

Erection of ground mounted solar array and associated works

Bakkavor Pizza & Bread Holbeach, Sluice Road, Holbeach St Marks, Spalding, PE12 8HF

**Planning Statement
& Design and Access Statement**

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Document Information

About

This document has been prepared for Centreco UK Ltd by Squires Planning.

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Graphics & Mapping

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1. Introduction

- 1.1. The Planning Statement has been prepared by Squires Planning in support of an application by Centreco UK Ltd for the:

‘Erection of ground mounted solar array and associated works’

- 1.2. This document provides an overview of the site, its context and the proposed development before considering the material considerations relevant in the determination of this application.

Site & Situation

- 1.3. The application site is situated directly north of the existing Bakkavor Pizza & Bread Holbeach site, and forms part of a larger parcel of land that sits between Middle Marsh Road and the Bakkavor site. The site is roughly 2.6km west of Holbeach St Marks and 3.5km south east of Fosdyke.
- 1.4. The wider site comprises an undeveloped parcel of land most recently used for agriculture. It is bordered to west by Holbeach River, and to the north and east by an unnamed watercourse. Other than the Bakkavor complex to the south, the application site is enclosed by existing agricultural fields.
- 1.5. The site is relatively flat, although its south east corner slopes slightly north west to south east, with a fall in level of approximately 0.5m relative to the rest of the site.
- 1.6. The site is within the countryside and entirely within Flood Zone 3.
- 1.7. The site is not within or near any nationally or locally-designated sites or protected or priority habitats and species. There are no ecological or landscape constraints applicable to the site.
- 1.8. There are no heritage assets or features at the site or within the broader area.

Planning History

- 1.9. There have been numerous applications made for development at the Bakkavor facility but there are no applications recorded in respect of the principal part of the applications site for this proposal.

2. The Proposed Development

- 2.1. This application is for the '*Erection of ground mounted solar array and associated works*'.
- 2.2. The development principally comprises the installation of rows of ground-mounted solar PV panels on land to the north of the existing Bakkavor site. The individual panels will be south facing and inclined to maximise solar gain. The panels will be mounted on metal frames, with the panels a minimum of 0.3m above ground level, with cabling and other component elements of the installation also utilising the metal framework. The distance between individual rows is expected to be approximately 2.5 - 3m.
- 2.3. The proposed development is being brought forward to provide a renewable energy contribution to the energy requirements of the adjacent Bakkavor Pizza production facility. Provision of the array will thereby support the energy requirements of the neighbouring commercial site and will provide resilience to meeting the ongoing energy demands associated with the commercial operation of the site, as well as providing sustainability and financial benefits.
- 2.4. Bakkavor is a leading UK supplier of food products, serving a wide customer base including major supermarkets. The Bakkavor Holbeach site, which is one of a number of factories across the UK operated by the company, was originally acquired in 2001 with a dedicated pizza manufacturing facility established on site by 2003. The promotion of sustainability objectives, and support for decarbonisation and carbon reduction are amongst the business's strategic priorities.

3. Planning Policy

- 3.1. Planning decisions should be taken in accordance with the development plan unless material considerations indicate otherwise (Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 3.2. The adopted development plan, for the purposes of this proposal, is the South East Lincolnshire Local Plan 2011-20.
- 3.3. Policy contained in the National Planning Policy Framework (NPPF) published in December 2024 is also material in the determination of this application.
- 3.4. The most relevant policies in the development plan and national policy are set out below.

South East Lincolnshire Local Plan 2011-2036

- 3.5. The South East Lincolnshire Local Plan (SELLP) was adopted in March 2019 and produced by the South East Lincolnshire Joint Strategic Planning Committee which comprises Boston Borough Council, South Holland District Council and Lincolnshire County Council.
- 3.6. The Local Plan sets out the 'vision' for south east Lincolnshire to 2036. This vision expects the economic base of the area to have been strengthened, including by supporting the growth of existing businesses in food production, processing and distribution.
- 3.7. **Policy 1: 'Spatial Strategy'** - directs appropriate development to defined areas including centres, settlements and the countryside. In respect of countryside areas the policy permits development necessary to its 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*". Supporting paragraph 3.2.16 recognises that "*some land uses may also require a countryside location because of their functionality*".
- 3.8. **Policy 2: 'Development Management'** - provides "*sustainable development considerations*" that all development is expected to meet. The criteria include "*maximising the use of sustainable materials and resources*"; "*impact on neighbouring land uses*" and size, scale and layout; impact on character and appearance of the area and "*relationship to existing development*". Supporting paragraph 3.3.5, clarifies that the intention of the criterion relating to the use of sustainable materials and resources is to ensure that development is not "*wasteful in its use of energy*".
- 3.9. **Policy 3: 'Design of New Development'** - sets general design expectations "*where relevant*" to the development proposed. The design considerations set out in the policy are broad, including scale, views, landscape character, residential amenity, flood risk and promoting "*the best use of decentralised and renewable low-carbon energy technology*".
- 3.10. **Policy 4: 'Approach to Flood Risk'** - says development in Flood Zone 2 and 3 will be permitted where criteria relating to the sequential test, infrastructure and the submission of a flood risk assessment are satisfied. Criterion 1, relating to the sequential test, anticipates a district-wide search area of alternative sites unless local circumstances "*relating to the catchment area for the development*" justifies a reduced search area. In this case the proposed development is directly related to the neighbouring site and an alternative location would not be plausible.

- 3.11. Criterion 2, in respect of infrastructure, permits essential infrastructure in Flood Zone 3 and Flood Zone 3b providing it is demonstrated that the infrastructure provides wider sustainability benefits to the community that outweigh the flood risk.
- 3.12. Criterion 3 expects applications to be supported by a Flood Risk Assessment that (where necessary) demonstrates:
- that the vulnerability of the proposed use is compatible with the flood zone
 - that the relevant predicted flood risk level is identified and mitigation measures show how the development will be made safe
 - appropriate flood resistance and resilience measures
 - include, where necessary, flood warning and evacuation procedures
 - incorporates SuDs (unless such as not technically feasible)
 - demonstrate the proposal will not increase risk elsewhere
- 3.13. The policy also expects development in all flood zones to *“demonstrate that surface water from the development can be managed and will not increase the risk of flooding to third parties”*.
- 3.14. The development proposals are supported by a Flood Risk Assessment that addresses relevant elements of Policy 4, including mitigation measures applied by the proposed development, and the incorporation of SuDs, by way of interception swales, as part of the surface water drainage strategy.
- 3.15. **Policy 7: ‘Improving South East Lincolnshire’s Employment Land Portfolio’** - explains that South East Lincolnshire authorities (in this case South Holland District Council) will support proposals which assist in the delivery of economic prosperity.
- 3.16. **Policy 28: ‘The Natural Environment’** - expects development to provide an *“overall net gain in biodiversity”* through, amongst others, protecting the biodiversity value of land and maximising opportunities for restoration and enhancement of natural habitats. The development proposal is informed by a Preliminary Ecological Appraisal of the site, and Biodiversity Net Gain (BNG) Assessment, that examines the ecological value of the site and how the proposed development satisfies the expectations of Policy 28.
- 3.17. **Policy 31: ‘Climate Change and Renewable and Low Carbon Energy’** - supports the development of renewable energy facilities and associated infrastructure subject to the development *“individually or cumulatively”* resulting in *“no significant harm”* to visual amenity, landscape character or quality, residential amenity, highway safety, agricultural land take, aviation and radar safety, heritage assets and the natural environment.
- 3.18. The supporting text to Policy 31, encourages the layout of development proposals to take account of flood risk.

Other Material Considerations

National Planning Policy Framework

- 3.19. The NPPF is the overarching national policy framework for England. It provides a framework within which locally prepared plans can provide for housing and other development in a sustainable matter. As set out in paragraph 2, the NPPF must be taken into account in preparing the development plan and is a material consideration in planning decisions.
- 3.20. Paragraph 8 sets out the objectives for sustainable development. These include:
- 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
 - and
 - c) **an environmental objective** – including moving to a low carbon economy.
- 3.21. **Paragraph 85** of the NPPF expects planning policies and decisions to *“help create the conditions in which businesses can invest, expand and adapt”*, and that *“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”*.
- 3.22. **Paragraph 167** expects local planning authorities, in determining planning applications, to give significant weight to the need to support energy efficiency including by way of the installation solar panels, and **Paragraph 168** stresses that, when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should:
- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and **give significant weight** to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future
 - b) recognise that small-scale projects provide a valuable contribution to cutting greenhouse gas emissions
- 3.23. **Paragraph 170** 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). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”*.
- 3.24. **Paragraph 173** highlights that *“A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in the future from any form of flooding, by following the steps set out below”*.
- 3.25. **Paragraph 174** states that *“Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed*

development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test”.

- 3.26. **Paragraph 177** states that *“Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3”.*
- 3.27. **Paragraph 181** highlights that local planning authorities should ensure that flood risk is not increased elsewhere and, where required, applications should be supported by a Flood Risk Assessment. The paragraph advises that development should only be allowed in areas at risk of flooding where, in light of the (flood risk) assessment, it can be demonstrated that:
- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
 - b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
 - c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
 - d) any residual risk can be safely managed; and
 - e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

National Planning Policy Guidance,

- 3.28. National planning guidance relating to ‘Renewable and low carbon energy’ advises that *“renewable energy development should be acceptable for their proposed location”* (Paragraph: 010 Reference ID: 5-010-20140306), but that in addition to factors that should be considered regarding the acceptability of a location there are *“particular considerations”* for specific technologies.
- 3.29. For photovoltaic (solar PV) technology, such additional factors (as set out in national policy guidance Paragraph: 012 Reference ID: 5-012-20140306) include:
- *the importance of siting systems in situations where they can collect the most energy from the sun*
- and
- *need for sufficient area of solar modules to produce the required energy output from the system*

South East Lincolnshire Strategic Flood Risk Assessment 2017

- 3.30. The South East Lincolnshire Strategic Flood Risk Assessment (SELSFRA) was prepared in March 2017 and provides information and guidance on a flood risk issues within the South East Lincolnshire region. The introduction to the SELSFRA outlines the extent of the South East Lincolnshire area that is at a high probability of flooding, and confirms that approximately 68 % of South Holland lies within Flood Zone 3, including numerous residential and commercial properties.
- 3.31. Paragraph 1.3.11 of the SELSFRA advises that the relevant local authorities and the Environment Agency (EA) have agreed 'standing advice' in respect of a framework of flood risk mitigation requirements for development proposals to provide a level of safety over the lifetime of a development where development in areas at risk is deemed appropriate and necessary to meet local need.
- 3.32. The SELSFRA includes reference to fluvial and tidal hazard and depth mapping, which is included within the document at Appendices A & B. This mapping, sourced from the EA, is included within, and referenced by, the FRA accompanying this planning application.
- 3.33. Section 8 of the SELSFRA relates to the Sequential Test, and noting that *"large parts of South Holland district lie within FZ3"*, advises that any sequential test should use the *"refined flood risk information (Hazard and Depth Maps)"*.
- 3.34. The use of hazard and depth maps is re-confirmed at paragraph 8.3.9 of the SELSFRA, which recognises that the (EA) *"Flood Map will not provide information that is refined enough to carry out a meaningful sequential test due to the extent of FZ3 in this area, Therefore the hazard map and depth maps should be used (in that order) to refine the information on flood risk to the site"*.
- 3.35. Section 9 of the SELSFRA, provides advice in relation to the Exception Test, echoing the expectations of national policy, in that the test (if applicable) requires proposed development to show that *"a) it will provide wider sustainability benefits to the community that outweigh flood risk, and b) that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall"*.
- 3.36. Section 10 of the SELSFRA advises that the EA and Local Planning Authorities have produced 'standing advice' that has been prepared to assist the interpretation of the SELSFRA and the evidence expectations relating to individual developments. For *"Essential Infrastructure"*, the standing advice matrix (for all scenarios other than Flood Zone 2) says:
- "The application must be referred to the Environment Agency together with a supporting Flood Risk Assessment, which demonstrates that the proposal will remain operational during a 0.1% event (2115 scenario) and that appropriate mitigation measures/flood resilient construction techniques have been incorporated into the development."*
- 3.37. The prepared FRA accompanying the application considers flood risk issues in detail including in respect of how the proposal satisfies national and local policy requirements and the expectations of the SELSFRA, including the incorporation of measures to ensure operational resilience of the proposal and the promotion of sustainable drainage.

4. Main Considerations

4.1. Given the site's constraints and the development proposed, the main considerations for this application are:

- Principle of development
- Design, Access & Visual Amenity
- Flood Risk & Drainage
- Access and Highways
- Ecology & Biodiversity Net Gain

We discuss each of these considerations in turn below.

Principle of development

- 4.2. As outlined above, the purpose of the proposed development is to provide a reliable, renewable energy contribution to the energy requirements of the adjacent commercial operation.
- 4.3. The NPPF gives explicit, in principle, support to proposals for renewal energy and expects significant weight to be given to renewal energy objectives, including the installation of solar panels, and to the benefits associated with renewable and low carbon energy generation. This, in principle support for renewable energy provision is underlined by the clear expectation, set out in national policy, that applicants should not be required to demonstrate the overall need for renewable energy.
- 4.4. This position is also reflected by national planning policy guidance, which acknowledges that renewable energy developments should be acceptable for their proposed location but, in determining the acceptability of such development at its location, particular consideration should be given to factors relating to layout ("*where they can collect the most energy from the sun*") and scale ("*need for sufficient area of solar modules to produce the required energy output from the system*").
- 4.5. At the local level, Policy 31 of the SELLP explicitly supports the development of renewable energy facilities in principle, with other policy support for the principle of renewable energy provision provided by Policy 2 and Policy 3.

Design, Access & Visual Amenity

- 4.6. The design of the proposed development has been informed, principally, by the technical requirements and specifications of the proposed PV infrastructure, in association with the context of the site, including site levels and the site's exposure to flood risk.
- 4.7. The key design principles applied include making best use of site's location close to the existing Bakkavor facility; maximising the density of the installation, whilst having regard to technical requirements (such as the panel orientation); ecological and drainage benefits associated with the

separation of rows; landform; the flood risk potential of the site (as expected by flood policy and guidance); and ensuring the efficiency of the installation in the generation of electricity is maximised (by, for example, the orientation of PV panels).

- 4.8. The site area and dimensions of the scheme, including the maximum height of the panels, is very modest in the context of the surrounding landscape. The proposal will not be a prominent feature and is likely to be barely (if at all) visible from surrounding areas, including from the nearby road network.
- 4.9. Access to the application site is via the existing Bakkavor site.
- 4.10. Other than the surrounding road network, there are no footpaths or other routes within the vicinity of the site.
- 4.11. The application is supported by a 'Construction and Operational Traffic Management Plan', which sets out the access considerations relevant to the proposed development, including the development schedule for the site and traffic generation and access considerations relating to the development and the operational phases of the development.
- 4.12. The Traffic Management Plan assesses the existing access to the Bakkavor site and the impact the proposal is expected to have on the local highway network plus expected traffic movement associated with the proposed development. The Traffic Management Plan sets out measures to be applied to manage the transport aspects associated with the construction and installation of the proposal.
- 4.13. The Traffic Management Plan confirms that the level of construction HGV traffic will fall "*well within*" the day-to-day variation of current operational movements at the Bakkavor site (approximately 35 – 50 HGV deliveries per day).
- 4.14. In addition to HGV deliveries, construction operations are expected to generate approximately 10 -15 full-time jobs at the site. On-site provision will be made to enable all associated construction vehicles, including private cars, to park on-site to avoid obstruction or the operation of the public highway.
- 4.15. Once operational, the Solar PV installation is not expected to require significant maintenance, or otherwise have any material impact on existing access arrangements and traffic patterns associated with the Bakkavor site as a whole.

Flood Risk & Drainage

- 4.16. The application proposal is supported by the accompanying Flood Risk Assessment (FRA), prepared by K-Ten Consulting. Paragraph 1.5 of the FRA confirms that its purpose is to "*investigate and assess the various risks of flooding on site to the proposed development and to provide mitigation where appropriate in order to ensure future users of the development remain safe throughout the lifetime*".
- 4.17. In accordance with the expectations of national policy, the FRA considers and provides an assessment of flood risk in relation to all potential sources of flooding, particularly tidal, fluvial and pluvial.

- 4.18. The site is within Flood Zone 3. In line with SELLP Policy 4, development within FZ3 is deemed permissible subject to certain criteria being met (see Section 3 above). Criteria 2 of Policy 4 in respect of infrastructure, permits 'essential infrastructure' in FZ3 providing it is demonstrated that the infrastructure provides wider sustainability benefits to the community that outweigh the flood risk.
- 4.19. In this case, there are clear sustainability benefits arising from the proposed development, both in respect of its contribution to renewable energy provision and targets, and in respect of supporting the continued economic health and other benefits associated with the Bakkavor facility.
- 4.20. It is evidently also the case that the objective of the proposed development, and the renewable energy and economic gains it is designed to deliver, are specific to the site, and would not be delivered from an alternative site outside of Flood Zone 3.
- 4.21. In line with the expectations of Criterion 3 of Policy 4, the accompanying FRA, with reference to EA tidal hazard and depth mapping, assumes a worst case scenario in the event of a tidal breach, to determine appropriate flood mitigation measures to be applied where appropriate to be the proposal. The provision of PV panels has been, by design, omitted from some parts of the (red-line) site specifically due to flood risk associated with those parts.
- 4.22. Paragraphs 6.7 and 6.8 of the FRA confirm the proposed mitigation measures applied. This includes that the proposed PV panels *"would be above the highest risk and level of flood water accumulation. It is also proposed that all solar panels will be located within the 0.0m-0.25m areas and will be raised 300mm above flood levels"*.
- 4.23. In respect of surface water drainage, the FRA concludes that the *"effect the proposed solar farm would have on the greenfield runoff rates are considered to be negligible and would equate to a very small/minor increase to the greenfield runoff rate"*. Nevertheless, interception swales are proposed as part of the surface water drainage strategy. The interception swales (identified at Appendix F of the FRA) are proposed primarily alongside the eastern edge of the main block of PV panels and at low points of the site. The swales are designed as a *"series of discrete 'stepped' units parallel to the site's contours and perpendicular to the slope to ensure flows are not concentrated or conveyed downhill. Interception swales will be formed by creating shallow depressions 300mm deep along the lower boundaries of the site. The interception swales will incorporate a 1 in 3 side slopes and a base width of 0.5m"*.

Ecology & Biodiversity Net Gain

- 4.24. The Preliminary Ecological Appraisal and BNG Assessment, prepared in respect of the proposed development, concludes that the site currently is of low ecological value, and that the site is capable of delivering in excess of the statutory minimum 10% BNG for area habitats on the site.
- 4.25. The PEA also concludes that the proposals are not considered likely to result in significant effect on The Wash SPA, SAC, Ramsar site or SSI, which is located approximately 1.7km north of the site, or to the non-statutory Moulton River Local Wildlife Site, or Moulton Marsh Local Wildlife site, which are located approximately 680m and 1.7km northwest of the site.
- 4.26. Table 2, within the PEA report, identifies a predicted BNG for area habitats of some 135.77%.

- 4.27. The proposal will be subject to the statutory BNG condition, and the requisite Biodiversity Gain Plan (and Habitat Management and Monitoring Plan) required by the statutory condition will confirm how the development will achieve 10% BNG and the long-term management, monitoring and reporting requirements over the statutory 30-year period.

5. Conclusion

- 5.1. The application site is situated directly north of the existing Bakkavor Pizza & Bread Holbeach site, and forms part of a larger parcel of land that sits between Middle Marsh Road and the Bakkavor site. The site, which is owned by the applicant, is within the countryside and entirely within Flood Zone 3 but is otherwise not subject to any designation or constraint.
- 5.2. The proposed development comprises the installation of a number of ground-mounted solar PV panels. The individual panels will be south facing and inclined to maximise solar gain.
- 5.3. The proposed development is being brought forward to provide a renewable energy contribution to the Bakkavor Pizza production facility. Provision of the array will support the energy requirements of the commercial site; provide resilience to meeting the ongoing energy demands associated with the commercial operation of the site; and provide sustainability and financial benefits.
- 5.4. The principle of the development is supported at the local level by the statutory development plan, and at the national level by national policy.
- 5.5. The design of the proposed development has been informed, principally, by the technical requirements and specifications of the PV infrastructure, in association with the context of the site, including site levels and the site's exposure to flood risk. The design and layout of the proposal has regard to ecological and drainage considerations, and the flood risk potential of the site.
- 5.6. The site area and dimensions of the scheme, including the maximum height of the panels, are modest in the context of the surrounding landscape, and overall the scheme will not be a prominent feature in the landscape, and is likely to be barely (if at all) visible from surrounding areas, including from the nearby road network much of which is screened by hedgerow.
- 5.7. Other than the surrounding road network, there are no footpaths or other routes within the vicinity of the site.
- 5.8. Once operational, the Solar PV installation is not expected to require significant maintenance or otherwise have any material impact on existing access arrangements or traffic patterns. For the duration of the construction period, the submitted 'Construction and Operational Traffic Management Plan' sets out measures that can be applied to manage the limited transport aspects associated with the construction and installation of the proposal. The Traffic Management Plan confirms that the level of construction HGV traffic will fall "*well within*" the day-to-day variation of current operational movements at the Bakkavor site.
- 5.9. The development demonstrably satisfies national and local flood risk policy, including LP Policy 4 criteria. In line with policy and guidance expectations, the form and layout of the proposal, has been influenced by, and intentionally excludes, parts of the site at greatest flood risk.
- 5.10. Although the proposal will not significantly affect surface water drainage, the provision of a SuDs feature (interception swales) is proposed.
- 5.11. The site currently is of low ecological value, and capable of delivering in excess of the statutory minimum 10% BNG for area habitats.

- 5.12. As set out above and as demonstrated in the supporting documents, the proposal complies with applicable policy, and national policy objectives set out in the NPPF, and there are no unacceptable impacts associated with the proposal.
- 5.13. We conclude therefore that there is an overwhelming justification for planning permission to be granted.



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