



PLANNING, DESIGN & ACCESS STATEMENT

February 2023 // Moulton Bulb Co. Ltd, Long Lane, Moulton, Spalding, PE12 6PP



Moulton Bulb Co. Ltd

Client: Solar Advanced Systems T/A SAS Energy Ltd

Our Ref: HMG/mac/9501

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1 INTRODUCTION

- 1.1 On behalf of our client, Solar Advanced Systems T/A SAS Energy Ltd, we are instructed to submit a full planning application for the installation of a ground-mounted solar array on land at Moulton Bulb Co. Ltd, Moulton, Spalding. The PV system would supply approximately 21% of the Company's electrical requirement for this site.
- 1.2 Moulton Bulb Co. Ltd was established in 1979 and source and pack the largest range of onions, garlic, and shallots available to the UK market. In 2021, the company supplied 77,000T into the UK domestic market, at a rate of 1,480T per week.
- 1.3 The business uses approx. 7.25GWh electricity a year. The use of solar would help reduce the Company's exposure to increased energy prices and maintain the viability of the business, especially in the current climate of the electrical market. Moulton Bulb are one of the biggest onion packhouses in the UK and still have a desire to continue onion storage, grading and packing and to increase onsite cold storage which would increase energy demand for the site. Onions are a long-term cold store product. The use of long-term cold stores reduces the UK reliance on imported product from Europe (Holland and Spain) and Southern Hemisphere supply from Egypt, New Zealand and Australia.
- 1.4 The company currently has 290 full-time employees. The development of a solar array will help to sustain current levels of employment, as well as supporting local community and businesses in the area through passing trade. The benefits to the company will also allow Moulton Bulb Co. to continue investing in the local community, including Moulton Harrox Cricket Club, Moulton All Saints Church clean up, and Jubilee Weekend activities.
- 1.5 The proposed array will help the business meet its Net Zero requirements whilst mitigating risk in the energy marketplace by virtue of onsite generation. Moulton Bulb supplies a number of UK retailers (Waitrose, Co-op, Aldi, Lidl, Ocado, Iceland, Farmfoods, Asda, Sainsbury's, and Nisa). Their customers retail require the Company to enter REGO-backed electrical supplies which comes at a premium. Onsite generation would help to mitigate the risk to this premium. Western Powers infrastructure will not allow export into the national grid so the generation from the array will be solely for the company's own business.

UK Energy Supply

- 1.6 In October 2020, the UK Government announced their commitment towards net zero emissions by 2050. Energy UK's Chief Executive, Emma Pinchbeck, said:

'The UK's power sector has reduced emissions by nearly 70%, but we know we need to go further and faster on the road to Net Zero. The energy industry will work with Government to turn our world-leading low-carbon power sector into a Green Recovery for the whole economy.'

- 1.7 In 2020, the proportion of renewable energy generation surpassed fossil fuels for the first time. Renewable electricity now represents 43.1% of total generation, up from 36.9% in 2019. Despite this, growth in renewable energy capacity in 2020 was at its lowest level since 2007 (Source: Digest of UK Energy Statistics, 2021).
- 1.8 Until 2011, solar PV capacity represented just 1.0% of total renewable energy capacity. In 2020, solar PV accounted for 28% of renewable energy produced in the UK.
- 1.9 In 2020, net energy import dependency was 27.8%, 7.1% lower than in 2019 and at the lowest level since 2009.

Climate Emergency

- 1.10 There is an urgent need reflected in national and local policies for reducing carbon emissions to limit the damaging impacts of climate change. The rapidly growing use of renewable energy sources, such as solar, is strongly supported.
- 1.11 National energy policy makes clear that energy is vital to our economic prosperity and social well-being and that it is important to ensure that the UK transitions to a low-carbon economy and reduces greenhouse gas emissions. In May 2019, a national climate emergency was declared by the UK Parliament and in June 2019 the UK Parliament approved the net zero target in law, thereby changing the original target of 80% reduction of greenhouse gas emissions (compared to 1990 levels) in the UK by 2050 to 100%.

- 1.12 Lincolnshire County Council has recognised the imperative nature of the radical changes required by implementing a Green Masterplan. The first phase of the Green Masterplan is the 'Initial Action Plan 2020-2025'. As part of the plan, the Council announced: -

"As part of a global effort to help tackle climate change, the government has set a target for the UK to be "net zero carbon" by 2050 – this means that by 2050 we will have to take more greenhouse gases (such as carbon dioxide and methane) out of the atmosphere than we put into them. Achieving this will require big changes in the way we generate power, the way we travel and how we heat our homes.

The council, other public bodies, businesses, and the general population in Lincolnshire all need to play their part in helping the country to meet these challenges. If we are to achieve "net zero carbon" by 2050 we will need to work in close partnership with other groups. As a response to climate change and the 2050 target we have developed a Green Masterplan that sets out the guiding principles of how we will meet this challenge."

- 1.13 In response to climate change and to achieve net zero by 2050, the South and East Lincolnshire Councils Partnership has developed a Climate Change Strategy (2022) which sets out the guiding principles for meeting this challenge. The Strategy recognises that *"small-scale renewables solutions together with larger scale developments are going to be essential to achieving the net-zero aspirations"*.
- 1.14 The Vision for 2036 for South East Lincolnshire includes mitigation and adaptation to climate change through the use of renewable energy technologies to help minimise carbon emissions (Local Plan, p16).
- 1.15 The proposed scheme on Land at Moulton Bulb offers a renewable energy source which will contribute towards mitigating the impacts of climate change.

Pre-Application Discussions with the Local Planning Authority

- 1.16 A pre-application enquiry was submitted on 24th October 2022 with a response issued on 13th December 2022. The pre-application advice considered no major impacts are expected to arise as a result of the proposal and any potential impacts can be reduced through appropriate measures. For the scheme, it remains the starting point that there is an overwhelming need for increased production of energy

from solar arrays as a renewable source and there is a compelling justification for the proposal where there is no harm to the character and appearance of the area.

- 1.17 The site context has been used to inform the design and scale of the proposals. This is demonstrated within the supporting documentation as set out in the landscape proposals, ecology report, glint and glare assessment, and within this Planning, Design & Access Statement.

2 SITE LOCATION

General Location

- 2.1 The site is located approximately 600m south-west of Moulton.
- 2.2 The A151 is one mile to the north and provides a link to Spalding to the west and Holbeach to the east. The A16 is approximately two miles to the west providing access to the north and south of the county.

Site Description

- 2.3 The site is bound by West Cob Gate to the north and Broad Lane to the east. To the south are the Moulton Bulb warehouses and packaging plants, and to the west is open farmland (see Photograph 1).



Photograph 1: Open Farmland at Moulton Bulb Co. Ltd

- 2.4 Immediately to the north of the site is Peloton Produce, a wholesaler of fruit and vegetables. An application for the change of use of agricultural land to commercial including cold store extension to the west of the Peloton Produce warehouse was approved in September 2022 under reference H13-0599-22. The proposed solar array would abut the southern boundary of the approved scheme. This boundary comprises a raised berm mainly laid to grass with scrub vegetation and continues around the ploughed field along the eastern boundary of the application site. Beyond the berm are long rear gardens to the houses fronting Broad Lane to the east.

- 2.5 The ground-mounted solar array would cover an area of approximately 2.24 hectares located on a ploughed field to the north of the main complex of warehouses and operational business. There is an established tree screen separating the ploughed field from the main complex.
- 2.6 Vehicular access to the site is from Broad Lane on the eastern perimeter (see Photograph 2).



Photograph 2: Access to the site from Broad Lane

3 PLANNING HISTORY

3.1 There are various planning permissions for the site dating back to 1983 and these are summarised in Table 1.

Application Reference	Description of Development	Decision	Date
H13-0092-21	Erection of Onion Drying/Conditioning Store	Granted	27/04/21
H13-0010-20	Siting of 13 LPG bulk vessels (retrospective) and siting of 6 additional LPG bulk vessels	Granted	13/05/20
H13-1177-19	Siting of 13 LPG bulk vessels (retrospective) and siting of 6 additional LPG bulk vessels	Granted	13/05/20
H13-0526-15	Installation and operation of a 858.585kW rooftop-mounted solar PV system	Granted	21/07/15
H13-0112-13	Proposed despatch store with loading docks	Granted	13/02/13
H13-0262-12	Proposed building for onion grading line	Granted	02/07/12
H13-0107-12	Proposed onion conditioning store	Granted	08/02/12
H13-0880-11	Proposed general-purpose store	Granted	10/11/11
H13-0845-11	Proposed photovoltaic panels to barn roof	Granted	01/11/11
H13-1018-08	Change of use of land for storage purposes in conjunction with existing onion storing and grading business including construction of hardstanding (retrospective)	Granted	01/05/09
H13-0151-06	Proposed extension to existing warehouse	Granted	14/04/09
H13-1292-91	Steel framed extension to existing agricultural building	Granted	09/12/91
H13-1129-89	Extension to pre-pack	Granted	13/09/89
H13-0202-88	New building and lean-to for onion store	Granted	23/03/88
H13-1036-85	Agricultural storage building with canteen and toilets	Granted	19/11/85
H13-0453-83	Erection of steel-framed vegetable packing building	Granted	21/07/83

Table 1 – Moulton Bulb Co. Ltd Planning History

4 THE PROPOSAL

- 4.1 The proposal is for the installation of a ground-mounted solar array and substation on land at Moulton Bulb Co. Ltd. The panels would be 0.85m in height at the lowest point and 2.33m at the highest point and arranged in uniform rows as shown on Drawing No. SOLDOM11813 PSP. The transformer base and inverter station are located in the centre of the site and underground cables will transport the energy to the existing transmitter to the south, as shown on drawing no. SOLDOM11813 PSP.
- 4.2 It is proposed to erect a perimeter fence enclosure around the solar array for security purposes. A green welded mesh fence is proposed, details of the fence are shown on Drawing No. SOLDOM11813 ISTXD. Given the location and nature of the development, it is not anticipated any security lighting or CCTV facilities will be required.
- 4.3 Access for installation and occasional maintenance of the panels will be via the existing access from Broad Lane to the site.
- 4.4 A site compound area would be set aside during the proposed construction phase and this area of land is located within the main complex area with access for construction vehicles via the main entrance off Broad Lane. The area is already used for vehicle storage and is well-screened from the adjacent ploughed field and application site by established screening.



Photograph 3: Proposed Site Compound



Photograph 4: Proposed Site Compound

- 4.5 The use will be temporary for the life of the array, estimated to be approximately 30 years. The solar panels and all associated equipment would be removed from the site and the site returned to its former condition once the solar panels are no longer operational.
- 4.6 The scheme would provide renewable energy for Moulton Bulb's own operations (approx. 21% of the site's energy requirement).

5 PLANNING POLICY

NATIONAL PLANNING POLICY FRAMEWORK (NPPF), 2021

- 5.1 The NPPF is a material consideration for this application.

Achieving Sustainable Development

- 5.2 Paragraph 8(c) of the NPPF states: -

“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);

*c) an **environmental objective** – to contribute to protecting and enhancing 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”.*

Making Effective Use of Land

- 5.3 Paragraph 120 (a & b) of the NPPF states: -

“Planning policies and decisions should:

a) Encourage multiple benefits from both urban and rural land, including through mixed-use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside.

b) Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production”.

Comment

- 5.4 The proposal would help contribute towards the council’s net-zero carbon targets by 2050 and the benefits yielded by the proposal in terms of climate change are a material consideration of significant weight in favour of the proposal, balanced against the impact on the character of the area where no harm would arise. The location of the solar array on a small parcel of agricultural land is considered an

appropriate use of the site where it would be well screened from wider views from existing and proposed planting and where it is a temporary use where following the decommissioning of the solar array at the end of its lifespan (30 years), the land would be returned to agricultural production.

Conserving and Enhancing the Natural Environment

5.5 Paragraph 174a states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity of geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)”.

Comment

5.6 A Preliminary Ecological Assessment accompanies this application and has assessed the baseline ecological data to inform the proposed development. The appraisal concludes that the proposal can proceed without adverse impacts upon legally protected/priority species and habitats provided the specific mitigatory guidance and enhancement recommendations identified within section 5.2 of the report are fully adhered to. These include general precautions during the construction phase and additional plantings along the road frontage of West Cob gate, the boundary shared with Peloton Produce to the north. The report concludes that there is an overall net gain in biodiversity and a biodiversity net gain calculation accompanies the submission.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

5.7 Paragraph 152 sets out 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 help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

5.8 The document goes on to advise at paragraph 157:

“In determining planning applications, local planning authorities should expect new development to:

comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and

take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”

5.9 Paragraph 158 of the NPPF states:-

“When determining planning applications for renewable and low carbon development, local planning authorities should:

- 1) Not require applications 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*
- 2) Approve the application if its impacts are (or can be made acceptable). Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas”.*

National Policy Overview

5.10 There is a significant body of national energy policy support for renewable and low-carbon development. This support is rooted in the Government's policy of growing the economy in a decarbonising way and achieving its recently set legally binding target of net-zero greenhouse gas emissions by 2050. To help achieve this, the Government is rapidly seeking to transition from a traditional fossil fuel-dependent economy to increasing amounts of secure and resilient renewable and low-carbon energy, including solar power.

5.11 The NPPF sets out the Government's planning policies for England and how these should be applied. At its core is the need for the planning system to contribute to the achievement of sustainable development – meeting the needs of the present without compromising the ability of future generations to meet their own needs.

- 5.12 Renewable energy projects are identified in the NPPF as an important form of sustainable development. There is no requirement to demonstrate the overall need for renewable energy.
- 5.13 The National Planning Policy Framework (NPPF) requires the presence of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) to be taken into account alongside other sustainability considerations. Best and most versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification. However, the NPPF also recognises the need to support the diversification of agricultural land that helps to sustain an agricultural enterprise. This proposal is fully in compliance with these objectives which would ensure the viability of the business in the future.

SOUTH EAST LINCOLNSHIRE LOCAL PLAN (2019)

- 5.14 The South East Lincolnshire Local Plan was adopted in 2019 and is a material consideration for this application.

Policy 1 – Spatial Strategy

- 5.15 Policy 1 states that development in the countryside will only be permitted where it 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. The supporting text to the policy states that *“some land uses may also require a countryside location because of their functionality, such as the plant and equipment of public utility providers”*.

Comment

- 5.16 The array constitutes sustainable development where it will produce renewable energy for Moulton Bulb Co. Ltd.'s own operations and, therefore, this location meets the objectives in Policy 1 above.

Policy 2 – Development Management

- 5.17 The policy requires sustainable development considerations to be met, including:
- 1) *size, scale, layout, density and impact on the amenity, trees, character and appearance of the area and the relationship to existing development and land uses;*
 - 2) *quality of design and orientation;*
 - 3) *maximising the use of sustainable materials and resources;*

- 4) *access and vehicle generation levels;*
- 5) *the capacity of existing community services and infrastructure;*
- 6) *impact upon neighbouring land uses by reason of noise, odour, disturbance or visual intrusion;*
- 7) *sustainable drainage and flood risk;*
- 8) *impact or enhancement for areas of natural habitats and historical buildings and heritage assets; and*
- 9) *impact on the potential loss of sand and gravel mineral resources.*

Policy 3 – Design of New Development

5.18 The policy sets out that, where relevant, all development must:

- Protect the landscape character.
- Protect residential amenity.
- Mitigate flood risk.
- Incorporate existing hedgerows and trees and provide appropriate new landscaping to enhance biodiversity.

Comment

5.19 In response to Policies 2 and 3, any impact on residential amenity as a result of the proposal is likely to be negligible. The Glint and Glare Assessment submitted confirms that there is no or low impact and no mitigation is required. There is potential for disturbance during the construction and decommissioning phases and a Construction Management Plan can be submitted detailing how this will be managed and can be dealt with via a suitable planning condition attached to any consent.

Policy 4 – Approach to Flood Risk

5.20 The policy requires development on sites over 1 hectare in size within Flood Zone 1 to demonstrate that surface water from the development can be managed and will not increase the risk of flooding.

Comment

- 5.21 A Flood Risk Assessment is submitted with this application and confirms that the site is located within Flood Zone 1 and has a low flood risk from all sources with no flood mitigation measures required. The proposal will not pose an increased flood risk to the site or surrounding area.

Policy 28 – The Natural Environment

- 5.22 Part 3 of the policy relates to the ecological network and requires all development proposals to provide a biodiversity net gain through conserving and enhancing the biodiversity value of land.

Comment

- 5.23 In respect of Biodiversity Net Gain (BNG), the ecology report confirms that the proposals will result in a net gain of 51.82% area habitat units and a 215.02% net gain in hedgerows/trees on site.

Policy 30 - Pollution

- 5.24 The policy states that *“developments proposals will not be permitted where taking account of any proposed mitigation measures, they would lead to unacceptable adverse impacts upon:*

- 1. health and safety of the public;*
- 2. the amenities of the area; or*
- 3. the natural, historic and built environment; by way of:*
- 4. air quality, including fumes and odour;*
- 5. noise including vibration;*
- 6. light levels;*
- 7. land quality and condition; or*
- 8. surface and groundwater quality.”*

- 5.25 The policy goes on to state that planning applications must include an assessment of the impact on amenity from existing uses.

Comment

- 5.26 There is full compliance with this policy where the Landscape Visual Impact Assessment confirms that there would be minimal impact on the wider rural setting and where new planting would improve the condition of the landscape character over time. In addition, the Glint and Glare Assessment submitted with this application demonstrates screening in the form of existing vegetation and/or buildings is predicted to significantly obstruct views of reflecting panels and, therefore, no impact is predicted and no mitigation required.

Policy 31 – Climate Change and Renewable and Low Carbon Energy

- 5.27 Policy 31 sets out that renewable energy proposals must not cause significant harm to visual amenity, landscape character or quality, or skyscape considerations. Part B of the policy sets out the circumstances in which renewable energy facilities, associated infrastructure and the integration of decentralised technologies will be permitted. Such development *“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 development ceases to be operational.”

Comment

- 5.28 The proposal is in accordance with the criteria at part B of the policy. The visual impact of the proposal will be mitigated through retained and enhanced landscaping and boundary treatments. In terms of the impact on residential amenity, the Glint and Glare Assessment concludes that existing built form and vegetation provides suitable screening and therefore no mitigation is required. Highway impacts will be limited to the construction and decommissioning phases and vehicle movements associated with a solar array are limited. In respect of agricultural land take, the proposed use is temporary, and the solar array will be removed at the end of its

operational life. An agricultural use will continue where there is the potential for sheep grazing. There is no conflict anticipated with aviation and radar safety and there are no heritage assets nearby.

6 PLANNING CONSIDERATIONS

6.1 The key planning considerations material to this application are:

- Visual Impact and Impact on Character of Area.
- Amenity Impact on Residential Neighbours.
- Land Use and Agricultural Land Classification.
- Glint and Glare.
- Ecology and Biodiversity Net Gain.
- Landscaping.
- Trees.
- Highways.
- Flood Risk.

Visual Impact and Impact on Character of Area

6.2 The location proposed for the solar array is within part of an agricultural field and is partially enclosed by a landscaped bund, tree screening, and industrial buildings. There are currently limited views available from West Cob Gate and new infill plantings are proposed to further screen the development. There are no Public Rights of Way through or adjacent to the site. There will be limited visual effects due to the low-rise nature of the development and the extent of existing vegetation/buildings. As a result, the visual impact of the proposal would be minimal and localised.

6.3 Although the solar array is proposed on land which is currently open, due to its moderate scale and visual containment through additional peripheral landscaping, it would have a minimal effect on the character and appearance of the area.

6.4 The rural character of this area would be maintained from wider public views available from the surrounding area. The existing vegetation along boundaries would remain and be supplemented by additional landscape planting to ensure that the proposal has no detrimental impact on the character and appearance of the area. As such, there would be no conflict with Local Plan Policy 3 which requires the retention of existing hedgerows and trees and the provision of appropriate new landscaping to enhance biodiversity and green infrastructure. These Local Plan policy objectives are consistent with those of the NPPF.

Amenity Impact on Residential Neighbours

6.5 The nearest residential dwellings are:

- 117 – 155 Broad Lane to the east and south-east of the site.
- Properties on Lowther Avenue approximately 600m to the north-east of the site.
- Cobgate Farm on the corner of West Cob Gate and Delgate Bank approximately 650m to the north-west of the site.

6.6 In terms of loss of outlook, given the separation distance, the closest properties being bungalows (117-136 Broad Lane), and the single-storey nature of the development, it is not considered there would be any harm to residential amenity.

6.7 Construction works have the potential to result in noise and vibration impacts due to activities associated with plant use and construction vehicle movements. These impacts are likely to be localised and temporary in nature over the duration of the construction works. Following the construction phase, no effects from noise and vibration are considered likely.

6.8 It is considered that the proposal would not have a detrimental impact on the living conditions of nearby residents with particular regard to outlook or noise. Accordingly, there would be no conflict with Policy 3 or 31 of the Local Plan which seeks to protect residential amenity. The development would also be in accordance with the NPPF which seeks to ensure that developments provide a high standard of amenity for both existing and future users.

Land Use and Agricultural Land Classification

6.9 The use of the land is agricultural and has been used for onion growing. Although crop growing and harvesting would not be possible, sheep grazing can occur under the solar panels and this diversification would ensure there would be no loss of agricultural land. In any event, the temporary loss of a small amount of agricultural land is outweighed by the benefits of providing renewable energy.

6.10 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.

- 6.11 The proportion of agricultural land utilised for the solar array and taken out of production from the Company's wider land ownership is approximately 0.42%, therefore minimal. The benefits of resting this small parcel of land for 25 years will enable soil-rich improvements for agricultural production and biodiversity that would not otherwise be available in the absence of the development.

Glint and Glare

- 6.12 A Glint and Glare Assessment has been carried out by Pager Power and is submitted with this application. The assessment concludes that the solar panels will not have any significant impacts upon road users, dwellings, or aviation activity and therefore no mitigation is required.
- 6.13 In respect of the impact on roads, the assessment found solar reflections are geometrically possible along a 0.1km stretch of the B1357. Existing built form and vegetation significantly obstructs views of the panels and therefore no impact is predicted, and no mitigation is required.
- 6.14 In terms of the impact on dwellings, the report assessed 82 dwellings and found that solar reflections are geometrically possible towards 11 of these. Existing built form and vegetation provides suitable screening, and no mitigation is required.
- 6.15 In relation to aviation impacts, the assessment considered the impact on Cowbit Airstrip and Fenland Airfield. No significant impacts on aviation activity are anticipated at either airfield and detailed modelling is not required from a technical perspective.

Ecology and Biodiversity Net Gain

- 6.16 Planning policy guidance at both national and local levels seeks to ensure that biodiversity is conserved and enhanced and that mitigation measures are put in place to prevent damaging impacts. A Preliminary Ecological Appraisal (PEA) incorporating DEFRA Metric Calculations has been carried out by T4 Ecology Ltd in accordance with the NPPF and Local Plan Policy 28.
- 6.17 In summary, the proposed development area comprises a section of arable field, located adjacent to arable land use, agricultural industry, roads, and residential dwellings. The site and immediate surroundings are subject to management/disturbance as would be reasonably expected in such a land use context. The statutory designation search undertaken as part of the desk study

identified that the site is not situated within nor bounding any statutory or non-statutory designated locations.

- 6.18 The application site is a large arable field and, with the exception of the existing buffer planting along the southern boundary which would be fully retained, there are no trees lines or hedgerows situated on site. Consequently, small numbers of bats may commute and forage given the limited habitat/network on and adjacent to the site. All existing trees/planting would be retained, with additional planting of native trees and hedgerows planted as part of the proposal, as illustrated on the landscape plan. As such, it is considered reasonable to conclude that any bat behaviours would continue unaffected by the proposal.
- 6.19 In terms of protected and priority species, the PEA confirms that it is not reasonably likely that reptiles or great crested newt species would be adversely affected by the development proposals. No active or inactive badger setts were found, with no evidence of badger activity identified and consequently, no surveys have been advised. Further bat surveys are considered to be neither necessary nor appropriate.
- 6.20 General appropriate precautionary measures for the construction phases have been advised in section 5.2 of the PEA, including specific precautionary actions for water voles given the recorded presence of the species in Moulton Mere located just offsite to the west. Appropriate recommendations in respect of due diligence relating to nesting birds and ecological enhancements have been made in section 5.2 of the report.
- 6.21 In respect of Biodiversity Net Gain (BNG), from a baseline of 11.32 area habitat units, the post-development habitat units are calculated as 17.19 habitat units, representing a net gain of 51.82% area habitat units. In respect of linear features, from a baseline of 1.04 hedgerow units, post-development the proposal would present 3.28 hedgerow units, with a net gain of 215.02%.
- 6.22 The PEA concludes that the proposal can proceed without adverse impacts upon legally protected/priority species and habitats provided the specific mitigatory guidance and enhancement recommendations identified within section 5.2 are fully adhered to. Where necessary, appropriately worded conditions should be placed upon any consent granted in order to ensure appropriate measures are followed.

- 6.23 Overall, the recommendations for enhancement and ongoing management would result in significant biodiversity net gain. The biodiversity enhancement measures identified will bring about substantial biodiversity enhancements for the site.

Landscaping

- 6.24 A landscape scheme has been produced for the proposed development and is shown on Drawing No. 2022_44_001. The landscape proposals have been kept simple and low maintenance and include the site laid to grass with the provision of new trees and hedging (including field maple, cherry, oak, and rowan trees, and hawthorn and hazel hedges) along the northern boundary.
- 6.25 A Landscape Visual Impact Assessment (LVIA) also accompanies the application. As a summary overview, it finds that solar panels in this location would have a small degree of impact on the local landscape and this would be largely limited to the immediate area, therefore not detracting from the wider local environment. Over time the visual impact of the solar array would soften as the proposed new planting matures. The LVIA concludes that the proposals are appropriate to the scale and wider landscaping surrounding the site and the proposed new planting will improve the overall condition of the landscape character.
- 6.26 There will be negligible harm to the character and appearance of the area as a result of the proposals and any perceived harm would be very localised, temporary, and reversible where the solar panels are low-level and the proposals have been sensitively designed.

Highways

- 6.27 The application site can be reached by an established vehicular access off Broad Lane, the entrance into the main complex of warehouses, offices and packing areas will be used during the installation of the solar array. This area is currently used for parking of HGV's/storage and is well-screened – see site compound area plan attached.
- 6.28 In transport and access terms, the effects of the construction phase will be more significant compared to the operational phase, which is not expected to generate any significant traffic movements. However, the construction phase would be for a limited time and the site is easily accessible from the entrance at Broad Lane and

wider surrounding road network and would not lead to any significant cumulative impacts.

- 6.29 There are no issues anticipated during the construction phase. However, the Highways Authority may require a construction management plan dealing with public safety, amenity, and site security. Details such as traffic management, site compound areas for deliveries, hours of construction (limited to daylight hours) can be provided and dealt with by condition, if considered necessary.
- 6.30 During the operational phase, there is anticipated to be one vehicle visit to the site every six months for maintenance. These would typically be made by a light van or 4x4 type vehicle.
- 6.31 During the decommissioning phase, as with the construction phase, this would be for a limited time and all environmental effects in relation to transportation for the decommissioning phases are considered to be temporary and negligible.
- 6.32 In light of the information above, it is concluded that the likely transport and access impacts associated with the proposed development, including any cumulative impacts, are unlikely to result in significant adverse impacts on the environment.

Flood Risk

- 6.33 As the site exceeds 1 hectare in flood zone 1, a Flood Risk Assessment has been prepared by Considine in accordance with the requirements of the NPPF and Local Plan Policy 4.
- 6.34 The Flood Risk Assessment concludes that the site is located within flood zone 1 and has a low flood risk from all sources with no flood mitigation measures required. Surface water run-off from the solar panels will discharge directly to the field and run-off rates following development will replicate existing pre-development rates to the watercourse. The proposal will not pose an increased flood risk to the site or surrounding area.
- 6.35 The report confirms that there will be no significant increase in flood risk to the watercourse and subsequent land within or downstream of the site. The whole approach to drainage contributes to the sustainable credentials of the site and proposed development.

The Need to Support Diversification of Agricultural Land

- 6.36 The proposal supports the diversification of agricultural land and helps to sustain an agricultural enterprise. The proposal would temporarily remove 22,436sqm of land from the local supply of agricultural land. In the context of the wider land ownership of Moulton Bulb Co, the application site constitutes just 0.42% of the land holdings and Moulton Bulb Co. will be able to continue to function as a viable agricultural enterprise with the solar array in situ.
- 6.37 The application site has been carefully chosen and considered against the wider land holdings of Moulton Bulb Co. All the land under their ownership is Grade 1 silt, there are no lower-quality pockets of land owned by the company and within the vicinity of the application site that could be developed. The company has explored alternative options, including a rooftop solar array, however not all roofs on site are developable due to age and composition i.e. asbestos and non-composite panel roofs.
- 6.38 Moulton Bulb Co has a relationship with a local farmer and discussions are ongoing in relation to sheep grazing occurring concurrently with the PV array. Sheep grazing will ensure no loss of agricultural land and will help manage vegetation growth under the panels.
- 6.39 It should be noted that the change of use of agricultural land to commercial including cold store extension at Peloton Produce approved (ref: H13-0599-22) in October 2022 is being constructed on land which, until recently, was owned and farmed by Moulton Bulb Co. The Officer Report for the application makes no reference to the loss of agricultural land. The proposed solar array is a temporary use and does not result in the loss of agricultural land.

Energy Requirements

- 6.40 The company is exposed to volatility in the energy market. The proposed solar array would reduce reliance on the energy market and provide stability for the business. The company currently uses approximately 7.25GWh of electricity per year. The use of solar power would reduce the company's exposure to increased energy prices and maintain the viability of the business, especially in the current climate of the energy market. The installation would supply approximately 21% of the site's energy requirement.

- 6.41 Moulton Bulb Co. have the desire to continue onion storage, grading and packing and to increase onsite cold storage which would, in turn, increase energy demand for the site whereby onions are a long-term cold store product. The use of long-term cold stores reduces the UK reliance on imported products from Europe (Holland and Spain) and Southern Hemisphere supply from Egypt, New Zealand, and Australia.
- 6.42 The array will help Moulton Bulb Co. meet its Net Zero requirements whilst mitigating risk in the energy marketplace by virtue of onsite generation. Their customers require them to enter Renewable Energy Guarantees of Origin (REGO) backed electrical supplies, which comes at a premium, and on-site generation would help to mitigate risk to this premium.
- 6.43 Western Powers infrastructure does not allow for exporting into the national grid and therefore the energy generated from the array will be solely for the use of Moulton Bulb Co.

7 CONCLUSION

- 7.1 The proposed development is for the installation of a ground-mounted solar array on land at Moulton Bulb Co. Ltd.
- 7.2 The site offers a good opportunity for the development of a standalone solar photovoltaic scheme. The proposal brings about the opportunity to significantly reduce Moulton Bulb Co.'s carbon footprint and help meet net zero carbon energy targets.
- 7.3 The proposed scheme aligns with National and Local Plan Policy for renewable and low-carbon development set out in the National Planning Policy Framework and the Council's Climate Action Plan.
- 7.4 The existing access from Broad Lane to the main operation area and site compound area provides suitable construction access and it is not anticipated that will be any highway safety impacts arising due the construction, operational, and decommissioning stages.
- 7.5 The impact of the proposed development on the living conditions of neighbouring residential properties would be negligible. The distance and intervening landscape berm would provide adequate robust visual screening.
- 7.6 It is reasonable and necessary to limit the period of the permission and to require that the site is decommissioned when energy generation ceases.
- 7.7 The overall benefit of the scheme is its production of renewable energy which would help mitigate the impacts of climate change and positively contribute to the Council's sustainability targets. The proposal is therefore fully in accordance with Local Plan Policies 1, 2, 3, 4, 28, 30, and 31 and Paragraphs 8, 120, 152, 157, 158, and 174 of the National Planning Policy Framework and planning consent should be granted.