded that whilst the loss of arable land was inevitable, there was potential for grazing alongside ecological and landscaping enhancements. Additionally, given the wider national and local support for renewable energy, and the application was considered acceptable in all other regards, the loss of agricultural land (albeit temporary) was not grounds for refusal. We consider the same conclusion can be reach for the Site subject to this application.

5.48 Therefore, it is considered that whilst the proposed solar farm is located on Best and Most Versatile Land, due to the temporary nature of the solar farm along with its largely reversibility and potential continued use for grazing, it is not considered that there is a loss of agricultural land nor a significant issue.

Flood Risk

5.49 The site is located within Flood Zone 3, as shown on the Environment Agency Flood Risk Map. Flood Zone 3 is land assessed as having less than 1 in 100 or greater annual probability of river flooding, or land having a 1 in 200 or greater probability of sea flooding. NPPF Paragraph 159

states that: *"Inappropriate development in areas at risk should be avoided by directing development away from areas at highest risk (whether existing or future)."*

5.50 The need for a viable connection to the electricity network, particularly as there is constrained grid capacity and costs will increase with distance from available connection points to the National Grid. The 132kV line which crosses the site has sufficient capacity to accommodate the proposed scheme. This infield connection avoids the requirement for expensive long underground cabling to provide the connection, which would make the scheme unviable if more than 2km in length. The need for the connection to the network has acted as a constraint to the siting of the proposed Solar Farm, which in turn will define the geographical search area for the Sequential Test. Nevertheless, a Sequential Test is a requirement.

5.51 Solar Farms are regarded as Essential Infrastructure as defined by Annex 3 of the Framework; Flood Risk Vulnerability Classification. Table 3 defines the Flood Risk Vulnerability Classification by Flood Zone and confirms that Essential Infrastructure in Flood Zone 3 is appropriate subject to the Exception Test.

5.52 In terms of the NPPF Exception Test it is considered that as the proposal is for essential infrastructure, it will meet part a) of the test. In terms of part b) the development will not be open to the general public and will not result in an increase in flooding elsewhere.

5.53 The accompanying flood risk assessment outlines the drainage strategy for the site. Given the nature of solar farms, which have very little built development due to the solar arrays being elevated above ground level, surface water will run off the arrays and continue to infiltrate into the underlying soils locally, as per the current situation. Overall, it is considered that the exception test can be passed using the above principles.

5.54 The proposal is therefore in accordance with NPPF Paragraph 159, which states that *"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)"* and Policy 4 of the Local Plan, which seeks to ensure that all applications consider the effect of the proposed development on flood risk.

6.0 Sustainability of the Proposed Development

6.1 Paragraph 8 of the NPPF explains how "*achieving sustainable development means that the planning system has three overarching objectives, which 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)".*

6.2 The three objectives to sustainable development comprise the following:

*"a) an **economic** objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a **social** objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) an **environmental** objective – to protect and enhance our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

6.3 Economic growth can secure higher social and environmental standards. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

Economic Role

6.4 The proposals would result in the following economic benefits and effects:

- Direct employment in the construction phase;

- Direct employment through the operational and decommissioning phases; and

- Job creation in the supply chain and related services.

Social Role

6.5 The proposals would result in the following social benefits and effects:

- Increased energy security and independence from imported energy;

- Stable energy prices leading to reduced bills and less impact on household finances; and

- Less air pollution when compared to the burning of fossil fuels to produce energy.

Environmental Role

6.6 The proposals would result in the following environmental benefits and effects:

- Significant carbon savings and production of renewable energy generation thereby offsetting the need to generate energy from fossil fuels;

- Potential to generate enough renewable energy to power approximately 14,400 homes and offset around 20, 640 tonnes of CO2 per year;

- Providing an important renewable energy generation resource for the County and the local community;

- The components of the solar farm are recyclable; and

- A biodiversity net gain.

Summary

6.7 The proposal will bring significant benefits, including at the national level, by contributing towards the transition to a low carbon economy, which will lead to the decarbonisation of the

energy sector and less reliance on fossil fuels. This is key to ensure that the UK can achieve its target of reaching net-zero by 2050 and to reduce climate change.

6.8 It is considered that the proposal constitutes sustainable development.

7.0 Conclusion: Planning Balance

7.1 There is an urgent need to reduce carbon emissions as quickly as possible. This is recognised not only by the Government, which has set a target for the country to reach net-zero by 2050, but also by Lincolnshire County Council who have committed to being carbon neutral by 2050. South Holland District Council have also recently adopted a new Climate Change Strategy.

7.2 This application proposes to deliver 48MW of clean renewable energy that will power approximately 14,400 homes a year leading to annual carbon emission savings of around 20,640 tonnes of CO2 and making a significant contribution towards both local and national targets for carbon neutrality.

7.3 Both national and local policy encourages the development of renewable energy schemes providing environmental issues are not adverse, and if applicable, appropriate mitigation measures implemented. This Statement demonstrates that the proposal has been carefully designed to take account of national and local planning policies and the site's opportunities and constraints. Furthermore, the accompanying environmental reports demonstrate that the development will not have an adverse impact on the surrounding landscape and both the natural and historic environment.

7.4 The proposal offers a sustainable development that would bring a number of benefits, in particular significant wider environmental benefits in terms of renewable energy generation and reduction in carbon emissions. In addition, the development would bring a number of social and economic benefits, and it is, therefore, clear that it performs a positive economic, social and environmental role as required by the NPPF.

7.5 The proposed development is compliant with the NPPF and the development plan and constitutes sustainable development. On the basis of the evidence provided, and the justification set out in this Statement and other supporting documentation, it is respectfully requested that, in line with the presumption in favour of sustainable development, the application is approved without delay.