PACE
PATHFINDER CLEAN ENERGY

Tydd Solar Farm

Planning Design and Access Statement

April 2024

UKZ157 Tydd Solar Farm

Report Version - Submission

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1.0 Summary

This Statement is submitted in support of a planning application to both Fenland District Council (FDC) and South Holland District Council (SHDC) for full planning permission for:

"Temporary ground mounted solar photovoltaic (PV) farm with battery storage, substation and associated works."

The application site is located on approximately 140.5 hectares of land to the east of Guanockgate Road, Gorefield, Lincolnshire. The site postcode is PE13 4PL. This includes land for landscaping and biodiversity measures. The proposed solar farm will have a capacity of approximately 49.9MW using solar panels fixed to the ground via metal piles and supporting infrastructure. This translates into generation of approximately 69.4 Gigawatt hours (GWh) of clean renewable energy each year which will be distributed to homes and businesses via a connection on-site to the local electricity grid . This will be enough to power in excess of 22,388 homes and offset over 16,200 tonnes of CO_2 per year.

A public consultation exercise was held through a specially designed website (http://www.tyddsolar.co.uk) which also included an in-person consultation event on 30th November 2023 at Sutton St Edmund Village Hall. Flyers were circulated to nearby properties informing residents of the event.

The community's anticipated concerns and suggestions will be taken into account and an updated summary of any concerns raised will be presented along with our response post submission and as part of the ongoing dialogue with officers at both Fenland and South Holland DC. Details of community consultation are set out in Section 6 on this Statement.

1.1 Delivering significant sustainability benefits

The four purposes of the proposed development are to:

- Support the UK's goal of net-zero carbon by 2050 and to contribute to the climate emergency declared by the Government and FDC.
- Facilitate the transition to a zero carbon energy system by generating renewable energy.
- Significantly increase the biodiversity of the site.
- Enable the continuation of farming by the grazing of livestock throughout the operational period.

In October 2018, a special report into global warming by the Intergovernmental Panel on Climate Change (IPCC) warned that the impacts of climate change will be much more severe if global temperatures rise to 2°C above pre-industrial levels, compared to the effects of a 1.5°C rise.

The IPCC's 2021 report on climate change (Sixth Assessment Report) suggested that the case for further evidence of human-induced climate change has strengthened since their 2018 report.

Added weight was given to the need to act as per, on 27th February 2022, by 195 member governments of the UN IPCC. Their latest report highlighted the urgency of action needed by governments and decision makers.

The UK has been relatively successful in reducing greenhouse gas emissions over the past decade by enabling significant development of wind and solar projects, coupled with closure of a majority of coal fired power stations and a commitment by the Government to close the remainder by 2024. The UK achieved its first months with zero coal power generation in spring and summer 2020, the longest period since the 1880s.

The challenges this poses have been recognised by both SHDC and FDC.

SHDC, who, as part of their Climate Change Strategy 2022, in partnership with East Lindsey District Council and Boston Borough Council have identified climate change as a *"one of, if not the greatest, challenge facing our society"* with the purpose of the document to "*to provide direction around how to achieve a more sustainable future across South Holland, Boston and East Lindsey as we all work towards a shared net zero target"*.

FDC, as part of their draft Local Plan have identified climate change as a Strategic Priority for the district stating that Council will aim to *"reduce and manage flood risk, improve community resilience and ensure that Fenland adapts to climate change."* Additionally, emerging Policy LP4 sets out FDCs vision and objectives in *"supporting a transition to a low carbon future*."

Furthermore, the scheme will reduce reliance on imported gas and will improve the resilience of the electricity grid and contribute to the Government's commitment to Britain becoming a net exporter of energy by 2040[1]. The renewable energy generated will contribute to the recent British Energy Supply Strategy[2] ambition for a five-fold increase in new solar power by 2035, from 14,000MW today to around 70,000MW. This will be secured by *"amending planning rules to strengthen policy in favour of development on non-protected land."*.

The farm currently comprises mostly arable land. The nature of modern farming practices diminishes the ecological value of the site and surrounding hedgerows and trees. While grazing can be introduced throughout the operation of the solar farm, it will be less intensive with some areas left free of animals, thereby allowing the land to regenerate and for the site to be managed for its ecological value. A Biodiversity Net Gain Assessment confirms that habitats will increase by around 173%.

[1] Prime Minister Liz Truss's opening speech on the energy policy debate, 8 September 2022 https://www.gov.uk/government/speeches/pm-liz-trusss-opening-speech-on-the-energy-policy-debate
[2] British Energy Supply Strategy - Secure, clean and affordable British energy for the long term, April 2022

The result will be an area providing continued agriculture, significant ecological benefits, a more interesting and varied landscape as well as renewable energy generation.

The solar farm will contribute significantly towards social sustainability by indirectly providing low cost, clean power to businesses, contributing business rates and employing local people during construction. The additional power supplied to the grid will help support the growing electricity needs of communities and businesses in the area.

Economically, the regular income from the solar farm will make an important contribution to the continued viability of the farm holdings, including investment in farming activities and protecting themselves during years of low agricultural yield. This is becoming increasingly important as a changing climate affects agricultural yields.

Post-Brexit, farming subsidies are changing. Reductions are being phased over several years and farmers are being encouraged to introduce environmental projects on their land. The proposed development, which combines renewable energy, biodiversity enhancements and continued agriculture is an ideal example.

1.2 Complies with planning policy

The National Planning Policy Framework (NPPF) is clear that *"the planning system should support the transition to a low carbon future… and contribute to radical reductions in greenhouse gas emissions"* [Paragraph 157], support the development of the local economy, and encourage *"the development and diversification of agricultural and other land-based businesses"* [Paragraph 88b].

At the local level, SHDCs adopted Local Plan, the South East Lincolnshire (SEL) Local Plan (March 2019) Policy 31 (Climate Change and Renewable and Low Carbon Energy) requires that *"All development… to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated…"*

Additionally, Fenland Local Plan (May 2014) Policy LP14 (Responding to Climate Change and Managing the Risk of Flooding in Fenland) states that "In order to address the… urgent need to combat the causes of, and adaptation to, climate change" along with 7 other listed resource issues, *"All developments (dwellings and non-dwellings) are encouraged to incorporate on site renewable and/or decentralised renewable or low carbon energy sources, water saving measures and measures to help the development withstand the longer term impacts of climate change."*

Paragraph 85 of the NPPF requires that planning decisions *"should help create the conditions in which businesses can invest, expand and adapt."* The NPPF expects planning policies to encourage *"sustainable economic growth"* and to identify *"strategic sites"* that are in need of

investment and where such growth can occur. Where there are *"barriers to investment, such as inadequate infrastructure"* (para 86c), these should be addressed.

In this regard, the principle of a solar farm is supported by national and local policy.

In line with both national and local policies, solar energy provides affordable and secure renewable energy supplies which can be used for future growth and development of homes and businesses in the surrounding area. A solar scheme in this location provides considerable value to enhance the employment offering in the locality.

A separate site search document demonstrates that in the context of the unconstrained policy need for new renewable energy capacity set by NPPF paragraph 163 and the technology's locational requirements , solar farms should be located where there is capacity to connect to the electricity grid unless material policy reasons indicate otherwise. Grid analysis has identified capacity at the identified point of connection (as shown in the site search document) and PACE has approached landowners within a reasonable study area around this point of connection.

The chosen site has willing landowners and is available for development now and therefore is considered *deliverable*. (Further details of the methodological approach adopted by PACE is set out in the site search document). The site is large enough to accommodate a viable project; avoids designated areas and has been demonstrated in this Statement to, on balance, be acceptable with regard to all physical, environmental, policy and amenity constraints.

The site search assessment demonstrates that the use of agricultural land is necessary, that poorer quality land has been used in preference to high quality, and that agriculture can continue throughout the operational period while encouraging additional biodiversity within the area.

There is no loss of any agricultural land as the temporary development will be completely removed at the end of the 40 year operation.

In addition to the proposed development being acceptable in principle and sustainable, the surveys that accompany the application have demonstrated that the design can mitigate any effects in terms of the full range of policy requirements. The following assessments form part of the application:

- A Landscape and Visual Appraisal (LVA) (November 2023), supported by photomontages, concluded that the site presents an acceptable level of effects on the character of the local landscape and visual amenity with the proposed mitigation measures in place. The character of the local landscape and its underlying intensive agricultural, rural and settled character would prevail and would not be materially changed.
- A Heritage Impact Assessment (HIA) (October 2022; updated November 2023) concluded the proposals would not impact the setting of heritage assets including listed buildings

close to the site. PACE wrote to Historic England seeking pre-application advice, however, at the time of writing the applicant is awaiting a response.

- An Archaeological Impact Assessment (AIA) has been instructed and will be submitted as part of the application. As part of the AIA baseline work, pre-application advice was sought from Lincolnshire County Council (LCC) and Cambridgeshire County Council (CCC). Both county council's recommended geophysical survey across part of the site, the results of which will be presented post-submission along with any trial trenching if this is required. The AIA will be concluded following this work and submitted accordingly.
- A Preliminary Ecological Appraisal (PEA) (August 2022; updated October 2023) did not recommend any further protected species surveys are undertaken. The study found the site to have an ecological value with considerable opportunities to enhance biodiversity across the site. The implications of the PEA are discussed in more detail under Section 8 of this Statement. An Ecological Impact Assessment (EcIA) brings together the various ecology strands and concludes that from an ecology perspective this is acceptable.
- A Biodiversity Net Gain Assessment (BNGA) (November 2023) confirmed that the development would deliver significant biodiversity enhancements.
- A Mitigations and Enhancement Plan (MEP) (November 2023) marks out the biodiversity and ecological mitigation measures across the site that would make the development acceptable without harming habitats or species on or near the site.
- In terms of its impact on the highways network and on traffic and safety, the Transport Statement (February 2024) submitted with the application, demonstrates that the proposal will not have an adverse impact. The statement demonstrates how all key components have been addressed and how the scheme responds appropriately in this regard.
- The Flood Risk Assessment (FRA) and Surface Water Management Plan (November 2023) noted that the site falls within Flood Zone 3, however, with adequate flood risk mitigation, the site is considered acceptable in policy terms and would accord with the requirements of the NPPF.
- Agricultural Land Classification (ALC) Survey (July 2022) classifies the majority of the site as Grade 3a ('good') rather than as Grade 2 ('very good') as per Natural England's Regional Agricultural Land Classification Maps. A site search document has been submitted with the planning application which demonstrates the acceptability of the choice of site in this location including consideration of the use of agricultural land and demonstrates that the lower agricultural land has been used in preference to higher grade agricultural land which is abundant in the area.
- A Noise Impact Assessment (NIA) has been undertaken to assess the impact of noise from the development on to the nearest neighbouring properties. Typically solar panels themselves produce no noise and ancillary equipment such as the inverters are

ultimately only active during the day rather than at night. Consequently, it was considered sufficient to ensure inverter cabins and substations are located at least 250m away from residential properties to minimise the likelihood of noise disturbances. Additionally, the proposed development contains a 30MW capacity Battery Energy Storage System (BESS). These units can produce noise throughout the day and night depending on their use. Because of this, the BESS system has been located at the centre of the site, away from residential properties, and includes noise mitigation fencing. On this basis, the scheme avoids material adverse impacts on nearby residential properties in terms of noise disturbance.

- The scheme will not result in any significant pollution. Potential nuisance would be limited to *construction only* short-term noise through vibration, vehicle movements, and dust. This will be limited to ensure that there are no unacceptable impacts arising to nearby residential properties and these matters can also be adequately controlled by planning conditions. No artificial lighting will be used, and should it be required for emergency maintenance then it will be temporary. All other potential impacts on amenity have been considered, including through the operational (post-construction) stage of the project and the scheme accords with policy in this regard and avoids any potentially unacceptable impacts on residential amenity.
- A Fire Risk Statement has been prepared and will accompany the application. This has been done to ensure the BESS component of the scheme has been designed and constructed to the highest fire safety standard.
- A Glint and Glare Assessment (G&GA) has been commissioned to consider the impact of the proposal on surrounding residential, road, aircraft and public rights of way receptors, taking into consideration the proposed mitigation measures. Whilst the results of this assessment will be reported post-submission of the application it is likely that with suitable mitigation comprising mostly tree belts, the scheme is unlikely to result in a glint and glare impact on the surrounding area.
- Construction waste will be managed in a sustainable way.
- A full summary of how harm is avoided / mitigated is set out in the following paragraphs with the more detailed explanation provided in section 8 of this report.

Further details of the planning case are set out in this Statement to demonstrate that not only is the scheme acceptable in all regards when assessed against development plan policies (taking into account the planning balance and significant public benefits delivered) but that it will contribute to the very pressing need to decarbonise the electricity system and deliver a renewable energy project in line with Central and Local policy.

1.3 Delivers against a set of design principles and mitigates any remaining harm

The applicant has followed a robust set of design principles (see Design and Access Statement), which are based on the area's characteristics and informed by discussion with officers, statutory consultees, the community and specialist surveyors.

The layout has been designed to balance the technical design and efficiency of the operation with delivery of these principles. These can be seen on the Layout Plan (Drawing ref. UKZ157_09) and the Mitigations and Enhancement Plan (Drawing ref. UKZ157_10) .

In summary:

- Positioning solar panels at least 0.8m from the ground to allow for the continued grazing of the site by sheep and to mitigate against any surface water flood risk but no more than 3.5m in height to minimise visibility from the surrounding area. Additionally, sensitive equipment will be raised at least 1m from the ground via an earth bund.
- Retaining existing trees adding new native tree belts and shrubbery screens the site from views but also improves the overall biodiversity net gain credentials by 173.6% for habitat units as calculated in the BNGA and illustrated under Drawing referenced UKZ157_10 Mitigation and Enhancement Plan.
- Screening is proposed along the fields in the north western and south western corners of the site, along the central part of the southern boundary and also along the eastern parts of the site. Tree planting with shrub understorey is proposed along the south easternmost field. This will help screen views into the site from the PROW along the southern boundary of the site and from the settlement of Gorefield to the south east. The overall landscape impacts are mitigated to ensure the scheme is acceptable in landscape terms and complies with the respective policies.
- The nearest residential property to the site is approximately 160m away to the north east at Field H. Sections of the proposal that produce noise such as inverters have been set back an acceptable distance in order to reduce noise pollution along with the gapping up of existing hedging to avoid a visual impact. Additionally, the site is approximately 560m from the nearest settlement of Sutton St Edmund to the west and Gorefield to the southeast measuring approximately 1.6km away.
- New wood piles as refugia for reptiles and amphibians will be added close to water sources along with nest boxes as recommended in the PEA.
- Small mammals will be able to pass under the bottom or through the security fencing. Wildlife gates will be included around the site for medium sized mammals.

- The scheme provides for large areas for sheep to graze and the vast majority of the site will be planted in a native wildflower meadow seed mix. This measure alone contributes significantly to increasing the biodiversity net gain of around 173%.
- The maintenance of wide field margins which will improve connectivity between habitats.
- Above ground heritage impacts and below ground archaeology has been considered through working with both Lincolnshire County Council (LCC) and Cambridgeshire County Council (CCC) from the outset so that any relevant issues can be due consideration to ensure that any impacts are acceptable and can be justified.
- To protect amenity, inverters and transformers have been positioned well away from homes and footpaths and should not exceed the minimum levels.
- Matters relating to fire risk are also considered as part of the detailed design.
- The position of the development and in some cases the distance relative to public rights of way (PROW), roads, airfields and residential properties, together with proposed new planting, have been used to minimise any risk of glint or glare.

Accordingly, the environmental, social and economic benefits of the proposed development significantly outweigh any limited adverse impacts, and any residual development impacts have been made acceptable. Accordingly, paragraph 11 of the NPPF advises that the application be approved.

2.0 Introduction

The site straddles both SHDC and FDC and it has been agreed, in accordance with standard practice, that the application will be made to both SHDC and FDC, as both have control to determine over their parcels of land.

This Planning, Design & Access Statement (PDAS) has been prepared on behalf of Pathfinder Clean Energy UKDev Ltd ("the applicant"). It accompanies an application to both South Holland District Council (SHDC) and Fenland District Council (FDC) for full planning permission for:

"Temporary ground mounted solar photovoltaic (PV) farm with battery storage, substation and associated works."

The proposal will have a capacity of approximately 49.9MW (megawatts) using solar panels fixed to the ground via piling, and supporting infrastructure.

The application site is located within Land east of Guanockgate Road, near Sutton St Edmunds, Lincolnshire PE13 4PL as shown on the Location Plan (Drawing ref UKZ157_08) illustrated under Figure 1. An area of around 140.5 hectares will be leased from the landowner to accommodate the development.

The scheme will enable the generation of approximately 69.4 GWh (Gigawatt hours) of clean renewable energy each year which will be distributed to homes and businesses via a connection on-site to the local electricity grid. This is enough to power the equivalent of around 22,388 homes.

The site will be designed to enable continued agriculture in the form of grazing of livestock such as sheep, while also considerably enhancing biodiversity through the change in intensive farming such as arable, to meadow and grazing land.

The scheme will be operational for up to 40 years and so the application is for 40 years from the date of first energisation plus up to 1 additional year each for construction and decommissioning; totalling 42 years. Once decommissioned, the solar panels, battery storage and associated infrastructure will be completely removed and the land returned to its former use. The landscape and biodiversity enhancements introduced through this proposal will remain, and will be compatible with continued agricultural use.

The PDAS provides a description of the development and an assessment of its compliance with national planning policy, local planning policies and other material considerations, including the surrounding context in which it sits.

2.1 Pathfinder Clean Energy (PACE)

PACE brings together a wealth of experience from the development, construction and operation of over 1GW of clean energy projects in the UK and internationally, with a particular focus on solar and battery storage developments. Headquartered in the UK, the company is committed to a sustainable future and is working to create low-carbon energy to the benefit of the environment and the community.

The team includes ecologists, landscape and heritage specialists, flood risk consultants and a range of experts in solar projects who help us to create environmentally friendly solar farms.

PACE has, over the past few years, gained planning approval for large solar farms with battery storage at four sites across Norfolk in the districts of Breckland, Broadland and South Norfolk; Three Bridges Solar (Breckland Council planning ref. 3PL/2020/1134/F); Attleborough Solar (Breckland Council planning ref. 3PL/2021/0236/F); Burgate Solar (Broadland Council planning ref. 20202016) and Maleys Solar (South Norfolk District Council ref. 2022/0509). PACE has also secured permission for a solar farm with battery storage in Lincolnshire (East Lindsey Council ref. S/152/01297/22) and most recently received permission in November 2023 for a solar farm in Mid Suffolk District Council Council (ref. DC/22/02667).

2.2 Document scope

This document provides an explanation of how the proposed development responds to national and local planning policies, and other material considerations.

Section 3 confirms that the application does not need to be accompanied by an Environmental Statement. Section 4 describes the site and its surroundings, while Section 5 describes the solar farm and associated infrastructure.

Section 6 describes the applicant's engagement with officers, stakeholders and the local community. Section 7 describes the national and local planning policy context and Section 8 provides a planning and sustainability appraisal exploring in detail the principle of development and the scheme's sustainability credentials.

Finally, Section 9 provides a Design and Access Statement which explains the thought process behind the design and indicates how, through good design, the scheme can be delivered in a sustainable manner ensuring social, economic and environmental considerations and objectives are met.

The Submission comprises:

- Completed planning application forms and certificate.

- Planning, Design and Access Statement (PDAS) incorporating the Statement of Community Involvement (prepared by Third Revolution Projects)
- Site Search and Flood Risk Sequential Test (prepared by Third Revolution Projects)
- Archaeological Baseline Impact Assessment (prepared by Abrams Archaeology)
- Heritage Impact Assessment (prepared by Abrams Archaeology)
- Ecological Impact Assessment (prepared by AW Ecology)
- Preliminary Ecological Appraisal (prepared by AW Ecology)
- Biodiversity Net Gain Assessment (prepared by AW Ecology)
- Flood Risk Assessment (prepared by Floodline Consulting)
- Surface Water Management Plan (prepared by Floodline Consulting)
- Landscape and Visual Appraisal (prepared by Briarwood Landscape Architecture)
- Arboricultural Impact Assessment (prepared by A.T. Coombes Associates)
- Tree Constraints Plan (prepared by A.T. Coombes Associates)
- Transport Statement (prepared by Apex Transportation)
- Fire Risk Statement (prepared by Jensen Hughes)
- Application Drawings (as listed in this document at Section 5.3)
- Glint and Glare Assessment (prepared by Pager Power)
- Noise Impact Assessment (prepared by Hepworth Acoustics)
- Landscape and Ecological Management Plan (prepared by AW Ecology and Briarwood Landscape)

3.0 Environmental Impact Assessment

The relevant EIA Regulations are set out in the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (EIA Regs) and The Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2017.

Schedule 1 of the EIA Regs includes a list of developments for which an EIA is mandatory. Schedule 2 of the EIA Regs includes a list of developments for which an EIA may be required with reference to the screening criteria included in Schedule 3 of the Regulations.

The proposed development is considered to fall under point 3(a) of Column 1 of Schedule 2, which relates to industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1).

A Screening Opinion has been sought from both SHDC and FDC because, although the site is not in a *"sensitive area"* as defined by the Regulations, the site area is over the 0.5 hectare relevant threshold under Column 2 of Schedule 2 and straddles the boundary of both local authorities.

A decision was received by FDC on 11th October 2022 (Appendix 1) confirming that under the regulations an Environmental Statement is **not** required. A decision was also received by SHDC on 13th October 2022 (Appendix 2) confirming that under the regulations an Environmental Statement is **not** required.

4.0 Site and Surrounding Area

4.1 Application site and surrounding area

The proposed application site consists of approximately 140.5 hectares of agricultural land to the northwest of the town of Wisbech in Cambridgeshire and just over 1.6km to the west-northwest of the settlement of Gorefield.

The site falls across the jurisdiction of both South Holland District Council (SHDC)and Fenland District Council (FDC)with approximately 66.2.hectares of the site within FDC and around 74.3 hectares within SHDC.

The topography of the site is generally flat. The site is bound by Guanockgate Road to the west with the junction of Elloe Bank and Broad Drove West at the northeast of the site. A public right of way (PRoW) intersects the site from north to south along Elloe Bank. Several drains maintained by the North Level District (NLD) Internal Drainage Board (IDB) run across the site. The site is surrounded by agricultural land on all other sides.

The nearest residential property to the east is located approximately 160m to the northeast of Field H along Broad Drove West and the nearest property to the west of the site is located approximately 400m away along Guanockgate Road. To the south of the site the nearest properties are along Elloe Bank and are approximately 490m away from the site.

A public right of way (PROW) passes through the site in a west to east direction along the top of Fields U and I (see Location Plan) and through the centre of the site from north to south. The section of PROW in the western portion of the site till the east of Field I falls within the LCC and SHDC boundary. The section of PROW (a bridleway) beyond intersecting the site from north to south falls within CCC and FDC. The PROW running along the southern boundary of the eastern portion of the site is a byway and falls within CCC/FDC boundary.

Access to the site is via an access track running parallel to the PROW between Fields T an U (which are reached via Guanock Gate Road to the west).

The nearest heritage assets are the Grade II listed Church of St Edmond located 1km to the west of the site, the Grade II Honeyhill Farmhouse located approximately 1.5km south of the site and the Grade II listed Guanock House located approximately 1.1km north of the site. The nearest Scheduled Monument is at Boundary cross (standing cross) at Old Fen Dike measuring approximately 3 km to the north of the site.

The site does not fall within any Conservation Area (CA) nor does it contain any listed buildings..

The entire site falls within Flood Zone 3a and is not subject to any statutory or nonstatutory ecological designations with the nearest designated site being the Nene Washes SPA/Ramsar located 9.3km south of the site.

A series of views of the site from the surrounding area, as per the commissioned photomontages are included in Figure 3 to Figure 5 below.

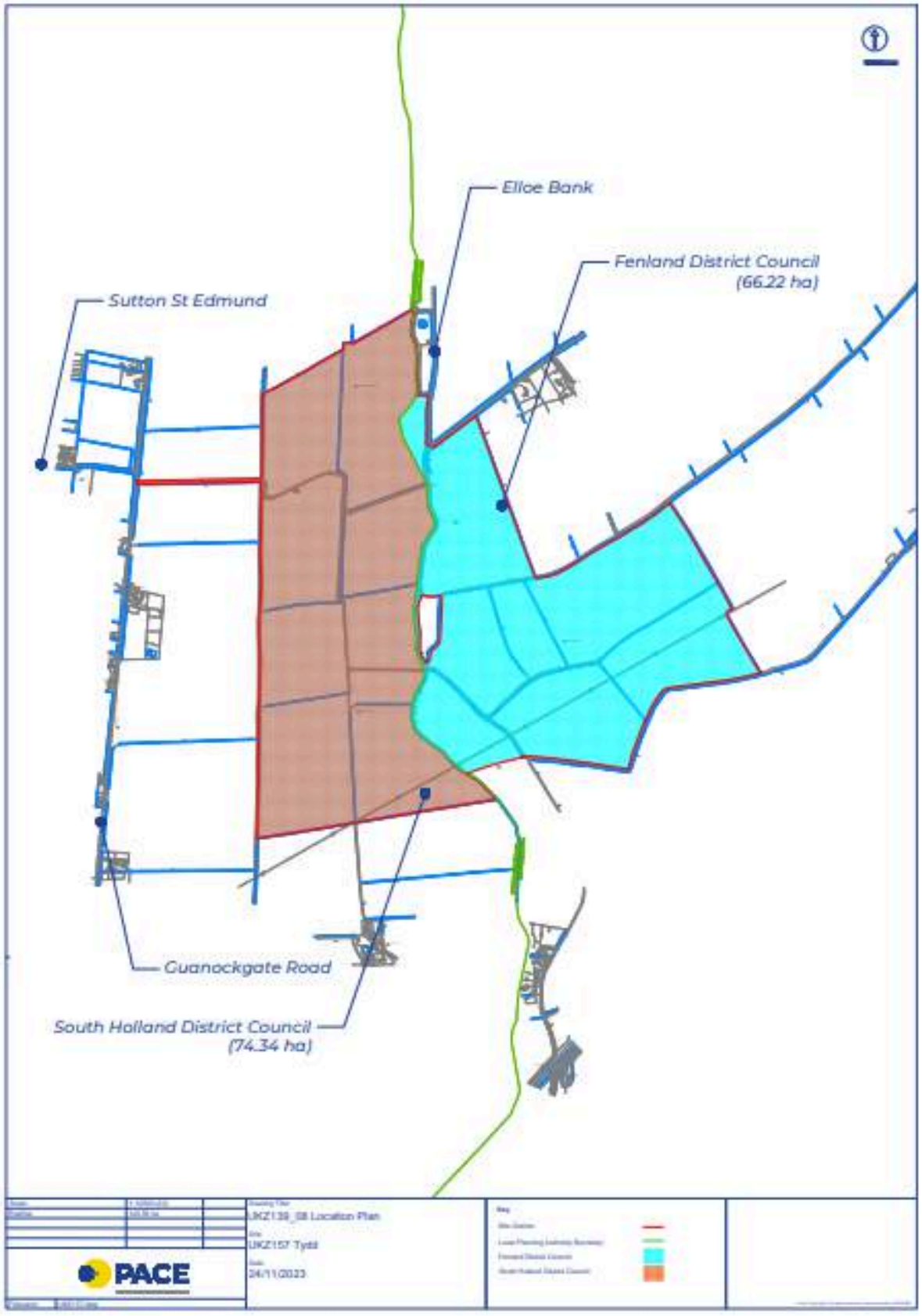


Figure 1 *- Location plan (proposed site within red line)*

Figure 2 *- Layout plan (Solar panels infilled in blue*

Figure 3 *– Part 1; View from Goredike Bank and Turnover Bank looking northwest (Viewpoint 4a as per the Photomontage document ref PCE_003_01A)*

Figure 4 *– Part 2; View from Goredike Bank and Turnover Bank looking north (Viewpoint 4b as per the Photomontage document ref PCE_003_01A)*

Figure 5 *– View from Broadgate Road, Sutton St Edmund looking east (Viewpoint 6 as per the Photomontage document ref PCE_003_01A)*

4.2 Planning history

A planning history search was undertaken to review previous applications on the site and adjoining properties.

The site was subject to an application to both FDC and SHDC for 4 no and 2 no wind turbines respectively measuring a maximum height of 126 metres along with transformers, substation, temporary construction compound, access tracks, hardstanding and associated infrastructure under FDC application reference F/YR11/0113/F and SDHC application ref H19-0081-11. The application was refused by both LPAs on the grounds of adverse visual impact (FDC) and the impact on residential properties within 1km of the scheme (SHDC).

Both decisions were appealed and the Planning Inspectorate dismissed both appeals on the basis of impact on amenity and *"harm in respect of cultural heritage, the interests of horse riders, the visual amenity of the area generally within 3km of the development and landscape impact."*

The site is not subject to any other relevant planning history.

5.0 The Proposed Development

The choice of fields has sought to minimise the effect of the development on the nearest residential properties, principally through distance, but also through screening or a combination of these. The site location is shown on drawing referenced UKZ157_08 Location Plan which accompanies this letter and as per Figure 1 above .

5.1 What is a solar farm?

Solar photovoltaics (PV) collect and convert solar radiation directly into electricity. The technology is commercially proven and large multi-megawatt generation plants have been operating at scale in the UK for many years. Some 14GW (14,000MW) of capacity is currently operational in this country. Some are mounted on buildings, typically supplying the demand within the building, while larger schemes are normally ground mounted and supply power directly to the local electricity distribution network.

Installation costs have reduced dramatically over the past few years and solar farms are now one of the lowest cost forms of power generation available (compared to other renewables, coal, gas or nuclear power). It is expected that the proposed development will receive no public subsidy for its development or operation.

In the dynamic field of solar technology, components such as substations, transformers and inverters as well as solar panels are under constant development. The components and specifications may therefore be subject to minor changes between approval and construction.

In comparison to most other energy generation technologies, solar farms create very few environmental impacts during their construction and operation. During operation, the scheme generates little noise and no air quality issues and is much less visually intrusive than most forms of renewable power.

Minimal maintenance and the long service lifetimes mean that the main effects on the local community will be limited to the short construction period. The solar panels can be attached to the ground and removed with minimal ground disturbance. Furthermore, following decommissioning, the site can be restored to its former condition.

5.2 Description of the proposed development

The proposed development is for the installation and operation of a ground-mounted solar farm of around 49.9MW that will generate and deliver electrical power to the local distribution

network. The proposal also includes a Battery Energy Storage System comprising 30MW housed in 38 containers.

The scheme will be operational for up to 40 years and therefore the application is for 40 years plus up to 1 additional year each for construction and decommissioning, totalling 42 years. The applicant seeks a three year period by which to commence the development i.e. start the installation works. Once decommissioned, the development will be completely removed and returned to its current use. A construction and decommissioning plan can be prepared via a planning condition, should this be required.

The following drawings have been submitted with this application:

- UKZ157_01 CCTV.
- UKZ157_02 Battery Energy Storage
- UKZ157_03 PV Panel Elevations (South Facing).
- UKZ157_04 Solar Inverter Cabin.
- UKZ157_05 Battery Inverter Cabin.
- UKZ157_06 Deer Fence Typical Arrangement.
- UKZ157_07 DNO Substation Plan and Elevation Drawing.
- UKZ157_08 Location Plan.
- UKZ157_09 Layout Plan.
- UKZ157_10 Mitigation and Enhancements Plan.
- UKZ157_11 Access Track Elevation.
- UKZ157_12 Storage Building
- UKZ157_13 Existing Site Plan
- UKZ157_14 Double Gate (access).

***Figure 6**: Solar panels are designed to allow sheep to graze around and under panels*

***Figure 7**: Use of hedging to screen a solar farm; trees will be used in the case of this site.*

5.3 Descriptions of development components

The various components of the proposed development are set out below and shown on the accompanying plans. As previously discussed, the development is of a temporary nature and the various aspects of this temporary installation are described below. Solar and battery technologies are constantly evolving and improving and so the site has been designed with representative solar panels and equipment. The final choices will be determined by availability and state-of-the-art at the time and while they will largely meet the specifications set out below and in the drawings, some minor differences may result.

5.3.1 Solar arrays

A solar farm consists of solar PV panels organised into arrays alongside ancillary infrastructure. Most of the site will remain open as grassed spacing between rows and field margins. The solar panels will be mounted on galvanised metal frames set into the ground by either direct or screw piling.

In order to achieve optimum solar gain, the panels will be laid out in east-west rows and will be fixed at an angle of inclination as depicted under Figure 2 (layout plan).

The height of the solar arrays will be approximately up to 3.5 metres from ground level to the top of the back of the panel frame. The lowest edge of the panels will be raised above ground by around 0.8 metres to allow grazing of small livestock underneath and around the frames yet the panels will be low enough to minimise visibility from surrounding areas.

Figure 8 *- solar panels mounted on galvanised metal frames set into the ground by either direct or screw piling*

Figure 9: *Typical solar panel*

Figure 10: *Typical inverter cabin*

5.3.2 Site capacity

National Policy Statement (NPS) EN-3 was published in January 2024 and confirmed that for the purposes of determining whether a solar farm should be determined within the TCPA regime, the site capacity should be calculated using the 'combined-inverters method', i.e. the total combined capacity of all the inverters within the development that serve the solar farm:

"2.10.53 From the date of designation of this NPS, for the purposes of Section 15 of the Planning Act 2008, the maximum combined capacity of the installed inverters (measured in alternating current (AC)) should be used for the purposes of determining ***solar site capacity****."* (our emphasis).

The site contains a total of 16 solar inverter cabins, which are used for converting the DC electricity produced by the solar panels into AC power for export to the grid or for charging the battery systems. The battery inverters are separate to the solar inverters and used only for transforming energy used in charging/discharging the batteries as part of the BESS scheme. Therefore, as advised by EN-3, these are not included within the solar site capacity calculation.

There are 2 different types of solar inverters of different capacities, which have an aggregate AC rating of 49.9MW. The proposed combinations of proposed inverters is shown in the table below. The final selection or combination of inverters may change, but will not exceed the site capacity of 49.9MW. As such, it is clear that the application should be determined under the TCPA regime.

Combined-Inverters Method			
	Number of Solar Inverters of Type	Capacity of Solar Inverter Type	Total Solar Inverter Capacity
Solar Inverter Cabin Type A	15	3.06 MW	45.90 MW
Solar Inverter Cabin Type B	1	4.00 MW	4.00 MW
Total solar inverter cabins	16		**49.9 MW**

As is normal for solar farm applications and noted above, the final selection of solar panel will be made post-determination. Final selection will be made on a range of factors including price, performance and availability. The site DC (panel) power, expressed as MWp, is normally greater than the 'combined-inverters method' to account for overplanting. Under the current design, the site contains a total of about 153,500 solar panels. Typically, each solar panel is rated at an individual power of between 520Wp and 600Wp. Using the mean average of these typical panel power ratings, the aggregate DC (panel) power of the site is approximately 86 MWp. This figure is subject to change with detailed design, but the layout, specifications and parameters set out in the application documents and used to assess the proposals, will not change significantly.

The area of the horizontal plane of the solar panels (i.e. the area viewed from directly above, as depicted on the layout plan), would be approximately 34 ha, compared to a planning redline of 141.78 ha, meaning a proportion of about 24% of the site is covered by panels (noting also that vegetation will also grow under the arrays). The remainder of the planning redline area is predominantly the biodiverse spaces between the panels, the set aside areas for biodiversity gain, and the relatively very small areas given to ancillary buildings and access tracks.

5.3.3 Battery energy storage

The compound will contain a 30MW battery energy storage system (BESS). Note that inverters relating to the BESS should not be counted in addition to those serving the solar element in calculations of capacity, since applications within the TCPA regime are not restricted to <50MW.

The compound comprises 38 no. containers measuring approximately 14.2m by 2.8m by 3m each (Drawing UKZ157_02 Battery Energy Storage and Figure 16 below). Each container will house battery strings, battery management system, power distribution system and auxiliary systems such as fire suppression and alarm system, power distribution, ventilation, cooling, lighting and thermal control system. The BESS will be located centrally within the site to the south east of the existing spinney.

5.3.4 Inverters

Inverters will be included to convert the direct current (DC) electricity output from the solar arrays into usable alternating current (AC) power for the electricity distribution network. These are expected to be located with the transformer in centralised inverter cabins (Figure 10 and

Drawing UKZ157_04 Solar Inverter Cabin). Colours can be agreed, if required. The inverter cabins with transformers will be located in the west and inner most eastern edge of the site.

5.3.5 Transformers

Transformers will be installed for each inverter to step up the low voltage electricity produced at the site to high voltage for efficient transportation around the site and to the grid connection point. The transformers are housed with the inverters in cabins (Figure 10 and see again Drawing UKO054_04 Inverter Cabin). Colours can be agreed, if required.

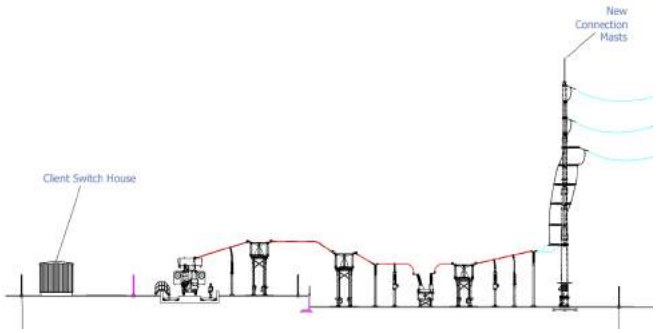


Figure 11: *Typical substation*

Figure 12: *Typical security at a solar farm*

Figure 13: *Typical fencing used around the solar farm*

Figure 14 *Typical battery energy storage container*

5.3.6 Substations and grid connection

The solar farm will contain grid switchgear equipment, one for the District Network Operator DNO (see Figure 11) and one for the operator of the facility. This equipment forms part of the electrical power system and is housed within the substation located adjacent to the majority of inverter cabins in the central eastern portion of the site with one additional inverter cabin located in the west of the site.

5.3.7 Fencing, security and screening

An approximately 2.0m high wire mesh deer fence (Figures 12 and 13 and Drawing ref UKZ157_06 Deer Fence Typical Arrangement) will be constructed around the compound with small mammal gates and vehicle entrance gates to allow vehicle and pedestrian access (not public access). This will act as the only security fencing within the site, except as required around the substation. Appropriate safety signage will be displayed on the fencing and gates.

Infra-red and/or thermal imaging CCTV cameras will be installed to the fence to provide security coverage of the site (Drawing ref UKZ157_01 CCTV). These cameras will monitor the interior of the site and gap between the perimeter hedges and fence line and will not point outside of the site including any neighbouring properties.

No external lighting will be required other than temporarily during construction. Emergency lighting will be brought to site only when required.

Screening of some of the edges of the site will be provided by managing any existing vegetation and planting new trees with shrub understory, where necessary as depicted under Drawing UKZ157_10 Mitigation and Enhancement Plan and on the site layout plan ref UKZ157_09 Layout Plan.

5.3.8 Equipment Storage

A storage building will house spare parts and maintenance equipment. This will measure approximately 2.5m by 6.5m and 2.9m high and is shown on the site layout plan ref UKZ157_09 Layout Plan and Drawing ref UKZ157_12 . Colours can be agreed, if required.

5.3.9 Existing utilities

Prior to construction, the presence of any existing utilities or underground cables will be assessed and precautions taken to protect them. Such measures may include temporary 'goal posts', physical barriers and markings on ground. On-site cabling will be ducted underground at a typical depth of around 1 metre.

5.3.10 Construction compound

A temporary construction compound may be created during the construction period to accommodate portacabin-type buildings in addition to providing an area for material storage and construction vehicles to turn around. Portacabins are required for offices, toilets, canteen and storage and will contain temporary parking spaces for staff. There will be no need to remove trees or hedgerows and the compound will be entirely removed at the end of the construction phase.

The compound does not form part of the application.

5.3.11 Construction

The total construction period will be approximately 49 weeks including any pre-preparation of the site, fencing, assembly and erection of the photovoltaic arrays, installation of the inverters/transformers and grid connection.

5.3.12 Access

Access into and out of the site will be via existing site accesses off Guanockgate Road to the west of the site. The accesses will be made suitable for HGVs using the standards specified by both SHDC and FDC.. The Transport Statement and Construction Traffic Management Plan submitted with the application demonstrates safe manoeuvrability of vehicles into and out of the site.

5.3.13 Landscaping

The application includes additional landscaping and biodiversity measures, including adding hibernacula and log piles, nest boxes and planting approximately 4.6km of native trees and shrub understory as per the Mitigations and Enhancement Plan (Drawing ref UKO054_10) based on advice from our landscape consultant and ecologist.

6.0 Statement of Community Involvement

Local and national planning guidance recognises the importance of community engagement. The applicant team has commenced early engagement to support preparation of the application.

This Statement of Community Involvement (SCI) details the public consultation the applicant has been carrying out with local residents and councillors to inform them of the proposals, in accordance with national and local policies. The applicant anticipates that a further addendum to this SCI may need to be submitted in order to evidence any further evolution of the proposals to respond to issues identified in the comments received. The applicant will endeavour to continue to keep local residents and councillors informed.

The pre-application consultation aims to do the following:

- To let local residents, businesses, councillors and other stakeholders know about the proposed development on the site.
- To understand local views, engage with the community, help identify concerns and opportunities, and feed these into the evolving proposals.
- To show how the applicant has responded to the issues of the community and stakeholders, and how changes have been made to the proposals.
- To pledge the applicant's continuing commitment to engagement throughout the statutory consultation period and beyond.

In accordance with the SCI of both SHDC and FDC, PACE has undertaken the following:

- Sought pre-application advice from LCC and CCC to address potential effects of the development on below ground archaeology and on the section of PROWs within and running adjacent to the site boundary.
- Sought pre-application advice from Historic England (HE).
- Provided an initial pre-application leaflet to parish councils, ward councillors and local residents and businesses in October 2022. This included 686 properties in the vicinity of the site.
- Created a project specific website www.tyddsolar.co.uk with an initial feedback form, which went live on 11 October 2022 and remained available until November 2023.
- Held a virtual meeting to present and discuss the proposals with Councillor Michael Seymour representing The Saints ward, which includes Sutton St Edmund, on 7 October 2022.

The project went on hold in November 2022 while further work was undertaken to address flood risk matters. Once these were resolved, the applicant commenced a second round of public consultation in November 2023, which included:

- Providing a stakeholder briefing document to parish councils and ward councillors.
- Providing an update leaflet to 926 local residents. The leaflet mailing zone was extended at the request of Sutton St Edmund Parish Council.
- Holding an in-person public exhibition on Thursday 30 November at Sutton St Edmund Village Hall.
- Providing a feedback form at the event and online.
- PACE's community relations team operate a contact centre for Tydd Solar, consisting of a dedicated Freephone number and email address throughout consultation so that members of the public and other stakeholders can get in touch, ask questions and leave comments easily. Details of these were included on the leaflet. These channels will continue to be available until after any planning decision has been made on the proposals.
- All enquiries are promptly and comprehensively responded to. All phone calls and emails are handled on a case-by-case basis, with each piece of correspondence receiving a bespoke response from the applicant, and questions and concerns being addressed in each instance.

6.1 Policy and legislation

6.1.1 SHDC

SHDC itself does not appear to have a stand-alone SCI, with the only known Statement being that adopted in December 2006. However, the South East Lincolnshire SCI, adopted in April 2012 covering both Boston Borough Council (BBC) and SHDC, sets out the way in which both BBC and SHDC will consult *"members of the public and stakeholders on the preparation of planning policies and the determination of planning applications,'' including the submission of "any preliminary consultation that they have undertaken with the community as part of their application."*

The document continues to state that *"Public involvement at this stage should ensure that such schemes are well understood by the local community and other interested parties, and allow early consideration of the fundamental issues relating to whether a particular proposal would be acceptable in principle."*

6.1.2 FDC

The Council's SCI, adopted July 2018, sets out the measures FDC has adopted to engage the local community in the planning process, as required by the Planning and Compulsory Purchase Act (2004) stating that the *"Statement of Community Involvement (SCI) sets out how Fenland District Council ('the Council') will involve and consult with the public and wider stakeholders when planning for the future of the district"*.

The SCI sets out the number of ways in which the local residents can get involved in the planning decision making process. As part of the developer pre-consultation with the

community, the SCI states that *"even if not compulsory for all other types (non-wind turbine) of development, pre-application consultation will enable communities to raise issues with and make suggestions to the developer. This might reduce local opposition, increase the chances of a timely and positive decision from the planning authority and improve the resulting quality of development."*

6.1.3 Localism Act, 2011

The community engagement work has also followed the consultation principles established within the Localism Act (Section 122) for consulting the public:

- *"The publication of the proposed application widely, to an extent that can be reasonably said to bring the proposed application to the attention of the majority of persons who live at or otherwise occupy premises near the site.*
- *"To make clear how interested persons may contact the applicant team should they wish to comment or collaborate in relation to the proposed development.*
- *"To give such information about the timetable to ensure that persons wishing to comment on the proposed development may do so in good time.*
- *"Have regard to the responses to consultation that have been made following the consultation process.*

6.1.4 National Planning Policy Framework (December 2023)

Pre-application community consultation and engagement have been undertaken in accordance with NPPF, revised Ministry of Housing, Communities and Local Government in July 2021 to address the point that:

"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community." (Paragraph 39)

6.2 Pre-application discussions

Pre-application advice was sought from both LCC and CCC in terms of below ground archaeology and on the potential impact of the scheme on the PROW network across and close to the site. Advice was also sought from Historic England.

Pre-application advice was also sought from the both counties as Local Lead Flooding Authority (LLFA) on whether or not the scheme would present significant flood risk and surface water drainage concerns.

The EIA screening process also enabled PACE to consider the feedback via consultation responses from both SHDC's and FDC's internal consultees. Some of this advice has helped shape the proposal as submitted.

6.3 Engagement with parish and ward councillors (October 2022)

In October 2022, pre-application briefings were offered to host and neighbouring ward and parish councillors, in addition to the leaders and chairs of planning of SHDC and FDC. These individuals and their position can be viewed in figure 15.

Contact	Position
Lord Porter	Leader of South Holland District Council
Cllr Sam Clark	Cllr for Roman Bank Ward
Cllr Michael Humphrey	Cllr for Roman Bank Ward
Cllr Christopher Seaton	Cllr for Roman Bank Ward
Cllr Chris Boden	Leader of Fenland Council
Cllr David Connor	Chair of Fenland Planning Committee
Cllr James Avery	Chair of South Holland Planning Committee
Cllr Michael Seymour	Cllr for The Saints
Tydd St Giles Parish Council	Clerk
Gorefield Parish Council	Clerk
Sutton St Edmund Parish Council	Clerk
Newton-in-the-Isle Parish Council	Clerk

Figure 15: *A table of political stakeholders for early engagement*

Information was sent via post and email and followed up with a phone call to host parish and district councillors. Meetings were offered to elected representatives to discuss the proposals, and approach to public consultation with the wider community. Responses were received from Cllr Seymour, Gorefield Parish Council, Sutton St Edmund Parish Council, Tydd St Giles Parish Council and Newton-in-the-Isle Parish Council.

A virtual meeting to present and discuss the proposals with Councillor Michael Seymour representing The Saints ward which includes Sutton St Edmund took place on 7th October 2022. Councillor Syemour raised no significant concerns and a copy of the presentation was sent to the councillor.

Notification of the public launch was sent to those in figure 15 ahead of the public leaflet landing.

Shortly after this the project was put on hold due to flood risk matters. Once these were fully resolved, a second round of public consultation was undertaken in November 2023. Details of this, and how parish and ward councillors were consulted are at that stage, are outlined in section 6.5 below.

6.4 Community consultation (October 2022)

This section describes how PACE has initially engaged with the local community.

6.4.1 Publicising consultation

The scheme introduction leaflet under Figure 17 was delivered to the mailing zone in Figure 16 containing 686 addresses in October 2022. .

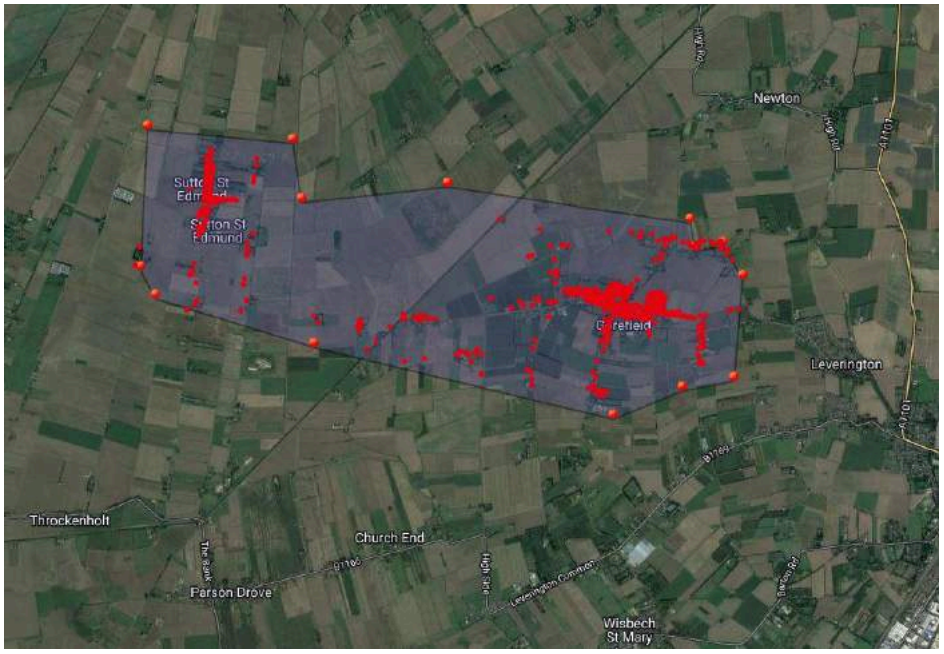


Figure 16: *the resident/community and business mailing zone (October 2022)*

Figure 17: *A screenshot of Tydd Solar introduction leaflet .*

6.4.2 Contact centre

A dedicated contact centre was set up during the pre-application phase of consultation and engagement for local communities and consultees around the site. This included an information line, which was manned during office hours and was advertised on all engagement and consultation materials, including leaflets, the website, and the stakeholder briefing pack.

The contact centre also included an email address (tyddsolar@communityrelations.co.uk) which was included on all consultation and engagement material throughout this early non-statutory period.

The pre-application feedback received through this phone line and email address contributed to the refinement of proposals.

6.4.3 Consultation website

A project specific website was developed and went live in October 2022, which included details of the site, proposed development, and a feedback form. This can be viewed at www.tyddsolar.co.uk and in the screenshot under Figure 18 overleaf.

To ensure that this information was as widely available to the public as possible, PACE supplemented this with the following:

- In October 2022, a leaflet with basic information, a link to the website and ways to contact the team was delivered to residential and business properties in the vicinity of the site, covering an area of 3.7 km2 and including 686 addresses. A copy of the leaflet is included under Appendix 2.

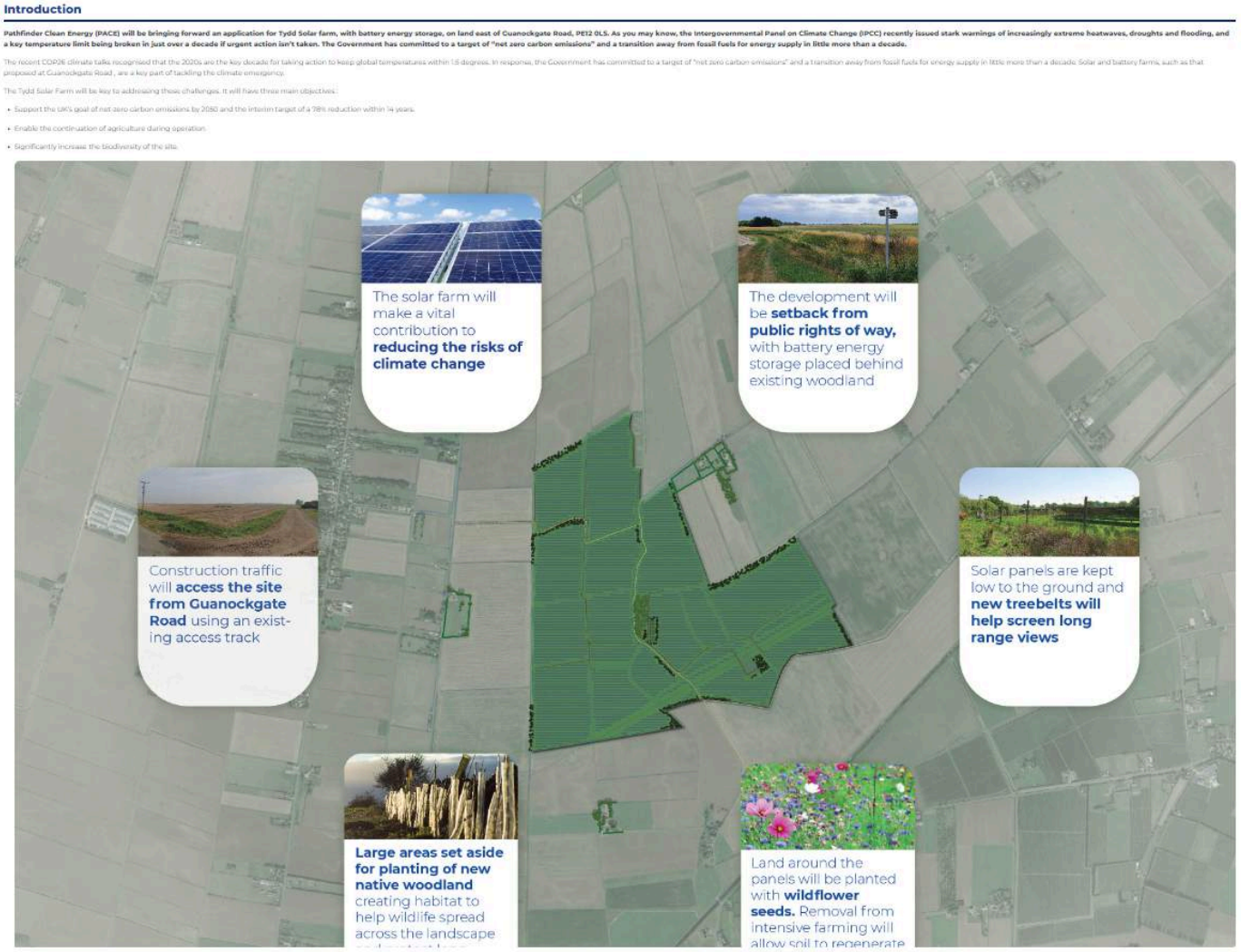


Figure 18: *A screenshot of the community consultation website during consultation period.*

6.4.4 Feedback survey (October 2022)

In October 2022 a feedback survey was available on the website, which provided an opportunity for the public to comment on the scheme and comprised the following set of questions:

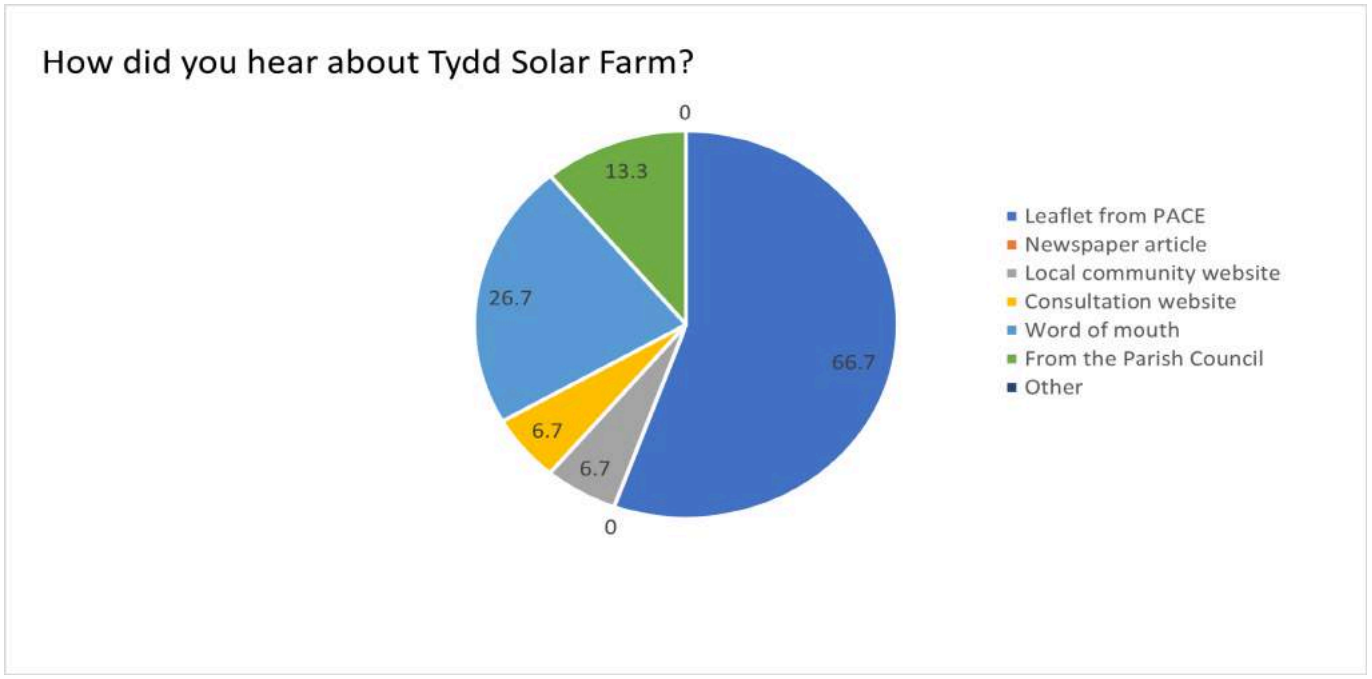
- *How would you describe yourself?*
- *How did you hear about Tydd Solar?*
- *Which of the following developments would you welcome in your local area to produce energy for local and national need?*
    - *Solar farm*
    - *Other renewable power generation (e.g. wind farm, biomass incinerator, anaerobic digester)*
    - *Fossil fuelled generation (e.g. coal fired power station)*
    - *Nuclear power plant*

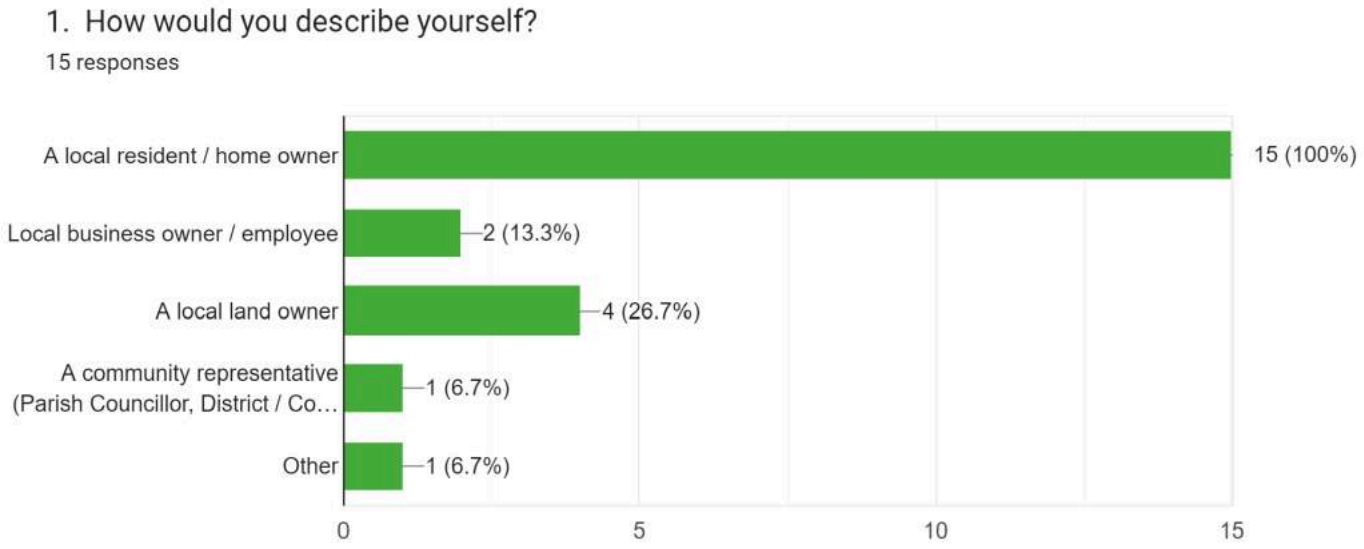
    - *Energy from waste plant*
    - *Don't know*
    - *Nothing*
    - *Other*
- *How supportive are you of solar farms as a means to generate affordable, low carbon energy?*
- *How supportive are you of the current proposals for Tydd solar?*
- *What could we do to improve our proposals?*
- *Please provide any further details on how we could improve our proposals.*
- *Which of the following benefits of the scheme do you consider to be most important, or would like to see more of?*
- *Please provide any further details on scheme benefits.*
- *So that we can better understand where feedback has come from, please let us know your postcode below:*
- *Please provide your email so that we can contact you with updates about Tydd Solar:*

6.4.5 Consultation feedback (October 2022)

Quantitative feedback

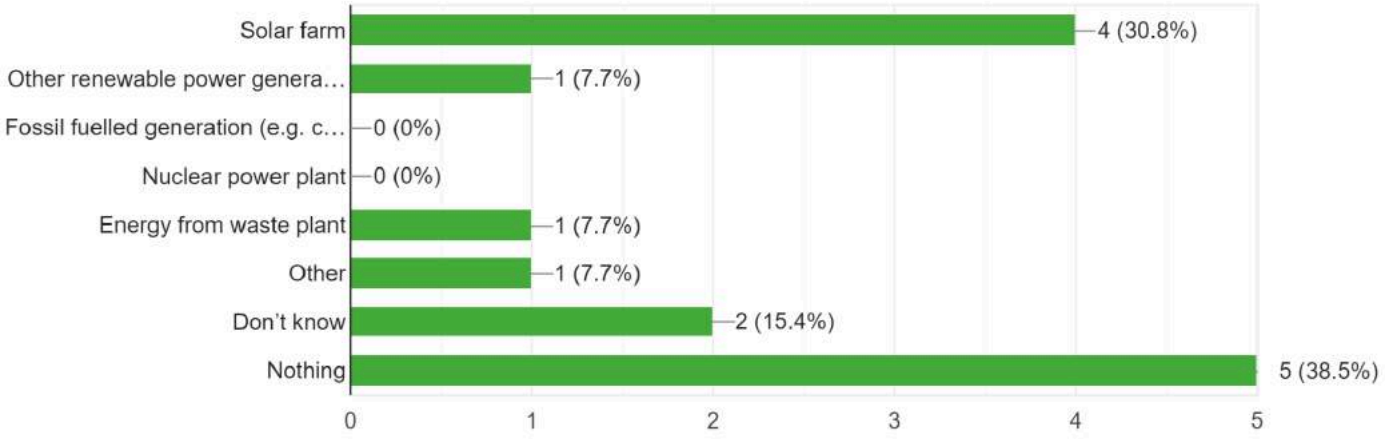
Data was collected from the response to the initial questions on the website. The following charts are taken from the survey.


How did you hear about Tydd Solar Farm?
0
13.3
26.7
66.7
6.7
6.7
0
Leaflet from PACE
Newspaper article
Local community website
Consultation website
Word of mouth
From the Parish Council
Other


1. How would you describe yourself?
15 responses
A local resident / home owner
15 (100%)
Local business owner / employee
2 (13.3%)
A local land owner
4 (26.7%)
A community representative (Parish Councillor, District / Co…
1 (6.7%)
Other
1 (6.7%)
0
5
10
15

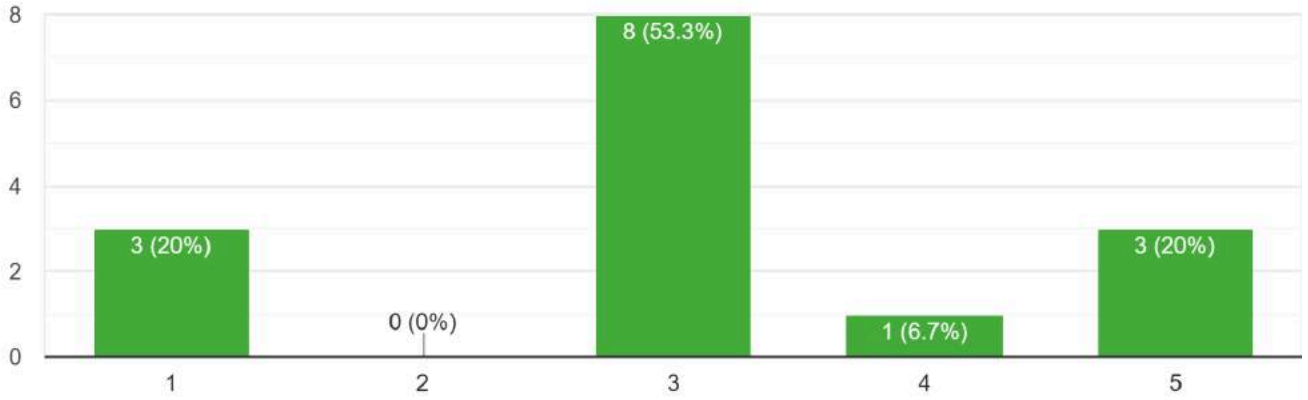
2. Which of the following developments would you welcome in your local area to produce energy for local and national need?

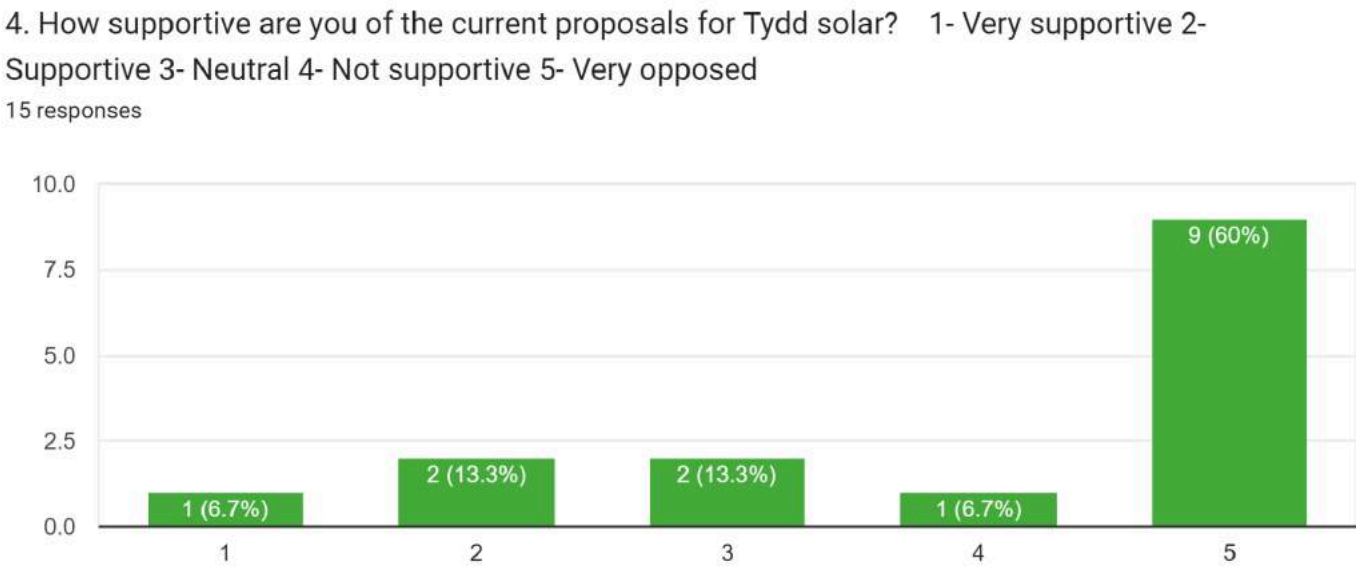
13 responses



3. How supportive are you of solar farms as a means to generate affordable, low carbon energy? 1- Very supportive 2- Supportive 3- Neutral 4- Not supportive 5- Very opposed

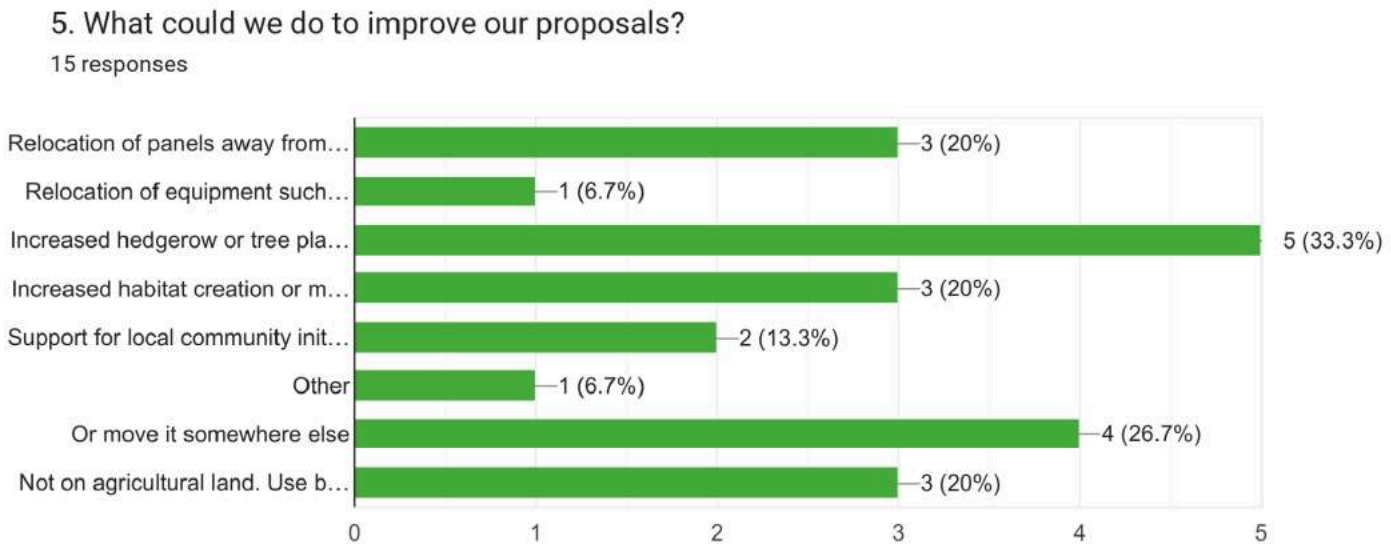
15 responses



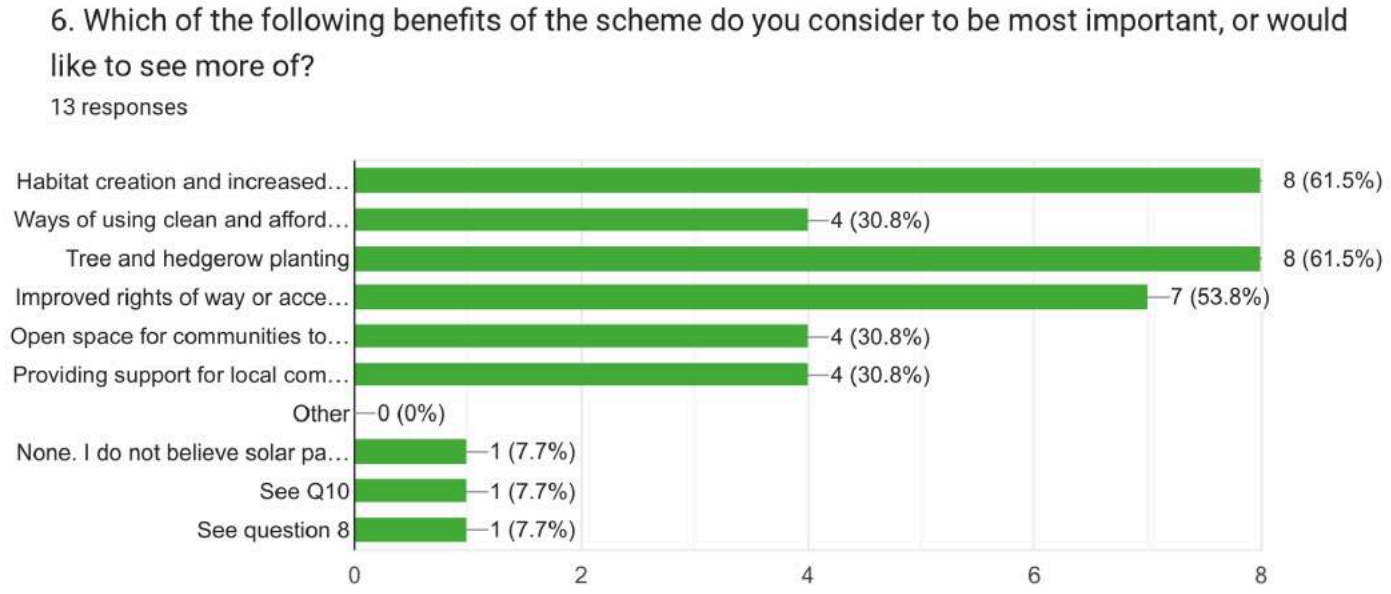


The chart for Q3 above shows that nine people were supportive/neutral about solar farms as a means of generating affordable, low carbon energy. However, the chart for Q4 illustrates that on a scale of 1-10, with 10 being the most in support, 3 people were in support of the development, 2 were neutral and 10 were opposed to it.

The reasons given are explored in the consultee comments table in section 6.5.4.2 along with PACE's responses.



PACE increased the provision of planting and habitat creation following the October 2022 survey.

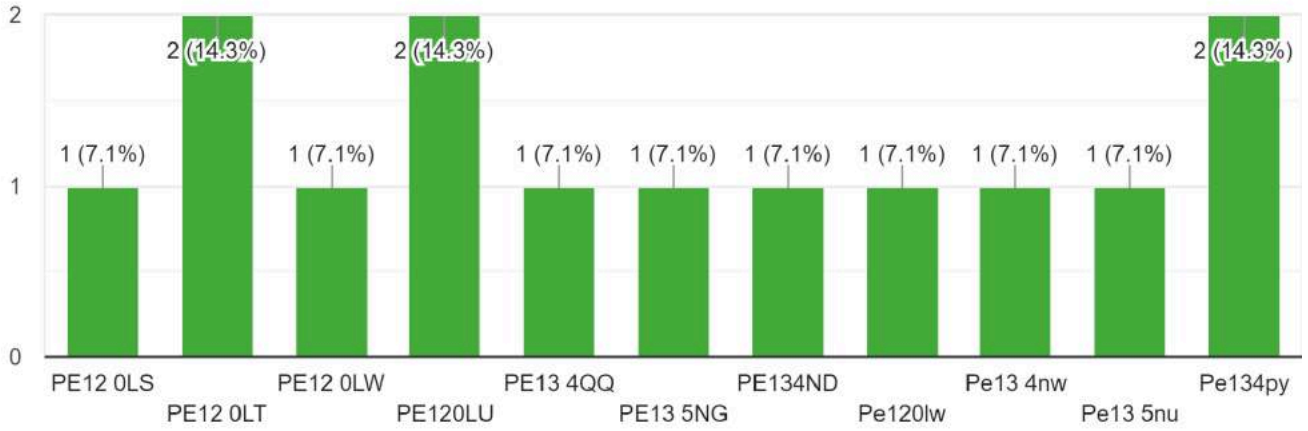


The chart above reveals that 'Habitat creation and increased measures to encourage wildlife' and 'Tree and hedgerow planting' are the most important features of the proposal, followed by 'Improved rights of way or access for pedestrians, cyclists and horse riders'. '

Ways of using clean and affordable energy in the community (eg electric vehicle charging points', 'Open space for communities to use' and 'Providing support for local community groups or initiatives' were joint fourth.

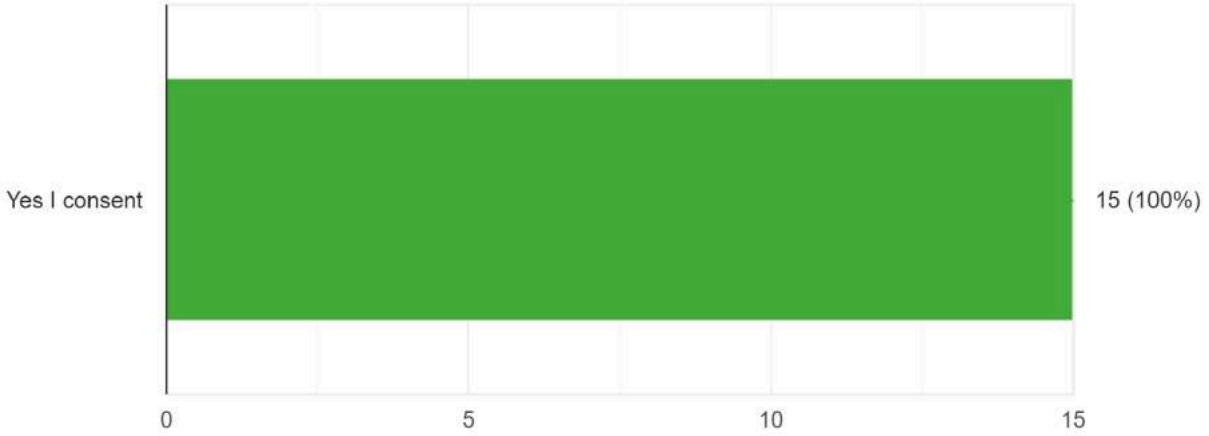
7. So that we can better understand where feedback has come from, please let us know your postcode below:

14 responses



Please tick this box to consent for your information to be stored so that we can contact you and your responses can be used for us to analyse. Our ...ote we will not share any of your personal details.

15 responses



6.4.5.2 Qualitative feedback and the applicant's response

Scheme Benefits - Comments	Applicant's responses
I don't want to see solar panels from my bedroom window. You should offer to buy out properties in plain sight of this proposed monstrosity. Compensation should be given to Any loss of value of properties or if this results in more difficulty in selling properties in direct sight of this site.	There is no evidence to show that solar farms near to properties (although not affecting them through an visual impact) would cause a reduction in value to these properties. Notwithstanding this, property value is not considered a material matter in planning terms.
If a scheme could be resited further towards Gorefield and away from the public access routes another initiative, could be PACE linking with a solar panel supplier to offer solar panels on domestic roof properties within Sutton St Edmund so that villagers could use economies of scale with a subsidised initiative from PACE similar to a planning gain/condition offering green energy for households who may wish to collectively join up to a scheme like this for domestic energy returns.	The scheme has been kept away from the public rights of way. Diagrams of this have been included in the Transport Statement submitted with the application and also on the Mitigation and Enhancements Plan (UKZ157_10). PACE is open to discussing community benefits with the local parishes.
With more and more land being put over to either biofuel crops and wind and solar farms. It would be nice to see more habitats created for native fenland species, not hedgerows and trees. More open grasslands, marsh and wetlands	There would be a considerable biodiversity net gain including the regeneration of the copse in the middle of the site (not in the redline but will benefit from being surrounded by fencing to keep deer out). The reed beds across the site would be improved and provision has been made for the creation of new areas for biodiversity enhancement.
To leave the ground as agricultural soil and grow crops that people can use for food production.	The area would be left fallow for a period of 40 years. This would allow the soil quality to regenerate and improve so that growing crops in the future on this land would be of better quality with better soil quality. The area can still be used for agriculture through the grazing of sheep beneath and around the panels.
Since you have not provided a space for comment, here goes. I believe that some of Guanockgate Rd is in very poor repair - very uneven. Construction traffic will make it worse so, do you have a plan to repair the road, afterwards?	PACE is committed to ensuring that the scheme does not worsen the state of the roads and would work with the local highways authority including offering improvements where these are feasible.

Free electricity for those who have to look at solar panels for 40 years! I may have completed this form previously!	The electricity generated would be fed back into the grid. The more solar power that is generated the overall cheaper it will be for everyone in the long term.
Sustainable agriculture already provides all of the ecological benefits without the solar panels.	In addition to the ecological benefits of increasing the biodiversity net gain across the site, the provision of solar allows the farmer to receive a consistent additional income so that the farming business can be better run for the future.

Improvement Ideas - comments	**Applicant's response**
I use the farm track at the end of Cross Road on a regular basis for walking my dogs. Does this mean that I will lose access to this track?	There would be some disruption to the use of this track during construction but there would be no access issues once the solar farm is operational.
I don't want to see solar panels from my bedroom window	The scheme has been designed so that visibility of panels is minimised from principal areas of the house i.e. the ground floor.
This is directly planned within public footpaths used regularly by villagers, dog owners and the horsing community. The public bridleways are also engulfed by this development and the effect this will have on the free roaming deer and muntjacs which herd across these fields will be devastating. PACE clearly has no understanding of these issues or interests of the local village community when siting this solar park in this area and close proximity to Sutton St Edmund.	The scheme has been designed to carefully consider the impact of the proposals on the local community. suitable mitigation has been proposed in the form of trees with shrub understory and public rights of way would not be affected once the site is operational.
This area of the Fens is unique in the fact there is so little development, which is rare nowadays. The fens by their very nature are large open spaces planting of hedges and trees for screening of what is in effect ugly structures will change to landscape of openness to obstruction especially as there a number of public rights of way going through the site. I note your plans to support nature but does this include wildlife more suited to open fields like hares, sky larks and various other ground nesting birds and also the birds	PACE has carried out ecological surveys to not only understand the current baseline ecology situation but to also enhance the current situation. The Biodiversity Net Gain (BNG) Assessment confirms that the net gain in habitat units equates to around 173%.

of prey that roam the open areas in search of vole's and other rodents.	
I have seen other solar panel field systems locally (they clearly are not farms) and note hedging and screenings is not that effective even after several years and on the home the security fencing and cameras make the site feel like a prison, I can see walking along the bridleways between this fencing is going to detract significantly from what is at this time a specially this time of year an invigorating walk.	The proposals incorporate trees with shrub understory as part of the screening mitigation for the site. This planting, when mature, would effectively screen the site so as not to result in any significant visual impact. The site would maintain an open feel as much as possible with the associated equipment such as CCTV cameras blending into the surrounding as much as possible.
Do NOT cover agricultural land with solar panels - we need soil to grow food in this country. There are plenty of buildings or brown sites that could have solar panels to generate renewable energy. Place them in cities where energy is being consumed, and where crops can't be grown. Without agricultural land to produce food for this country imported foods will be required, increasing the UK's carbon footprint. Grade 2 soil where this site is proposed is not in line with guidance and should be retained for crops that help our food production carbon footprint kept low.	In order to achieve the UK's net zero goal, solar panels are needed across both brownfield and greenfield sites. Large quantities of solar are needed across the country with each solar farm making a contribution. Information submitted as part of the application demonstrates that a site search process found this particular site to be the most suitable when assessed against a criteria of factors. The use of higher grade land was found necessary and this is something that is abundant in this part of the country. Notwithstanding this, the site would be returned back to its current state after the temporary use as solar has ceased thereby enabling arable production once again.
In the first place the land you show is not in Gorefield, I believe it is Sutton st Edmund with some in Tydd st Giles? However as it is very close to the village of Gorefield, I would be interested in knowing how you would support local initiatives. My other concern is the road system you are considering using. It is in a very bad condition at the present, you are considering going across Clough Cross Bridge which is a listed structure made of brick and should avoid being crossed by heavy traffic. The road surfaces especially down Guanockgate Road are very very poor and could not take any heavy traffic. The other item that concerns me is the course of Lady Nunn's Eau which is an ancient watercourse, part of the Shire Drain which forms the county boundary between Lincolnshire and	PACE is open to supporting local initiatives as set out in the Community Charter, a copy of which can be circulated upon request. It is appreciated that parts of the road network are in a poor state but a transport assessment covering the site did not suggest that the road conditions were so bad as to warrant them not being used for vehicular access. The listed bridge already has farm machinery and HGVs going over this. PACE fully expects a condition as part of the approval of the application to provide further details such matters including construction management.

Cambridgeshire. How do you propose ensuring that this ancient feature is not affected but could perhaps be enhanced? Also the line of Elloe Bank runs through your proposed scheme I believe. What measures do you intend to take to not affect this ancient feature?	
Vastly increase planting of trees and shrubs using only native species sourced locally (existing copses and plants are often exotic taxa); create corridors of hedges etc. throughout; ensure that "wildflower seeds" used are only sourced from local area so that exotic species are not introduced; create extra walking / cycling / riding paths with easy access from local communities (proposal appears to restrict use of existing pathways that while not public rights of way are currently available for use); create ponds and irregular water features for use of wild birds etc.	PACE is committed to enhancing the biodiversity credentials of the site from that of the existing situation. The BNGA shows around a 173% increase in habitat units. Planning policy requires a minimum 10% increase in BNG. In this regard the proposals far exceed the policy expectation/requirement. None of the PROW would be restricted during operation of the solar farm and efforts have been made to enhance existing features such as reed beds and protect the copse in the middle of the site from deer damage through the addition of fencing.
I'm not 100% clear what screening you currently propose, but screening is important.	Screening will be in the form of trees with shrub understory as this is a feature more readily found within the surrounding area. The location and extent of this screening can be found on the drawing ref UKZ157_10 Mitigation and Enhancement Plan..
I will have a clear view of the vast solar farm in all its glory especially from my upstairs rooms. Not good! You will need to liaise with me regarding resolving my obvious objection to this proposal.	PACE is happy to discuss any aspect of the proposal with neighbours and residents during the application assessment process.
Move it away from my property, just one field away is too close. The construction traffic will have to use Guanockgate Road which is not up to supporting the amount of heavy traffic, evident by the collapse of the underlying construction, which is ongoing with local council and is still to be resolved. Until we know what support for the local community is proposed it is difficult to comment on. One way to improve your proposal would be an electrical supply subsidy for affected households, no more so than ours.	The proposal is a sufficient distance to neighbouring properties and the impact on the nearest properties has been thoroughly assessed. A Transport Statement and Construction Transport Management Plan (TS&CTMP) has been provided to detail the construction traffic route and management of any potential impacts. Whilst the electricity generated will be fed back into the grid. PACE are open to discussions with the local parishes over how they can directly support the local community.
I am very concerned about the traffic coming	Traffic will be carefully managed and this is

down Guanockgate Road. The roads are so bad now. Also what happens to all the deer down the Fen. Also I know we need electric but we also need food. Prime agricultural land wasted...	set out in the Transport Statement submitted with the application. This will be followed up with an assessment from transport consultancy, Apex. The use of the fields for solar will not harm the quantity and quality of the country's agricultural produce.
Put solar panels on new builds not on land producing food	As above, brownfield sites in addition to greenfield sites are required to house solar development to meet the UK's urgent need for clean, cheap and reliable renewable energy.
Go away and find a brown field site or residential buildings.	As above, brownfield sites in addition to greenfield sites are required to house solar development to meet the UK's urgent need for clean, cheap and reliable renewable energy.

The following table presents the comments raised by consultees and the themes raised in the further comments question in the survey, along with PACE's response to these. This table also captures any further queries sent by members of the public directly to PACE following the consultation event.

Consultee comment/concerns	**Applicant's response**
How would the electricity generated by fed into the national grid? You show no existing pylons etc on your maps.	An existing grid connection is available via 11kV pole that runs through the centre of the site
To use brownfield sites or buildings instead of good agricultural land	Solar farms cannot be sited in all locations and suitable locations must meet certain technical and commercial criteria. An electricity substation with capacity to connect new power generation is the key locational requirement and the scheme is accompanied by a detailed Site Search document which addresses the brownfield land matter and the agricultural grading of the land matter demonstrating that the scheme is justified in this regard and utilises the lower quality agricultural land available.
Access and traffic concerns	A construction traffic management plan has been prepared to demonstrate how access and traffic have been carefully assessed as part of the scheme evolution and any conditions

	required by the Local Highway Authority would be met to ensure all access and traffic matters are carefully considered and potential harm mitigated to appropriate levels.

6.5 Consultation (November 2023)

As outlined above, the application was put on hold in November 2022 due to flood risk matters. Once these were fully resolved a period of time (a year) had passed since the initial consultation, so a second consultation was held in November 2023.

6.5.1 Publicising consultation

A leaflet advertising a public exhibition was issued to residents and businesses in early November 2023 as per Figure 19. A stakeholder pack as per Figure 20 - with more information about PACE, the project including the MEP, photomontages and Frequently asked questions (FAQs) - was circulated to the key stakeholders, including parish councils and ward members, in November 2023 ahead of the public consultation event in Sutton St Edmund at the end of November 2023.

The leaflet was delivered to 926 properties in response to a request from Sutton St Edmunds Parish Council to include the entire parish; the November 2023 mailing zone can be seen in Figure 21.


Public exhibition for proposed Tydd Solar to secure clean energy
November 2023
PACE
PATHFINDER CLEAN ENERGY

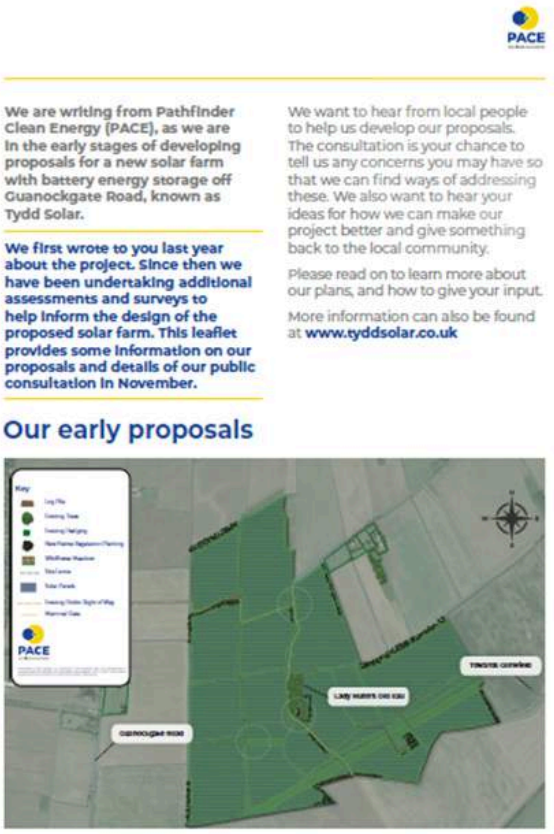

PACE
We are writing from Pathfinder Clean Energy (PACE), as we are in the early stages of developing proposals for a new solar farm with battery energy storage off Guanockgate Road, known as Tydd Solar.
We first wrote to you last year about the project. Since then we have been undertaking additional assessments and surveys to help inform the design of the proposed solar farm. This leaflet provides some information on our proposals and details of our public consultation in November.
We want to hear from local people to help us develop our proposals. The consultation is your chance to tell us any concerns you may have so that we can find ways of addressing these. We also want to hear your ideas for how we can make our project better and give something back to the local community.
Please read on to learn more about our plans, and how to give your input.
More information can also be found at www.tyddsolar.co.uk
Our early proposals
PACE

Figure 19: *A screenshot of Tydd Solar public exhibition leaflet .*

2

Tydd Solar

At Pathfinder Clean Energy, we are developing plans for a new solar farm to the east of Guanockgate Road, known as Tydd Solar.

We first wrote to you last year about the project. Since then we have been undertaking additional assessments and surveys to help inform the design of the proposed solar farm. This booklet provides some information on our proposals and details of our public consultation in November.

The project has the potential to play a crucial role in supplying affordable energy for homes and businesses in Cambridgeshire, Lincolnshire and beyond. At a time of energy insecurity, solar projects such as this will help reduce the need for increasingly expensive gas and reduce reliance on imported fossil fuels.

It will support the transition to a clean, sustainable, low carbon future, providing enough to power 22,388 homes each year. It will help to displace 16,080 tonnes of CO^2 per year - equivalent to removing the emissions from 13,110 family cars.

The site has been carefully selected. We considered a wide range of options across the region, but this site was chosen because it can be easily connected to the electricity grid, the site is outside the Green Belt and Areas of Outstanding Natural Beauty, and it would not affect any ancient woodland or protected species.

We have a long term vision for Tydd Solar, which will not only help Fenland District Council and South Holland District Council who are supporting climate change initiatives, but will also significantly enhance local wildlife, retain agricultural land use and support farmers to earn a viable livelihood.

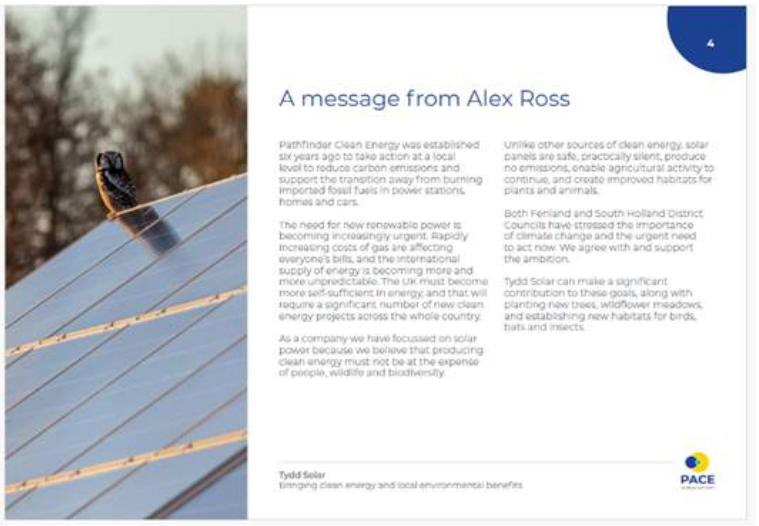
We are determined to be a good neighbour and want to discuss ways we can enhance benefits for local communities, in addition to delivering on-site environmental improvements.

A public exhibition is being held on Thursday 30 November 2023 at Sutton St Edmund Village Hall, 273 Broadgate, Sutton St Edmund, PE12 0LR from 3pm - 7pm.

At the exhibition people will be able to view our proposals, speak to members of the project team and provide feedback.

Tydd Solar
Bringing clean energy and local environmental benefits

PACE


4
A message from Alex Ross
Pathfinder Clean Energy was established six years ago to take action at a local level to reduce carbon emissions and support the transition away from burning imported fossil fuels in power stations, homes and cars.
The need for new renewable power is becoming increasingly urgent. Rapidly increasing costs of gas are affecting everyone's bills, and the international supply of energy is becoming more and more unpredictable. The UK must become more self-sufficient in energy, and that will require a significant number of new clean energy projects across the whole country.
As a company we have focussed on solar power because we believe that producing clean energy must not be at the expense of people, wildlife and biodiversity.
Unlike other sources of clean energy, solar panels are safe, practically silent, produce no emissions, enable agricultural activity to continue, and create improved habitats for plants and animals.
Both Fenland and South Holland District Councils have stressed the importance of climate change and the urgent need to act now. We agree with and support the ambition.
Tydd Solar can make a significant contribution to these goals, along with planting new trees, wildflower meadows, and establishing new habitats for birds, bats and insects.
Tydd Solar
Bringing clean energy and local environmental benefits
PACE


6
Generating environmental benefits alongside clean energy
Generating energy to power 22,388 homes every year
Displaces 16,180 tonnes of CO² which would be added to the atmosphere every year, equivalent to removing the emissions from 13,110 family cars
Significant increase in overall biodiversity on the site
Planting 4.4 hectares of new woodland
No loss of agricultural land, and the site will be fully restored after solar panels are removed
Improving soil quality in overworked fields
Reducing soil erosion through addition of grasslands
Helping farmers to diversify their income and ensure continued viability of the farm
Tydd Solar
Bringing clean energy and local environmental benefits
PACE


UKZ157_10 Mitigation and Enhancements Plan
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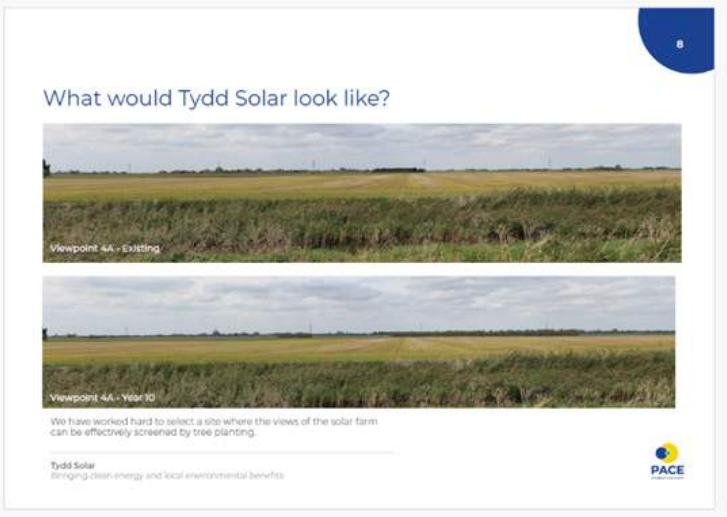
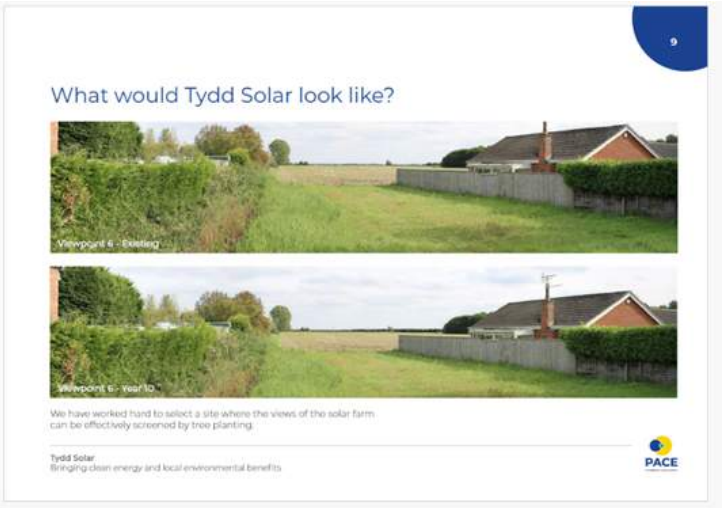

8
What would Tydd Solar look like?
Viewpoint 4A - Existing
Viewpoint 4A - Year 10
We have worked hard to select a site where the views of the solar farm can be effectively screened by tree planting.
Tydd Solar
Bringing clean energy and local environmental benefits
PACE


9
What would Tydd Solar look like?
Viewpoint 6 - Existing
Viewpoint 6 - Year 10
We have worked hard to select a site where the views of the solar farm can be effectively screened by tree planting.
Tydd Solar
Bringing clean energy and local environmental benefits
PACE


10
Frequently asked questions
From our local consultation and engagement a number of questions have been raised. We have tried to answer them here:
Are solar projects necessary?
Yes, to meet local and national net zero targets we need to move away from imported fossil fuels which are increasingly expensive and unpredictable, as well as being damaging for both the environment and human health.
Solar balances wind power, helping to provide a consistent supply of energy when the wind doesn't blow. Solar energy can be delivered far quicker than other forms of renewables, such as offshore wind, helping to achieve Fenland and South Holland District Council's objective of taking action against climate change, by, and meeting growing demand for electricity to power things like electric cars.
Couldn't we just develop rooftop solar or brownfield sites?
No, to meet the transition away from fossil fuels we need both. We need projects like Tydd Solar, as rooftop and brownfield solar schemes alone will not produce enough energy. Relying solely on small scale solar schemes would have a significant impact on energy bills.
Can't you use another form of energy generation?
Other forms of energy generation are available, but all of these would cause more environmental damage locally, and on a permanent basis. Solar projects are temporary, and deliver substantial local environmental biodiversity improvements with lots of new habitats created including wildflower meadows, hedgerows, bird, bat and insect nests.
Is Tydd Solar the right site?
Yes, this is a really well suited site for solar. We looked at a wide range of options across the local region, and this was the best option our specialist team could identify. It is close to a connection to the electricity grid and sits outside of the Greenbelt and areas of outstanding natural beauty.
Crucially any environmental impacts can be managed on the site, without impacting on any protected species or ancient woodlands. In fact the site offers us an opportunity to significantly increase biodiversity, planting large numbers of new trees and meadows, while allowing ongoing agricultural use of the land.
Tydd Solar
Bringing clean energy and local environmental benefits
PACE

11

Will you listen to local people?
Yes. We have a dedicated consultation website and are holding a public exhibition in November.

Will the solar farm be a large scale industrial complex?
No, we are doing everything we can to ensure the solar farm is sympathetic to the local environment. This includes careful mature planting and habitat creation, sympathetic low impact fencing.

The solar panels will be under three meters tall and will not include tall lighting columns. The solar farm will also connect to the electricity grid via underground cables, meaning overhead cables will not be required. Once operational, there will be little to no traffic visiting the site.

Will the solar farm have a lasting negative impact on local farmland?
No, the project has a lifespan of 40 years, after which the land can be returned to full farming use. During operation, the field will remain available for animal grazing and still be in agricultural use.

Our plans would also significantly increase biodiversity, providing a local environmental benefit whilst also generating renewable energy.

Will the solar farm have a serious impact on local heritage and archaeology?
No, we have commissioned a thorough heritage assessment and archaeological investigation of the site and have worked extensively with heritage and archaeology stakeholders to help reduce any impacts arising from the proposal.

Will you disappear once the farm is built?
We intend to be a good neighbor. We will hold a long term interest in Tydd Solar over its 40 year lifespan. As such, we are actively building relationships with the local community and stakeholders. We intend to continue talking to local people and are actively discussing ways that we can enhance benefits for local communities, as well as the environment, over the lifetime of the project.

Tydd Solar
Bringing clean energy and local environmental benefits

PACE

Figure 20: *Extracts from the stakeholder briefing pack.*

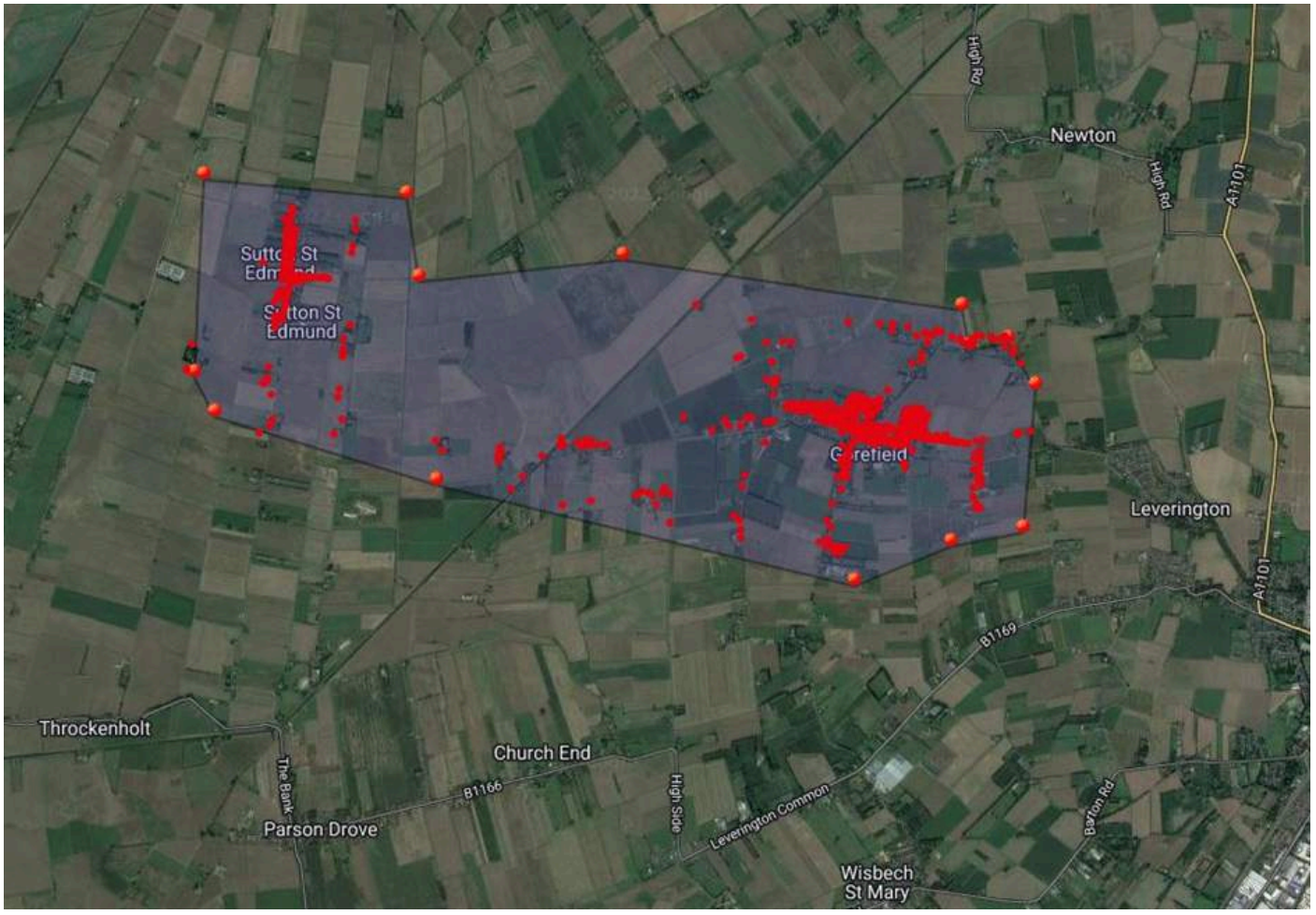


Figure 21: *the resident/community and business mailing zone (Nov 23)*

6.5.2 Consultation website

The website was updated in November 2023 to publicise the second consultation and in-person event, and included a feedback form (see section 6.5.3).

The online consultation period will run until the 11th December 2023.

6.5.3 Feedback form

A feedback form was available at the in-person public exhibition and online, and comprised the following set of questions:

- How would you describe yourself?
- How did you hear about Tydd Solar?
- How supportive are you of solar farms as a means to generate affordable, low carbon energy?
- How supportive are you of the current proposals for Tydd Solar?
- Do you have any comments on our proposals?
- Do you have any comments on our mitigation and biodiversity plans?
- Do you have any suggestions for our Community Benefit Fund?

The applicant anticipates that a further addendum to this SCI will need to be submitted in order to evidence any further evolution of the proposals to respond to issues identified in the comments received. The applicant will endeavour to continue to keep local residents and councillors informed.

6.5.4 Consultation events

A public consultation event took place on 30th November at Sutton St Edmund.

55 people attended the event, photos of which are shown in Figure 22.

Figure 22: *the public consultation event held on 30 November 2023.*

The main comments received at the public event were:

- Loss of agricultural land
- Cumulative impact
- Community benefit fund
- Construction traffic impact on Guanockgate
- Access to public rights of way (PRoW)
- Impact on horses
- Impact of fencing on wildlife
- Light pollution and security
- Impact on house prices

Feedback and the changes to the scheme based on the public consultation event will be detailed in the form of an addendum to this SCI in due course.

Notification of the application submission will be sent by email to the local parishes once the application has been submitted.

6.6 Outcomes

All comments have and will continue to be considered. It is noted that where comments and observations provided by the local community do not impact on the layout, the design evolution of the scheme is largely influenced by the appointed specialists and taken on board the conclusions of the completed surveys.

7.0 Planning policy context

This section identifies relevant national and development plan policy. The proposed development is assessed against these policies in the subsequent sections.

7.1 Statutory development plan

Section 38 (6) of the Planning and Compulsory Purchase Act 2004, states that:

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the development plan unless material considerations indicate otherwise."

The development plan for South Holland District Council (SHDC) comprises the South East Lincolnshire (SEL) Local Plan (adopted March 2019) and the development plan for Fenland District Council (FDC) comprises the Fenland Local Plan (adopted May 2014). However, Fenland District Council is currently preparing a new Local Plan which is currently at an early stage of preparation (Reg 18) and therefore carries limited weight at this time..

7.1.1 Local Plan Policies

Relevant Local Plan policies for both South Holland District Council and Fenland District Council have been considered.

SHDC

The proposal is for renewable energy development and therefore Policy 31 (Climate Change and Renewable and Low Carbon Energy) is one of the most pertinent policies to consider. This together with Policy 2 (Development Management) of the SEL Local Plan are key policies which are detailed below:

- Policy 31 (Climate Change and Renewable and Low Carbon) – The policy is split into 2 parts; climate change and renewable energy.
    - In regards to climate change, the policy requires *"All development… to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated…"* and sets out a criteria to help achieve this of which *"high-quality design"* and *"the adoption of the sequential approach and Exception Test to flood-risk and the incorporation of flood-mitigation measures in design and construction to reduce the effects of flooding"* are key.

- With the exception of wind energy, the policy supports development for renewable energy, subject to meeting 7 criteria comprising no significant harm to *"visual amenity, landscape character and quality", "residential amenity", "agricultural land take", "highway safety (including public rights of way)", "heritage assets including their settings", "aviation and radar safety"* and *"the natural environment."* How these topic areas link to this application is explained in the paragraph below.

- Landscape, visual impacts and quality are covered by the submitted LVIA, residential amenity, glint & glare including impact on aviation receptors and environmental factors by the Glint and Glare Assessment. The impact on heritage assets and archaeology is covered by the heritage and archaeology impact assessment, separation distances and safety has been considered through site layout and design evolution. Agricultural land grade is covered through the separate Site Search document submitted as part of the application and the submitted Agricultural Land Classification survey. Natural environment impacts have been considered through the EcIA, PEA and supporting BNGA and MEP submitted with the application.

- Communications have taken place with local parishes,, cumulative impacts are considered throughout the report and the proposed tree belts around edges of the site provide local distinctiveness. Decommissioning and reinstatement are part of the policy that the applicant adheres to after the 40 years of operation, requiring one additional year for decommissioning finally, and use of higher grade land has been avoided.

- Policy 2 (Development Management) - this policy sets out a list of 9 criteria that should be met, for development to be acceptable. The majority of the criteria listed is similar to that under Policy 31 and the above demonstrates how this has been covered in our assessment of the scheme. An additional requirement of this policy and which is relevant to the proposal is the need for schemes to ensure *"quality of design and orientation"*, sustainable drainage and flood risk measures and *"enhancement for areas of natural beauty."*

    - The proposed solar panel orientation and angle have been designed so that they maximise harvesting sunlight whilst ensuring that there is minimal glint and glare impact. The addition of tree belts , a feature not out of character with the surrounding area, will help enhance the natural beauty of the surrounding area. Finally, the flood risk approach set out under section 9.6 will help to mitigate against the impact of the development on flooding across the site and surrounding area.

- The other policies pertinent to this application are:

- Policy 3 (Design of New Development) – The policy states that *"Design which is inappropriate to the local area, or which fails to maximise opportunities for improving the character and quality of an area, will not be acceptable"*

- Policy 4 (Approach to Flood Risk) - The policy requires that *"Development proposed within an area at higher risk of flooding…will be permitted where It can be demonstrated that there are no other sites available at a lower risk of flooding (i.e. that the sequential test is passed)."*

- Policy 28 (The Natural Environment) - Of relevance to the proposed development is that the policy requires *"that all development proposals" provide an overall net gain in biodiversity."*

- Policy 29 (The Historic Environment) - Of relevance to the proposed development is that the policy requires the preservation and where appropriate, the enhancement of the *"historic, archaeological and drainage landscape of the Fens"* The policy requires developers to take *"every reasonable step"* to protect and, where possible, enhance the significance of archaeological remains whether known or unknown.

- Policy 30 (Pollution) – SHDC will refuse development proposals where these lead to *"unacceptable adverse impacts"* across a range of criteria. Of relevance to the proposal are the impact on amenities, noise, the natural, historic and built environment, land quality and surface and groundwater quality.

FDC

In the current Local Plan, Policy LP14 (Responding to Climate Change and Managing the Risk of Flooding) is one of the most pertinent FDC policies to consider. This, together with Policy LP1 (A Presumption in Favour of Sustainable Development) and Policy LP16 (Delivering and Protecting High Quality Environments Across the District) are key policies which are detailed below:

- Policy LP14 – The policy is split into 2 parts; Part A focusing on resource use, renewable energy and allowable solutions and Part B focusing on flood risk and drainage.

  Part A

  - In terms of resource use, the policy identifies an "urgent" need to tackle climate change. Whilst the policy supports renewable energy schemes *"in the context of sustainable development and climate change"* such proposals will need to take into account a list of 6 criteria. The way in which these link to this application is explained in the paragraph below.

  - Landscape, townscape and visual impacts and quality are covered by the LVA section 9.3 and residential and visual amenity is covered under section 9.7 . Noise impact is covered under the amenity section of this statement at section 9.5 and

highway safety matters are considered under section 9.5 and in the Transport Statement and CTMP accompanying this application. The BNGA, EcIA and MEP demonstrate the biodiversity considerations and enhancements along with the commentary under section 8 of this Statement. The impact of the scheme on aircraft movements has been considered as part of the G&G Assessment and the quality of the land has been assessed through an ALC survey supported by commentary in the separate Site Search document.

- Matters relating to Allowable Solutions do not apply to the proposal.

Part B

- Development proposals are required to take into consideration a full suite of sequential and strategic flood risk assessments with schemes required to adopt *"a sequential approach to flood risk from all forms of development."* Proposals should also have *"regard to the guidance and byelaws of the relevant Internal Drainage Board"*.

- Policy LP1 (A Presumption in Favour of Sustainable Development); Under this policy the council will take a *"positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework."*. This should mean that "*Planning applications that accord with the policies in this Local Plan will be approved without delay, unless material considerations indicate otherwise."*

- Policy LP16 (Delivering and Protecting High Quality Environments Across the District); The policy lists a comprehensive criteria that proposals for new development need to comply with. Whilst all criteria are relevant, of particular note is the need to retain and incorporate natural features such as trees, not to adversely impact the landscape character of the area in which the development will be located and to ensure amenity of neighbours is protected.

The other policies pertinent to this application are:

- Policy LP13 (Supporting and Managing the Impact of a Growing District) states that planning permission will only be granted where it can be demonstrated that existing infrastructure/ proposed infrastructure has the capacity to support the development.
- Policy LP15 (Facilitating the Creation of a More Sustainable Transport Network in Fenland) requires development schemes to be *"well designed, safe"* with *"convenient access for all"*.
- Policy LP18 (The Historic Environment) - The policy states that the council will *"protect, conserve and seek opportunities to enhance the historic environment throughout Fenland"*. Proposals are expected to have been properly assessed on their potential impact to heritage assets.
- Policy LP19 (The Natural Environment) - This policy emphasises the need for the natural environment to be protected as a result of new development proposals. Schemes should

"Ensure opportunities are taken to incorporate beneficial features for biodiversity in new developments".

The following emerging Fenland Local Plan 2021-2040 (anticipated adoption date March 2024) are considered relevant to the application but carry less weight:

- Policy LP6 - Renewable and Low Carbon Energy Infrastructure
- Policy LP7 - Design
- Policy LP8 - Amenity Provision
- Policy LP15 - Employment
- Policy LP18 - Development in the Countryside
- Policy LP19 - Strategic Infrastructure
- Policy LP20 - Accessibility and Transport
- Policy LP21 - Public Rights of Way
- Policy LP23 - Historic Environment
- Policy LP24 - Natural Environment
- Policy LP25 - Biodiversity Net Gain
- Policy LP27 - Trees and Planting
- Policy LP28 - Landscape
- Policy LP29 - Green Infrastructure
- Policy LP32 - Flood and Water Management
- Policy LP34 - Air Quality

7.1.2 Neighbourhood Plan

There is currently no adopted neighbourhood plan within FDC or in SHDC covering the site.

7.2 Other material considerations

7.2.1 National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) updated December 2023 sets out the national planning policies which apply to this proposal.

Both SHDC's and FDC's climate change and renewable energy policies provide in principle support for renewable energy. This clearly provides a local policy basis for the type of development proposed. Therefore, along with local planning policy, the Revised NPPF paragraph 11's presumption in favour of sustainable development is important. For decision-taking, this means: *"Approving development proposals that accord with the development plan without delay;"*

NPPF Paragraph 157 highlights the importance of the role of the planning system in the transition to a low carbon future by stating that it should help *to "shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and*

improve resilience... ....and support renewable and low carbon energy and associated infrastructure."

Paragraph 163 of the revised NPPF states that: "*When determining planning applications for renewable and low carbon development, local planning authorities should...*

- *"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*
- *Prove the application if its impacts are (or can be made) acceptable..."*

The NPPF directs 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*" (Paragraph 85). This is further elaborated on in paragraph 86(c) encouraging planning policies to "*seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*". Additionally, paragraph 88 of the NPPF requires the "*sustainable growth and expansion of all types of business in rural areas*." In particular, decisions should enable "*the development and diversification of agricultural and other land-based rural businesses*."

In building a strong competitive economy, the NPPF states that *"planning policies and decisions should recognise and address the specific locational requirements of different sectors"* (Paragraph 87). The Planning Practice Guidance for Renewable and Low Carbon Energy (updated August 2023) further clarifies that *"in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology..."* as well as impacts on the environment (Paragraph: 005 Reference ID: 5-005-20150618). Lastly, it is noted that *"examples of the considerations for particular renewable energy technologies that can affect their siting include proximity of grid connection infrastructure"* (Paragraph: 006 Reference ID: 5-006-20140306).

Chapter 15 of the NPPF focuses on the natural environment with paragraph 180 setting out the ways in which planning policies and decisions should *"contribute to and enhance the natural and local environment."* This includes *"minimising the impacts on and providing net gains for biodiversity."*

Paragraph 185 sets out the ways in which proposals should *"protect and enhance biodiversity and geodiversity."* Which includes identifying, mapping and safeguarding the *"components of local wildlife-rich habitats and wider ecological networks"*, and, at the very least, the conservation of priority habitats and ecological networks.

Under paragraph 186, the NPPF requires local authorities to refuse permission where *"significant harm to biodiversity resulting from a development cannot be avoided."* The paragraph continues to state that "*development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure*

measurable net gains for biodiversity or enhance public access to nature where this is appropriate."

Paragraph 200 of the NPPF requires applications to *"describe the significance of any heritage assets affected, including any contribution made to their setting"* with the level of detail being *"proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance"*.

7.2.2 National Planning Practice Guidance (NPPG)

The NPPG (updated November 2023) takes forward the policies and objectives of the NPPF and provides LPAs with guidance on decision making. The NPPG recognises the imperative for the UK to provide a secure energy supply to cope with the varying demand. The planning guidance has a separate chapter addressing Renewable and Low Carbon Energy and sets out a list of factors to consider when assessing ground-mounted solar projects as listed below (Reference ID: 5-013-20150327):

"Particular factors a local planning authority will need to consider include:

- *Encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value.*
- *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.*
- *That solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use.*
- *the proposal's visual impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety;*
- *The extent to which there may be additional impacts if solar arrays follow the daily movement of the sun.*
- *The need for, and impact of, security measures such as lights and fencing.*
- *Great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset.*
- *The potential to mitigate landscape and visual impacts through, for example, screening with native hedges.*
- *The energy generating potential, which can vary for a number of reasons including, latitude and aspect."*

7.2.3 Other national policy

To enable delivery of the commitments in April 2023's 'British Energy Security Strategy', a suite of new final revised Energy National Policy Statements (NPS) were published on 22nd November 2023. The documents comprise (NPS) EN-1 'Overarching need case for energy infrastructure', EN-3 'Renewable electricity infrastructure', and EN-5 'Electricity networks infrastructure'. The new documents set out the Government's overarching energy policy on renewables, as well as on gas, electricity generating stations, gas and oil infrastructure and electricity networks. These fully reflect the strategic importance of new energy infrastructure for delivering the UK's energy security and affordability and to deliver on net zero.

EN-1 states at 3.3.25 that "storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated". 3.3.36 emphasises that "storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher". It also states at 3.3.5 that "new generating plants can deliver a low carbon and reliable system, but we need the increased flexibility provided by new storage and interconnectors (as well as demand side response) to reduce cost in support of an affordable supply".

Paragraph 3.3.13 of EN-1 highlights that "*the Net Zero Strategy sets out the government's ambition for increasing the deployment of low carbon energy infrastructure consistent with delivering our carbon budgets and the 2050 net zero target.*" Paragraph 3.3.19 further explains the long-term thinking behind the renewable energy targets by stating that "*given the changing nature of the energy landscape, we need a diverse mix of electricity infrastructure to come forward, so that we can deliver a secure, reliable, affordable, and net zero consistent system during the transition to 2050 for a wide range of demand, decarbonisation, and technology scenarios.*"

Paragraph 1.1.2 of EN-3 goes on to clarify that there is an assumed need for renewable energy projects: *"electricity generation from renewable sources is an essential element of the transition to net zero… …our analysis suggests that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050. This could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables."*

Paragraph 3.3.20 of EN-1 highlights the importance of solar energy in the transition by saying that *"wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar."*

EN-3 further lists out the government's objectives towards solar energy:

- *"The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a key part of*

the government's strategy for low-cost decarbonisation of the energy sector" (Paragraph 2.10.9).

- "*Solar also has an important role in delivering the government's goals for greater energy independence and the British Energy Security Strategy states that government expects a five-fold increase in solar deployment by 2035 (up to 70GW). It sets out that government is supportive of solar that is co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use*" (Paragraph 2.10.10).

7.2.4 Supplementary Planning Documents (SPDs)

In relation to SPDs, we note the following documents to be of relevance for this application:

- Cambridgeshire Flood and Water SPD (adopted December 2016):

· Gives guidance on how development is to address flood risk and provides an applicant checklist. The SDP is to be used for: site selection, informing design, informing Flood Risk Assessments, informing landscape and surface water drainage schemes, informing delegated planning applications, selecting appropriate planning conditions, making recommendations for committees and summarising s106 contributions relating to SuDS.

- *Fenland Resource Use and Renewable Energy SPD* (Adopted July 2014)
  - S1: Surrounding landscape, townscape and heritage assets
  - S2: Residential and visual amenity
  - S3: Noise impact
  - S4: Highway safety, designated nature conservation and biodiversity considerations
  - S5: Aircraft movements and associated activities
  - S6: High quality agricultural land
- *Delivering and Protecting High Quality Environments in Fenland SPD* (Adopted July 2014)
  - DM2 Natural Features and Landscaping Schemes
  - DM6 Mitigating Against Harmful Effects
  - DM7 Land Contamination
  - DM8 Riverside Settings

8.0 Design & Access Statement

This section sets out the steps taken to appraise the context of the site and its surroundings and how the design of the development takes that context into account. The compliance with the planning policies as they relate to these specific issues is also summarised within each subsection to demonstrate that the scheme is acceptable in these regards, complies with the applicable planning policies and should be granted approval to bring forward this important scheme.

8.1 Design principles, layout, scale and appearance

Principles of good design were applied to the scheme's location, layout, scale and appearance to ensure design excellence in accordance with the NPPF and both SHDCs and FDCs design and climate change and renewable energy policies. This started with the choice of location within the land ownership boundaries and extended throughout the design process until the final layout and MEP was agreed.

The following principles of good design have been applied to the layout and design of the scheme:

- Use of habitat management and planting trees with shrub understory where necessary, to add screening, to vastly improve biodiversity credentials and to provide a transition between the site and the adjacent areas. This includes the creation of new habitats, maximising the wildlife/ biodiversity value of the site and establishing the long term management objectives for the ecological features on and around the site, to maximise wildlife and biodiversity informed by the comprehensive PEA and EcIA accompanying the application.
- Ensure no significant increase in flood risk within and off site. A Flood Risk Assessment along with Surface Water Management Plan was commissioned to help inform this.
- Ensure existing public rights of way are minimally affected during construction and operational phases and any potential views into the site from the PRoW are visually screened as best as possible through mitigation.
- Retaining the existing landscape setting, and working with the characteristically flat terrain and open views typical of the Fens and landscape features in the area to add visual interest through new natural screening – this has been informed by the LVIA.
- Contributing to a better understanding of designated and undesignated heritage and archaeological features, where possible, and to include appropriate mitigation measures including removal of panels if this was a suggestion by our heritage and archaeology expert. This has been informed by the Cultural Heritage Impact Assessment (CHIA) submitted in support of the planning application.

- Avoiding adversely impacting the amenity of residential properties, walkers and car drivers, including the impact from noise or glint and glare (see Glint and Glare Assessment).
- Ensuring battery safety and fire risk is taken into consideration through the submission of a separate Fire Risk Statement.
- Ensuring that trees are not unduly harmed and adequate protection is provided during construction through an Arboricultural Impact Assessment.

On this basis the scheme has demonstrated that it has been designed to meet the applicable planning policies which relate to design at the local and national level, as detailed above.

8.2 Site layout and design evolution

Once a deliverable site had been identified following the site search, detailed feasibility work was undertaken incorporating the design principles as specified under Section 8.1. This section details how the site area and layout has evolved through discussions with landowners, survey work, statutory consultees and the several community consultation exercises.

The specialist surveys of the final development area are summarised under Sections 8.3 - 8.9. Taking into consideration their recommendations and the findings, the layout has been refined, including equipment, maximum heights and mitigation and enhancement measures.

The layout has been designed to balance the technical design and efficiency of the operation with delivery of the design principles. These can be seen on the Layout Plan (UKZ157_09) and the MEP (UKZ157_10) demonstrates how any residual development impacts have been made acceptable. In summary:

- Ensuring suitable flood risk mitigation measures are adopted to reduce the risk of flooding across the site.
- Positioning solar panels at least 0.8m from the ground to allow for the grazing of the site by sheep but no more than 3.5m in height to minimise visibility from the surrounding area.
- Adding trees with shrub understory to act as screening across the site equivalent to 4.6km of new planting.
- Creating an environment that will significantly raise net gain in habitat of around 173%. As advised by our ecologist, a series of measures including wildlife gates, nesting boxes and new wood piles as refugia will be incorporated into the scheme to ensure the site encourages species richness.
- Small mammals will be able to pass under the bottom and/or through the wildlife gates installed within the security fence. New bird and bat boxes will be added to trees around the site as per the recommendation in the PEA.
- The scheme provides for large areas for sheep to graze and the vast majority of the site will be planted in a native wildflower meadow seed mix.

- The maintenance of wide field margins throughout the site which will improve connectivity between habitats.
- The retention of space either side of the PROW network within the site.
- To minimise disruption on local roads during construction whilst ensuring highways safety, the proposed traffic route will approach the site from the south, where the route is better able to accommodate larger vehicles. Traffic measures including advanced warning signs will be in place as detailed in the Transport Statement accompanying this application.
- To protect amenity, inverters and transformers have been positioned well away from homes and footpaths and should not be audible outside of the site.
- The position of the development relative to footpaths and homes, existing vegetation, topography, together with proposed new planting comprising new native hedges, have been used to minimise any risk of glint or glare.

8.3 Landscape and visual effects

The LVA prepared by Briarwood Landscape Architecture is submitted as part of this application. This assessment has helped shape the scale, layout and design of the scheme including mitigation measures and has been summarised below.

Paragraph 160 of the NPPF states that *"to help increase the use and supply of renewable and low carbon energy and heat, plans should"* maximise *"the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)"*. Furthermore, The NPPG (Reference ID: 5-013-20150327) states that *"the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively."*

At local level, SHDC Policy 2 (Development Management) requires schemes to demonstrate quality of design and Policy 3 (Design of New Development) requires schemes to consider the *"landscape character of the location"*. Finally Policy 31 (Climate Change and Renewable and Low Carbon Energy) requires proposals to *"employ a high-quality design"* and in the case of renewable development, take into consideration *"visual amenity, landscape character or quality."*

FDC Policy LP16 (Delivering and Protecting High Quality Environments Across the District) requires the need to retain and incorporate natural features such as trees, not to adversely impact the landscape character of the area in which the development will be located. Policy LP14 (Responding to Climate Change and Managing the Risk of Flooding) requires that in respect to renewable energy development, the impact on the surrounding landscape is taken into consideration.

The MEP (Drawing ref. UKZ157_10) illustrates the specific mitigation measures in terms of screening.

The site is not allocated for any designations identified nationally or locally and situated in a suitable location away from residential settlements. Landscaping provision and ecological enhancements are provided to enhance the design and environmental protections needed to be considered by local policy as referenced.

The LVA notes that the relatively low solar panels, the presence of existing retained site vegetation and the typically flat topography would help prevent them appearing overtly prominent or dominant a feature.

In appearance terms, the proposed solar farm would add some limited complexity to the character of the local landscape. However, the proposed solar farm development would retain the site's existing structure of drainage channels and individual field pattern and would not substantially affect the pattern of the wider landscape. The proposed development would maintain the overall pattern of the existing landscape expressed in the roads, areas of settlement and development, and agricultural land.

The proposed development would maintain the generally strong geometric/linear pattern of the existing landscape expressed in the roads, areas of settlement, land drains, crops and woodland blocks and tree belts (where they occur). The straight rows of panels would be consistent in their form to these existing typically linear features already present in the landscape.

In respect of notable views, features, and landmarks, their perception would not be unduly compromised or harmed with the proposals in place. The landscape elements and features in the surrounding landscape beyond the site boundary would be physically unaltered with the proposals in place. Any perceived changes in the character and appearance of the local landscape would be limited.

It is considered that the proposed solar farm would not completely redefine the character of the local landscape; the prevailing settled and agricultural character of the local landscape would remain. The key characteristics of the local landscape, which differentiate the local landscape from other areas, would not be fundamentally changed and would continue to prevail. On balance, it is considered that the proposed solar farm would result in an acceptable scale of effect on the character of the local landscape.

A detailed visual assessment of a selection of representative viewpoints indicates that higher levels of visual effects would generally be experienced from within or in close proximity to the site boundary. The public highway and PROW network surrounding the site is relatively limited so that the availability of public vantage points from which the proposed development would potentially be seen is similarly restricted.

Where potential views do exist, the proposed development would be seen only as discrete parts rather than in its entirety. The flat topography and generally low level of the component elements of the proposed development would ensure that typically only the outer edge of the solar array would be seen from a particular location rather than seeing the proposals in depth. The retention of the existing woodland copse and the proposed tree planting, once established

and filling out, would provide visual 'breaks' in the landscape from where areas of the proposed development would be screened from view.

Typically the proposed development would be experienced visually over a distance, and in a generally wide field of view, in which it is considered that the proposals would not appear unduly prominent or dominant. Overall it is considered that the proposed development would have a limited effect and harm on the visual amenity of the wider landscape beyond the site boundary.

In terms of its visual impact and impact on the landscape, taking on board the specialist advice, it is demonstrated that the proposal is acceptable in landscape and visual terms and therefore accords with the NPPF and SHDC Policy 2 (Development Management), Policy 3 (Design of New Development) and Policy 31 (Climate Change and Renewable and Low Carbon Energy) of the SEL Local Plan and FDC Policy LP16 (Delivering and Protecting High Quality Environments Across the District) and Policy LP14 (Responding to Climate Change and Managing the Risk of Flooding) of the FDC Local Plan.

8.4 Heritage and archaeology

A Heritage Impact Assessment (HIA) has been submitted with this application. A separate Archaeology Impact Assessment (AIA) is currently in preparation by Abrams Archaeology, specialist consultants with extensive experience of advising PACE in relation to heritage and archaeology impacts. This will be submitted shortly.

SHDC Policy 31 (Climate Change and Renewable and Low Carbon Energy) requires renewable energy schemes to ensure *"no significant harm to heritage assets including their setting."* Additionally, SHDC Policy 28 (The Historic Environment) requires the preservation and where appropriate, the enhancement of the *"historic, archaeological and drainage landscape of the Fens"* The policy requires developers to take *"every reasonable step"* to protect and, where possible, enhance the significance of archaeological remains whether known or unknown.

FDC Policy LP14 (Responding to Climate Change and Managing the Risk of Flooding) requires that in respect to renewable energy development, the impact of development on heritage assets is taken into consideration. Additionally, FDC Policy LP18 (The Historic Environment) states that the council will *"protect, conserve and seek opportunities to enhance the historic environment throughout Fenland"*. Proposals are expected to have been properly assessed on their potential impact to heritage assets.

The AIA will include the results of several stages of work comprising consultation, documentary research, a historic map regression and analysis of the local Historic Environment Records. This will also include a summary of the geophysical and geoarchaeology surveys that were commissioned. These activities are used to help understand and predict the archaeological potential of a piece of land. The process of consultation began in October 2022 including a

meeting with the Cambridgeshire CC and Lincolnshire CC archaeological officers. We have written to Historic England seeking their views on potential heritage setting matters.

The process of impact assessment in regards to the HIA will first identify heritage assets which may experience change as a result of the proposals. Where necessary we would gather additional data to better understand the potential and the risk. Where that change could be negative in a direct or indirect way, we would seek to reduce or remove the effect. Where that could not be done, mitigation measures would be taken in line with current Policy and Guidance. Where positive change could be the result, we would seek to recognise and amplify that. In any case comments made during consultation will be taken into consideration post submission.

The findings of the heritage impact assessment and archaeological baseline assessment have been summarised as per the following:

9.4.1 Heritage

The nearest Scheduled Monument is noted as approximately 4km away to the north at Boundary cross, Old Fen Dike. The nearest listed buildings are the Grade II Church of St Edmond located 1.0km to the west of the site and Grade II listed Honeyhill Farmhouse 1.5km south of the site.

The baseline work confirmed that there were no designated heritage assets within the site. However, the advice noted the cluster of listed buildings at the settlements of Parsons Drove and Wisbech and further examples around the site. The advice considered that whilst *"intervisibility can be better in such flat landscapes…Heritage Setting is not all about intervisibility and so this may not be an issue."*

The feasibility advice refers to the earlier appeal decision for a wind farm scheme on the site under ref. APP/D0515/A/12/2181777 and APP/A2525/A/12/2184954 which were refused by the Secretary of State for several reasons including heritage grounds. Our heritage consultant commented that whilst *"wind turbines are very different in setting impacts to solar…there may be some useful lessons to be learnt from that decision."*

The decision clearly identified the heritage assets that had the potential to be affected by the proposal. The SoS's decision noted that the character of the broad flat fenland landscape and the contribution that the wider setting makes to their heritage significance has changed over time; apart from agricultural methods of cultivation and industrial means of raising livestock in large buildings, other artificial or man-made items have become part of the accepted view such as pylons and masts. However, in this case, the proposal was considered to harm the setting of the heritage asset at Guanock House in opposition to the *"mainly intimate internal vistas"* contrasting with the *"flat far-reaching fens which are glimpsed through gaps and over boundary planting."*

Our heritage consultant noted that, whilst there were heritage risks, these were not considered unmanageable. Our heritage consultant has worked with Heritage England in assessing the

heritage impacts of the proposed scheme and Heritage England does not have concerns about the impacts of the site

9.4.2 Archaeology

The baseline assessment notes that the site is located to the west of a Roman Bank stating that *"It dates to a more recent time (early Mediaeval) and was an effort to establish a dry area of land west of that bank, which could be more reliably farmed."* The assessment refers to the previous wind farm application and the findings of the archaeological investigation that was undertaken. Our consultant noted that *"There were some low significance archaeological features recorded but generally the evaluation recorded that the land has a low potential (for archaeology)".*

Abrams Archaeology concluded their feasibility by suggesting *"the site has relatively low archaeological risk, for a Fenland site"* with no signs of *"spectacular survivals of archaeology"* as found elsewhere in the region. However, it was noted an assessment and evaluation of below ground archaeology will be required.

Given the key deposits are deeper than normal on this site, a geophysical survey is unlikely to unravel much value. As advised geophysical and geoarchaeological surveys were undertaken for which the results are awaited at the time of writing. A Written Scheme of Investigation (WSI) for both the geophysical and geoarchaeology was produced under the guidance of both LCC and CCC archaeology officer's. These documents have been approved by the respective officers.

The surveys will help decide the best approach to evaluation including potentially targeted boreholes.

Should significant archaeology be discovered through the trail pits/boreholes, we would consult further with the both Cambridgeshire and Lincolnshire County Archaeology teams and agree the most appropriate way forward. If necessary, a Planning Condition could be attached to any permission granted by Fenland District Council to either preserve in situ or to investigate and record the findings.

In this regard the CHIA will help demonstrate that the proposal will be acceptable in terms of its impact on archaeology across the site and the setting of the nearest heritage assets and ensure compliance with both the NPPF and SHDCs and FDCs renewable energy and historic environment policies.

8.5 Transport and access

SHDC Policy 31 (Climate Change and Renewable and Low Carbon Energy) requires renewable energy schemes to ensure *"there would be no significant harm to highway safety (including public rights of way)".* Policy 2 (Development Management) requires that *"sustainable*

development considerations are met, specifically in relation to, access and vehicle generation levels."

FDC Policy LP14 (Responding to Climate Change and Managing the Risk of Flooding in Fenland) requires that for renewable energy development, *"specific highway safety"* is taken into account. Additionally, Policy LP15 (Facilitating the Creation of a More Sustainable Transport Network in Fenland) requires development schemes to be *"well designed, safe"* with *"convenient access for all"*.

A Transport Statement has been produced by Apex Transport and is included with the planning application submission. This shows that the safest and least disruptive route for construction and operational vehicles to enter and exit the site have been chosen. The Statement analyses how the proposed route is capable of accommodating the traffic requirements for the construction of the scheme.

It provides:

- estimated number of vehicles
- details of the frequency and duration of movements
- delivery hours and timing
- consideration of public comments on this issue
- vehicle routing considerations
- swept path analysis
- traffic management proposals during operation
- details of the access points

In regards to the site when in operation, the Transport Statement notes that *"all routine maintenance including cleaning, ground keeping, inspection and preventative maintenance will be carried out by vehicles no larger than vans."* This enables existing access routes to be used and limits transport issues with the wider community.

There will be approximately 1-2 visits per month resulting in a maximum of 4 vehicle movements during operation.

The accompanying report demonstrates that both the nominated route and site access can accommodate the largest vehicles proposed. Additionally the route will not disrupt local traffic in the area nor would the scheme inconvenience or compromise the safety of other road users.

In terms of its impact on transport and highway traffic and safety, the proposal complies with the relevant SHDC and FDC local policies together with the relevant provisions of the NPPF.

8.6 Flood risk and drainage

The site is identified as falling within Flood Zone 3a thereby presenting a high risk of flooding. The applicant was required to ensure that the proposal did not increase flood risk across the site as a result of the proposal.

A preliminary Flood Risk Assessment (FRA) along with surface water drainage strategy was undertaken by Floodline consulting. The results of this were discussed with both Cambridgeshire County Council (CCC) and Lincolnshire County Council (LCC) as Local Lead Flood Authority (LLFA) as part of the pre-application advice service. Floodline consulting also engaged the Environment Agency for pre-application advice on flood risk.

The preliminary FRA concluded that the overall risk of flooding across the site in its current state is 'low' with *"no record of any form of flooding at the site as confirmed by the EA and in both Councils SFRAs."*

Given that the site is classified as 'essential infrastructure', a Sequential and Exceptions Test are required. The preliminary FRA concluded that *"A Sequential Test for a site of this magnitude is highly unlikely to result in a classification lower than the existing classification due to the borough wide topography and widespread nature of perceived flooding in the area. Therefore, it is unlikely sequentially testing the site would result in finding a more suitable site based on exposure to flood risk."*

Pre-application advice from the EA received in June 2023 following a virtual meeting raised no concerns with the EA stating that they *"do not have any concerns with the proposed solar farm development and anticipate that we would have no objections to the planning application from a flood risk perspective."*

They confirmed that due to the classification of the site as 'essential infrastructure' the scheme would need to remain operational during a flood and that the proposed mitigation (raising of panels from the ground and no blocking of overland flows) was considered acceptable.

Pre-application advice from both LCC and CCC as LLFA across the site was sought. Whilst LCC confirmed they did not offer a formal pre-application service, they stated that *"In the case of Solar Farms, the received wisdom is that the individual array panels, being angled so as to optimise the collection of sunlight, cast any water falling upon them onto the ground directly beneath their lower edge. Rainwater then infiltrates into the ground within a metre or so of where it would have fallen had the array panel not been there. Surface water run-off is thus not concentrated in any one area and should not therefore increase surface water flood risk."*

The informal advice noted that the access roads/tracks within the solar farm should be *"constructed of unbound material that will allow direct infiltration or, if the road has to be a sealed surface, swales or filter drains should be constructed alongside, so that surface water is dissipated evenly throughout the site and not concentrated in any specific areas."*

The formal pre-application advice provided by CCC noted low surface water risk. In respect to local watercourses, the advice states that *"The site layout should account for the existing drainage infrastructure, ensuring clear access for maintenance of all components of the drainage system by a management body. This should include a suitable easement for any maintenance equipment that may be required for future maintenance works."*

In regards to the Surface Water Drainage Strategy, the letter states that *"Infiltration is the first choice for surface water disposal"* with consideration to be given "*to the impact that solar photovoltaic farms have on infiltration."* The LLFA's concluding sentiments regarding surface water drainage is that *"it should be ensured as part of any proposed scheme that grass or wildflower cover will be well-maintained across the site to ensure that proposed schemes will not increase the surface water run-off rate, volume or time to peak compared to the pre-development situation. This will also help provide net biodiversity gain."*

The FRA and SWMP submitted with the application takes into account the above pre-application advice and inline with the preliminary FRA and discussions with the EA and LLFA, the proposals were assessed to have low risk in flooding terms with surface water flows adequately managed through sufficient on site mitigation.

In this regard the proposal complies with the relevant SHDC and FDC local policies together with the relevant provisions of the NPPF.

8.7 Amenity

The various components of amenity are considered below.

9.7.1 Pollution

The scheme will not result in any significant pollution. Potential nuisance would be limited to short-term noise through vibration, vehicle movements, and dust potentially created during the construction period and these can satisfactorily be controlled by condition and mitigation.

To this end, a management plan is proposed and this will be the subject of detailed discussion with officers as part of the application assessment stage to ensure all potential impacts are satisfactorily controlled. The nature of solar energy means that no hazardous, toxic or noxious substances will be released, nor will there be a risk of contamination to air, water or land. There will be minimal impact on visual amenity due to the layout of the scheme, as described in Section 9.3. No artificial lighting will be used and should it be required for emergency maintenance then it will be temporary.

9.7.2 Noise impact

The applicant has considered the potential for nuisance from noise from the operation of the solar farm. A Noise Impact Assessment to the relevant British Standard has been prepared and has been submitted as part of this application.

The NPPF refers to the Noise Policy Statement for England (NPSE) which applies to all forms of noise and includes environmental noise. The NPPG reflects the NPSE stating that noise needs to be considered when new developments may create additional noise and that opportunities should, where possible, be taken to improve the acoustic environment. Additionally, Policy AP 2 (Renewable Energy) of the Allocations Plan requires proposals to appropriately address environmental factors such as noise as part of the proposal and consider the *"separation distances from: Residential dwellings in order to protect amenity and to minimise any impact of noise"*.

In the context of this site, being open greenfield land, the background noise levels are expected to be typically low and the level of noise generated from the development should not significantly exceed this.

Inverter cabins with transformers are located away from the site edges and as centrally within the site as possible. This equipment predominantly sits along the access track running from a north to south direction between Fields T and J, U and I, V and W and W and X. The longest branch of the access track then continues in an eastern direction between Fields E, D, C and Fields A and B with approximately 5 cabins along the route.

The design layout takes into consideration proximity of this equipment to the nearest residential properties. If conflict in position of inverter cabins arises further design iterations can be discussed such as location of inverter cabins.

The inverter cabins also generate some noise during operation (i.e. daylight hours) in warmer weather. Again, these have been located away from residential properties. The relatively low level of noise, generated only during daylight hours, and the distance from properties means there should be no risk to the amenity of nearby residents.

The BESS compound will also be considered as part of the assessment but has been located in the middle of the site and near natural acoustic obstacles in order to prevent any harm to residential amenity. An acoustic barrier has been included as part of the proposals.

In terms of noise impact on surrounding amenity the proposal is considered acceptable and complies with the NPPF and SHDC Policies 2 (Development Management), 3 (Design of New Development) and 30 (Pollution) of the SEL Local Plan (March 2019). The proposal also complies with FDC Policy LP16 (Delivering and Protecting High Quality Environments Across the District) of the Fenland Local Plan (May 2014).

9.7.3 Glint and glare

A Glint and Glare Assessment has been prepared by Pager Power and accompanies this application. The report considers that the scheme will not result in any significant going and glare impact on any sensitive receptors surrounding or close to the site. In this regard the

proposal is acceptable when assessed against both FDC's and SHDC's amenity policies and the relevant part of the NPPF.

8.8 Battery safety and fire risk

SHDC Policy 3 (Design of New Development) requires proposals to demonstrate *"community safety"* has been considered. PACE has prioritised community safety at every stage of the design process, engaging with Jensen Hughes to produce an additional fire risk statement that outlines the strategies that have been included in the design to prevent any potential hazards.

There are several types of battery storage technologies available in utility scale energy storage systems. Lithium Iron Phosphate, a type of Lithium Ion Battery, is the preferred technology of choice for the solar farm. However, PACE will also evaluate other options during the final design stage, post determination of the application.

Lithium-ion batteries are considered exceptionally safe, however they can pose an extremely small fire risk when operating under extreme conditions, where internal cell damage, mechanical defects/failure or overvoltage can lead to an excessive heating cycle known as thermal runaway. This is incredibly rare but nonetheless important to very robustly mitigate and consider from the outset.

PACE are well aware of any potential hazards and are committed to integrating risk management throughout the project lifetime from planning & procurement through to operation & decommission. PACE has adopted a three-pronged approach to effectively mitigate the risk of thermal runway through monitoring, prevention and reaction. This can be detailed in a Fire Safety Plan (FSP) should this be required as part of a planning condition.

9.8.1 Monitoring

From the outset each of the battery storage containers are monitored through inbuilt sensors for factors such as temperature and voltage. The monitoring is undertaken 24 hrs a day, year round via an off site contour station. A physical inspection of the battery storage and other equipment will be made on a periodic basis.

9.8.2 Prevention

As part of the measures to prevent a fire the battery modules would be insulated from external conditions, with the cells designed so that in the event of the temperature reaching a threshold value power to the cell is 'cut off' to prevent the temperature rising and the cell coating preventing thermal runaway.

The equipment contains a cooling unit to help keep the batteries at a regulated temperature. Each container will also house an active cooling system to keep the temperature within the

container at a suitable temperature. Finally, the sufficient separation of 3m between each container will help to prevent any fire that does start, from spreading.

The equipment also includes an automatic fire detection and alarm system that provides early fire detection and alarm capabilities. These capabilities are, in turn, supplemented by an automatic fire suppression system that, in the event of a fire, can help prevent its spread in conjunction with the other safety measures noted above.

9.8.3 Reaction

In this case of a fire, PACE will, in collaboration with the local Fire and Rescue Service (FRS), establish a protocol to deal with a fire even at the site. This will include supplying the FRS with details of a dedicated point of contact that is briefed on fire safety measures at the site. This contact will be updated regularly. The FRS will also have access to the main gate.

Other on-site measures that will be built into the design of the battery storage will be exhaust vents placed at the top of the container to release any gas upwards and away from other containers and the possibility of providing a water tank if this was considered necessary by the local FRS.

The proposal presents practically no fire risk given the nature of development. There will be detailed design measures to reduce the risk of fire including 24 hour CCTV monitoring of the equipment on site. Additionally, it is noted that other regimes address these safety aspects and central government advice is clear that it is not the role of the planning system to duplicate other regimes.

The proposal presents a safe form of development which will be designed and maintained to the highest industry standards in compliance with the relevant legislation and good practice.

In considering the approach agreed to reduce the risk of a fire and measures to prevent this, or if it does occur, measures to prevent the fire from spreading, the proposal is considered acceptable and poses an extremely small but managed risk, in accordance with the NPPF and the relevant local policies.

8.9 Impact on trees

The proposed BESS is located approximately 10m from the edge of the wooded copse located centrally within the site (but outside of the red line area). These are the only trees that have the potential to be affected by the proposal.

Arboricultural consultancy, A T Coombes has undertaken an Arboricultural Impact Assessment (AIA) with the impact of the proposal on the trees assessed against the requirements of BS5837:2012 . The findings from their report confirm that no trees will need to be removed for development purposes. The AIA also noted that *“All the retained trees will be provided with*

proper protection as set out in BS5837:2012 during the construction phase. Protection measures will include erecting temporary protective fencing, pre-emptive root pruning and careful excavation in relation to the boundary fencing as appropriate."

The report notes that the trees, grouped into 3 individual trees and 4 groups, can be categorised as Category A and C trees. are noted as being in *"generally in good condition and confer landscape values"* with all of the trees being provided with protection in accordance with BS5837:2012.

The AIA notes that part of the internal access track *"encroaches slightly into the RPA of the A category tree T1"* but that this *"will be addressed by carrying out pre-emptive root pruning"*. Any holes needed for the boundary within the RPA of the retained trees will be *"excavated carefully to ensure that major roots are not severed the surrounding roots are protected from leachates "* associated with building material from the access track and BESS base.

The assessment concludes that the *"proposed development will have a minimal impact on trees across the site. The protection measures outlined within this report will ensure that trees remain intact and protected throughout the construction process."*

In this regard the proposal complies with adopted natural environment policies of both FDC and SHDC and Policy LP27 (Trees and Planting) of the emerging Fenland Local Plan (August 2022).

8.10 Coal mining risk

A search of the Coal Authority's database confirms that the site is not located within a Coal Mining Reporting Area; therefore a report is not required for this property.

8.11 Construction waste

The specialist contractor hired to construct the solar farm will ensure that all waste is disposed of responsibly from the site. The removal of waste products from site will be minimised by recycling of excess materials wherever possible. The guidelines contained in the statutory guidance, Waste duty of care; Code of Practice, 2018 will be adhered to.

The potential waste generated during the construction process will primarily be related to packaging and potential measures to minimise the impact of construction waste are as follows:

- The pallets that the solar panels are packaged in. These will be either wood crates, or cardboard boxes and will be removed from the site on a regular basis. If they arrive on wooden pallets then these will be returned to the manufacturers. If they arrive packaged

in cardboard boxes, then these will be removed from site on a regular basis through a hired skip/s.
- Packing materials for various components, such as screws, cabling, and mounting frames. Any non-recyclable waste will be stored in a skip for regular removal to an appropriate landfill.
- Food waste from workers. Personal rubbish will be collected along with non-recyclable packaging materials, for appropriate disposal.
- Portable toilets will be hired for the duration of the construction period.
- The site involves some ground works for access tracks, cable trenching, cabinet platforms. Excavated soil will be used for backfilling activities. Excess subsoil will be removed from the site and disposed of appropriately or sold to a landowner needing additional soil.
- All spoil or waste that needs to be transferred out of the site for reuse, recycling or disposal purposes will be collected and transferred by vehicles from registered licensed contractors.

A more detailed Construction Waste Management Plan can be conditioned and produced by the contractor, either as part of combined Construction Traffic Management Plan (CTMP) or through updating the Construction Environmental Management Plan (CEMP) post determination.

Appendices

1. EIA Screening decision from FDC
2. EIA Screening decision from SHDC
3. Example Briefing for Parish/Ward Councillors
4. Leaflet for local residents (October 2022)

(See separate uploads to the Portal)