Intelligent Alternatives
Releasing revenue from your assets

Our Ref: 339-04-PV

[redacted]

100 Brand Street
Glasgow
G51 1DG

[redacted]

Mr. Stephen Cornwell
Planning Services
Winchester City Council
City Offices
Colebrook Street
Winchester
SO23 9LJ

(by email only)

26 May 2022

Dear Stephen,

21/01391/FUL - Solar farm and associated development, land at Locks Farm, Botley Road

Opening

I write in response to the consultee and public comments on the above application, as well as the clarifications you requested.

The majority of the LPA's consultees support or have no objection to the application, and I trust the extra information addresses the outstanding issues.

There is public support for, and objection to, the application. We are grateful for the input of the public and consultees in terms of improving the development, further reducing and mitigating impacts, and incorporating further benefits, as detailed in the relevant sections below.

It is noted that there was substantial objection to a previous gas powered energy scheme nearby, coordinated by an objector to this application. At that time, there was an acknowledgement of the solar farms in the area and a statement that "we have a lot of solar energy in Bishop's Waltham and we aren't people who complain about things like this"[1].

Objectors' stances on the application therefore seem to at odds with their previous views on solar, and with the continued and increasing public support for renewable energy developments (only 3% of people oppose), and solar being the most popular source of renewables (only 1% of people oppose) based on the most recent public attitudes tracker[2].

Energy Policy and Guidance

[1] https://www.portsmouth.co.uk/news/politics/residents-oppose-proposal-new-power-station-bishops-waltham-1010478
[2] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1064032/BEIS_PAT_Winter_2021_Energy_Infrastructure_and_Energy_Sources.pdf

Since the submission of the application, a range of policy and guidance has been published. This builds on the existing 'direction of travel' towards tackling climate change through the deployment of further renewable energy generation capacity. This has culminated in The British Energy Security Strategy (the ESS), published in April, which aims to drastically increase the development of ground mounted solar (see below for more details).

In the lead up to the UK hosting the United Nation's Climate Change Conference of the Parties (COP26) in Glasgow, the IPCC published the first part of their Sixth report[3], which indicates that human influence has warmed the climate at an unprecedented rate, and stated that urgent action and cooperation is required to slow down the rate of global warming, including a global cumulative effort to reach carbon net zero.

The 'Net Zero Strategy: Build Back Greener' (published October 2021, hereafter referred to as the NZS) emphasises the need to reach carbon net zero by 2050 and fully decarbonise the electricity sector by 2035, with the Prime Minister stating that this strategy will make "historic transitions to remove carbon from our power". The NZS recognises that fundamentally "A low-cost, net zero consistent electricity system is most likely to be composed predominantly of wind and solar generation, whether in 2035 or 2050" and will assist where possible to accelerate the deployment of low-cost renewable generation.

The most recent IPCC publication (February 2022) from the second Working Group quantifies the extent to which climate change is damaging ecosystems and human systems worldwide, and states that "Global warming, reaching 1.5°C in the near-term, would cause unavoidable increases in multiple climate hazards and present multiple risks to ecosystems and humans".

Most recently, the ESS was published in April 2022 and sets out the Government's up to date strategy for "secure, clean and affordable British energy for the long term".

The existing solar capacity of 14GW is noted, and the split between large scale projects (larger than the application) and smaller roof top installations is acknowledged. A five fold increase in deployment is expected by 2035.

Specifically in terms of solar farms, the Government will "consult on amending planning rules to strengthen policy in favour of development on non-protected land" such as the site (which is poorer quality land, outside the flood zone and other designations such as the National Park, ecological designations, the Green Belt, Conservation Areas etc). The Security Strategy states that "we will support solar that is co-located with other functions (e.g. agriculture … or storage) to maximise the efficiency of land use".

Page 30 of the ESS sets out the following "objectives and key measures" for solar:

[3] International Panel on Climate Change, AR6 Climate Change 2021: The Physical Science Basis, Working Group 1 contribution to the Sixth Assessment Report of the IPCC

Solar
Ramp up deployment, on both roofs and ground

Key measures	End 2022 ambition	2023 ambition	2024 ambition	2025 ambition	2030 ambition	2050 ambition
• Consult on amending planning rules to strengthen policy in favour of solar development • Consult on reviewing permitted development rights to support solar deployment • Explore low-cost finance options with retail lenders to help households install rooftop solar • Design performance standards to further encourage renewables, including solar PV, in new homes and buildings	• Publish updated planning documents to support solar deployment • Bring the Part L Homes Standards interim uplift into force, enabling solar deployment as a route to compliance	• Contracts for Difference auction	• Enable improvements in network infrastructure and connectivity; streamline network charging rules • Contracts for Difference auction	• Future Home Standard and Future Buildings Standard in force, further uplifting energy performance in new homes and buildings • Contracts for Difference auction	• This could be **up to 70GW of solar by 2035**	• A low-cost, net zero consistent electricity system, most likely to be composed predominantly of wind and solar generation

British Energy Security Strategy, Page 30

It is important to note that this specifically states "ramp up deployment, on both roofs and ground" (emphasis added) in terms of the alleged lack of government support for ground mounted solar including solar farms.

By 2035 the objective is to have deployed up to 70GW of solar, and the long term (2050) objective is "a low-cost, net zero consistent electricity system, most likely to be composed predominantly of wind and solar generation" (emphasis added).

The Strategy therefore lends strong support to the proposed development (contrary to at least one objection comments which claims there is no support in principle for solar farms) as ground mounted solar is noted as forming a key part of the overall "ramp up" of solar deployment. Furthermore, the proposals are located on poorer quality land, the land will continue to be able to be farmed and it is co-located with storage (in the form of the on-site BESS).

All of the above builds on the strong support in principle for the proposed development and lends substantial weight to the benefits of the proposals.

Amended Layout

Layout Revision E7 is submitted. This is now based on the use of 'string' inverters and the proposed battery storage system (BESS) element of the development has been moved south, away from Locks Farmhouse, as suggested.

The revised noise assessment (see below) is based on this amended layout.

The revised layout also shows the newly proposed permissive footpath along the proposed access track (see below for details).

The Landscape Masterplan and SuDS layout have been updated to reflect Revision E7 of the layout.

A revised location plan has been submitted to show the land outside the red line boundary that is, and is not, associated with the applicant and the landowner. There is no third party land within the application site including along Botley Road.

Community Engagement

As requested, the following sets out a brief summary of the community engagement efforts to date.

An EIA Screening Opinion requested was in submitted on 7 May 2020 and the LPA adopted EIA Screening Opinion 20/00391/SCREEN on 17 June 2020.

Bishops Waltham Parish Council were approached by email in November 2020 then again in April 2021 when we were close to submitting the application. Shedfield Parish Council were approved by email in November 2020. Councillors written to in November 2020. No responses to these approaches were received.

The offer of meeting with Parish Council(s), attend their meetings virtually (noting the relevant Covid-19 restrictions) or in person, were not taken up.

Nearby residents were written to on 13 October 2020 and as early as the following day some residents emailed me with some queries, specifically regarding access arrangements. Clarifications were provided and received, and the access arrangements were changed to avoid the private lane between the solar farm and Botley Road, with the new purpose built access point and new access track proposed instead.

One nearby resident (who was also written to on 13 October 2020) emailed me for the first time in May 2021. Plans were made to meet on site to discuss to the proposals however before these could be finalised they submitted a long and detailed objection to the application. It was considered that the appropriate approach was to receive their views on the application and respond as appropriate by amending the application / providing clarifications through the LPA through the public planning process, rather than have parallel discussions.

Overall, it is considered that the local feedback has enabled the improvement of the proposals by suggesting a more suitable access arrangement and reducing noise impacts.

Most positively in terms of the benefits of the proposals, we are grateful for the input of the local ramblers group, who suggested a new permissive path on the proposed access track. This has been incorporated into the development and is shown on the revised layout. This will improve linkages in and around the local footpath network and avoid 'doubling back' on Botley Road, as well as reduce the length of time walking on / adjacent to the highway.

I will contact the Parish Councils and nearby residents to explain how the proposals have been amended, and explore the scope to engage further through attending meeting(s) and further correspondence as need be.

<u>Ecology and BNG</u>

A revised Biodiversity Management Plan is submitted along with a full biodiversity net gain (BNG) calculation based on the Natural England 3.0 metric, as requested.

This quantifies that the anticipated BNG based on the following enhancements is as follows:

22.27% habitat gain; and

42.84% hedgerow gain.

The BNG requirements of the Environment Act are not yet active, will require at least 10% BNG and for the measures to be managed for at least 30 years. The proposed BNG far exceed the 10% minimum

and will be managed for at least 40 years. As such it is considered that the proposed BNG is substantial in nature and is fully in line with the long term aspirations of policy and guidance on this matter.

Whilst it is understood that the Council's ecologist is generally happy, in terms of queries raised (11 October 2021), the following clarifications can be provided.

The BNG calculation takes into account the removal and replanting of hedgerow including at the access point on Botley Road. The extent of hedgerow removal has been reduced substantially, which is a key improvement.

Dormice have been taken into account through protection measures (set backs from hedges and trees as best possible) and where removal is required, this will be timed to avoid sensitive periods or undertaken under the supervision and approval of an Ecological Clerk of Works.

It is suggested that a condition secures the approval of a Construction Environmental Management Plan (CEMP) which would secure all requirements in one document, with input from contractor(s) and specialists as need be. This can cover pollution control (primarily run off around the watercourse). A lighting plan and a pre-start badger survey can also be secured through condition.

Carbon Intensity

The Council's sustainability officer notes that decarbonising the energy system is a key element to obtaining carbon neutrality in Winchester by 2030, as per the Council's declaration of a climate emergency and the Council's Carbon Neutrality Action Plan. It is noted that the proposals "represent a significant contribution to the district carbon neutrality target of 2030".

The anticipated output of the proposals will power the equivalent of c. 5,500 homes in the local area.

In terms of CO_2 savings from the development, the National Grid (and partners) have developed a carbon intensity tool, the methodology of which includes a comparison of alternative forms of electricity generation:

Table 1: Carbon intensity factors for each fuel type and interconnector import [2][3].

Fuel Type	Carbon Intensity gCO_2/kWh
Biomass[i]	120
Coal	937
Gas (Combined Cycle)	394
Gas (Open Cycle)	651
Hydro	0
Nuclear	0
Oil	935
Other	300
Solar	0
Wind	0
Pumped Storage	0
French Imports	~ 53
Dutch Imports	~ 474
Belgium Imports	~ 179
Irish Imports	~ 458

Table 1 from "Carbon Intensity Methodology Regional Carbon Intensity", available at https://carbonintensity.org.uk/

The carbon intensity of solar is 0g CO_2/kWh, compared to the other CO_2 generating forms of electricity generation in the South England region:

Coal: 937g CO_2/kWh; and

Gas: 394g CO_2/kWh to 651g CO_2/kWh.

It is anticipated that the solar farm will produce c. 16,000,000kWh (c. 16GWh) of electricity annually. To do so using gas would generate between c. 6,300 tonnes and 10,400 tonnes of CO_2. To do so using coal would result in c. 15,000 tonnes of CO_2.

Overall, it is considered that there is strong policy support for the proposals, substantiated by the equivalent number of homes powered and the above CO_2 figures.

Highways

The most recent highways comments received are those dated 22 October. These confirmed that all issues were resolved other than a query regarding trip generation. This has been responded to via the email of 10 November 2021, the salient content of which is set out below.

> "In terms of the number of HGV deliveries for the panels, a potential panel manufacturer's specification indicates that 496 550w panels could be delivered in each 40 foot container which arrives at the site on an artic lorry. As you're aware, the access point has been designed to allow standard artic HGVs, and this would be the most efficient method of transporting the panels to the site.
>
> 18MW project = 18,000,000 watts

18,000,000 / 550w = c. 32,730 panels

32,730 panels / 496 = 66 containers

The ITMP is based on 95 artic movements for panels, so has overestimated / taken a more conservative approach.

As such, we consider that the estimated numbers in the ITMP are generally robust for planning decision making purposes at this stage".

In addition to the above clarification regarding trip generation, suitable visibility splays can be delivered based on the applicant's speed survey. These are entirely on the application site and the adopted highway, and the highways officer has confirmed that this approach is acceptable. The highways officer confirmed that there is no obligation to take third party survey data into account.

Nonetheless, it appears that slightly longer visibility will be possible to the left / west of the proposed access without any further hedgerow removal. This indicates the general and overall suitability of the proposed access point's location and the proposed visibility splays.

Revision B of the ITMP is submitted with a slightly amended junction design as per discussions with the highway officer. This includes reducing the 'x' distance to 2.4m (which remains in line with HCC guidance). In turn this reduces the extent of required hedgerow removal and replanting from c. 130m to c. 40m, which is a considerable improvement on the original design of the access.

I trust this resolves the highways issues for the application.

Noise

A revised noise assessment is submitted based on the amended layout (with the BESS located slightly further south) and the change in technology to string inverters. This reflects the feedback from the Council's EHO and the third party noise comments have also been reviewed and responded to as need be.

Landscape and Visual Impacts

It is noted that the Council's landscape officer is generally happy with the submitted LVIA.

Please refer to the response of 21 September 2021 with regards to the comments from the National Park.

Heritage Issues

It is noted that there is no objection from Historic England and that the LPA's archaeology consultant is happy with the information submitted to date.

A revised Historic Environment Desk Based Assessment (HEDBA) is submitted, noting the recent listing of Locks Farmhouse and associated granary. The HEDBA states that:

"A conclusion of less than substantial harm is found in respect of the setting of Locks Farmhouse, and by association the associated Listed granary building. Harm is found to lie at the lower end of the scale".

I would highlight the detailed content of the HEDBA regarding the two new listings, and make the following comments specifically in response to the comments entitled "Application 21/01391/FUL. Substantial harm to Listed heritage assets and their setting" received by the Council 12 April 2022.

The comments seem to be based on the erroneous assumption that if a development affects the setting of a listed building, it must not be approved. This is clearly not the case, as proposals are assessed against the development plan and planning policy (and law) as a whole. Decision makers are well aware of the requirement to comply with Sections 66 (and 72) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Nonetheless, turning in more detail to the comments, they state that the: "setting and the "group value with Bishops Waltham Palace, a Scheduled Monument" are the principal reasons for the inclusion of Locks Farmhouse on the List of Buildings of Special Architectural or Historic Interest (Grade 2) by the Secretary of State".

However, the "Reasons for Designation" in the listing[4] itself seems primarily focused, in terms of volume and nature of content, on the architectural interest of the building, alongside the historic interest. This is at odds with the objector's stance that the setting and group value are the "principal reasons" for the listing:

> *"*Locks Farmhouse a C17 farmhouse, extended and remodelled in the late C19 and further extended in the C20, is listed at Grade II, for the following principal reasons: Architectural interest: * although altered in the C19 and C20, the farmhouse retains a substantial proportion of its C17 fabric and C19 historic fabric; * for the C17 survival of good quality, well-crafted materials and features including the stone quoins and brickwork to the exterior, and the inglenook fireplace, chamfered beams, substantial main stack, a vestigial window architrave and the majority of the roof structure to the interior; * for the evidence of the former lobby entrance plan, with intact winder staircase east of the stack; * for the C19 survival of architectural detail including canted bay windows, the C19 main stairs, panelled and plank doors and a fireplace to the dining room. Historic interest: * for its location within the park of Bishops Waltham Palace and its role in farming the estate from the C17. Group value: * it possesses historical and functional group value with Bishops Waltham Palace, a Scheduled Monument;
>
> * with the granary to the north-west of the farmhouse (recommended for listing at Grade II)*"*.

On the basis of the above and the HEDBA, it is considered that the likely harm to the setting of the two Grade II listed buildings is less than substantial and minor in nature. This harm is clearly outweighed by the substantial public benefits of the proposals in terms of Paragraph 202 of the NPPF.

The objector states that "LPP2 makes specific mention of the Deer Park as of 'national significance' and stresses the need to avoid any adverse impact on it and its setting".

Paragraph 4.2.17 of LPP2 notes the deer park however it draws specific attention to the Park Lug, which enclosed the park. 4.2.17 states that "where it survives well, the Park Lug may be considered to

[4] https://historicengland.org.uk/listing/the-list/list-entry/1477869?section=official-list-entry

be of national importance". This is at odds with the objector's comments which insinuate that LPP2 states that the deer park as a whole is of national importance.

Nonetheless, it is appreciated that the impact on the deer park must be taken into account, and it is taken into account in the HEDBA and the additional comments in this letter.

The objector's comments state that LPP2 "stresses the need to avoid any adverse impact on it and its setting". This is not totally accurate, as the end of Paragraph 4.2.17 states that the potential impact on the setting of the deer park needs to "ensure any adverse impacts can be avoided or minimised through suitable mitigation" (emphasis added). This is quite different to 'avoid any adverse impact' and reflects the actual content of the relevant policies, against which the development is assessed in Section 9.5 of the PDAS. This full assessment is not repeated here for brevity, but I would highlight that the proposals comply with Policy CP12, which supports renewable energy developments, as the impact on heritage assets and their setting have been taken into account (alongside the other material considerations mentioned in this key policy).

The Lug is partially visible on the ground and on the Ordnance Survey. For example, the Allen King Way to the site's north-east seems to run along the Park Lug, as it passes by the north-east boundary of the adjacent, operational solar farm. This indicates that general suitability of low lying, well screened developments adjacent to the Lug. In this case, the proposed development is not adjacent to or near the application site.

There are three further references to the deer park in LPP2. These relate to the potential impact of three allocations on the fringe of Bishop's Waltham (BW1, BW2 and BW4) on the deer park. The location of these allocations in proximity to the Park Lug indicates that development in the deer park and near the Lug can be delivered without inappropriate harm to the historic environment.

Fire and Safety Issues

The comments from Hampshire & Isle of Wight Fire & Rescue Service (the Fire Service) are noted and are responded to in the following comments. Comments are also noted from an objector who has submitted the incident report from a BESS fire in Liverpool.

In terms of the comments from the Fire Service, access to the proposed development is considered generally suitable, including the proposed bridge, on the basis that it can accommodate construction vehicles including heavy inverters etc. There will be no tall buildings (in terms of the comments on high reach appliances). Any relevant building regulations will be complied with in due course, although this is not in the remit of the planning process.

The development will be regularly visited, and constantly automatically monitored by off-site staff and systems, to ensure it is operating safely and in line with the relevant regulations and safety parameters, including performance and temperature indicators. The monitoring system will automatically turn off the BESS element of the development in the event of a problem. This is most likely to be through an 'off-gas' detection system, which detects the gases/vapours produced during the earliest stage of a potential failure.

This is linked to the BESS management system, which would shut down the failing element and instigate the fire suppression system as need be. Such systems are already widely used, for example in datacentres. One potential supplier has advised the applicant that each container of batteries will have c. 5,000 sensors installed as part of their system, to rapidly identify any issues or problems.

All systems will be justified, tested and shown to be working as designed as part of the commissioning process and their effectiveness will be regularly checked during operation, as noted above.

There will be no timber framed buildings on the site.

In terms of the objection comment including the content on the report on the fire in Merseyside, the following comments are made.

The report and the objection are largely factual, and each case must be considered on its own merits. Furthermore, it is clear and obvious that battery fires attract attention but represent a tiny proportion of millions of batteries and BESS systems operating without issue in dwellings, hospitals, data centres, solar farms and as standalone systems.

Planning policy and guidance does not prevent the development of BESS. Indeed, it encourages and supports such developments as part of decarbonising the electricity grid. As noted above, BESS are already used in sensitive locations such as hospitals and in private dwellings.

Paragraph 174 (e) of the NPPF advises that planning decisions should prevent new development from contributing to unacceptable levels of soil, air or water pollution.

The PPG advises that when the impact of a development proposal on water quality is a significant concern, the potential impacts and mitigation measures should be provided. It goes on to state "Where it is likely that a proposal would have a significant adverse impact on water quality then a more detailed assessment will be required. The assessment should form part of the environmental statement, if one is required because of a likely significant effect on water". In this case, suitable details have been provided and a "more detailed assessment" is not required, as this is not an EIA development and significant adverse impacts are not anticipated.

It is established that an overlap between planning and other consenting and protection regimes is to be avoided. With this in mind, the day to day management of health and safety is not a material consideration. The minimisation of risk through careful mitigation can be incorporated into the planning approval process, along the lines of the details supplier herein.

Similarly, the day to day operation of safety systems is not a material consideration. Rather, it is a case of understanding the systems that can be put in place, and ensuring that there is a satisfactory and reasonable (proportionate) level of planning control. Typically this is through use of planning condition to secure final details as need be, then 'to be retained and operated throughout the operational lifespan of the development' condition, or words to that effect.

It should also be noted that as the BESS (and the connected solar farm) will be connected to the distribution network, a raft of rigorous contractual and safety requirements are placed on the applicant through their grid connection agreement. These relate to safety and security of the grid, and include compliance with bets practice and insurance requirements.

There are a number of lessons to be learned from the report on the Liverpool fire, and improved best practice to be incorporated into developments. In terms of the potential environmental impacts of dealing with a fire, which are raised by an objector, the report on the Liverpool fire notes that:

12. Once water was applied, the resulting run-off contained **Hydrofluoric Acid (HF)** (confirmed by Bureau Veritas) as a product of reaction between the cells and water contact. "Firefighting run-off was low due to the container involved being sited on a gravel base. Run-off was periodically checked for contamination, which was low. Appropriate environmental protection measures were put in place at the earliest opportunity". The run-off was mainly contained to the site.

13. Bureau Veritas (BV) scientific advisers identified the potential for the **smoke plume** to contain HF and **Hydrochloric Acids (HCl)** as a product of burning lithium cells, however, the dilution rate within the plume deemed the concentration as negligible.

Carnegie Road BESS Fire Significant Incident Report, Summary and Key Learning

The key points here are that the run off from fire fighting was minimal and that the plume concentration was negligible. The report also notes that acidity from run off was minimal. The fire was in an urban area however nearby buildings do not seem to have been affected. The fire was brought under control in approximately five hours.

Nearby principle sensitive receptors for the proposed BESS are considered to be the groundwater system, nearby habitats such as trees and hedges, the watercourse to the north and dwellings, the closest of which is c. 250m away.

The site is not located in a Drinking Water Protected Area / Safeguard Zone or Source Protection Zone. The local plan states that "These zones exist to protect public drinking water supplies and suitable pollution prevention measures are focused in these areas".

Nearby habitats such as trees and hedges are unlikely to be substantially affected in the event of a fire as it would be contained to the BESS area.

It seems unlikely that the watercourse to the north would be affected as a result of the distance from the BESS to the watercourse and the low levels of run off, based on the experience from Liverpool. The BESS is also enclosed in a three metre high acoustic barrier, which will limit run off in the event of a fire, and contain any debris etc.

Policy CP17 supports development which "does not cause unacceptable deterioration to water quality or have an unacceptable impact on water quantity (including drinking water supplies) by: protecting surface water and groundwater through suitable pollution prevention measures".

In conclusion, it is noted that BESS are supported in principle by planning policy. Safety and environmental issues (including environmental impacts during an incident) are important issues which are not taken lightly by the applicant. The information provided as well as the ability to provide detailed systems information to discharge a planning condition is considered suitable for the purposes of planning decision making.

The further details of these control and protection measures, as well as their maintenance and management, can be secured through condition. This can include measures regarding environmental protection both in terms of day to day operation and in the event of an incident and the response to that incident. For example:

> "Construction of the battery energy storage system shall not commence until a Risk Prevention & Fire Safety Management Plan including Environmental Management and Protection details, which sets out the design and mitigation measures in place to prevent, detect, suppress and mitigate any potential fire risk at the energy storage facility should be submitted to and approved by the LPA".

Securing one operational document through condition will pull together the various strands noted above, and incorporate specific contractor feedback to ensure the protection measures have the 'buy in' of key project stakeholders. This will include consultation with relevant consultees including the Fire Service. It can also reflect on the learning points set out in the report on the Liverpool fire, such as the use of gravel soakaways and ensuring the ease of accessibility to technical information for fire fighters and 'Site Specific Risk Information' on site.

New Permissive Path

As noted above in the section on community engagement, at the suggestion of the local ramblers group, a new permissive footpath is proposed along the alignment of the proposed access track. This will improve the PROW network in the area, by improving the connection between the PROW which passes through the farm yard to the PROW to the west, which leads towards the Pilgrim's Trail.

This reduces the length of time users would spend on / adjacent to Botley Road, and avoids walkers having to 'double back' along Botley Road.

In terms of potential impacts from this route, the route would not be opened until construction had been completed. As such, there would be no impact during construction.

During operation, the solar farm would be partially visible when travelling southwards from the road towards the site. The view would be oblique and in the context of the existing large pylons near the route. This is considered a minor impact overall and clearly outweighed by the benefits of the proposed development and the improvement to the PROW network.

The new route may result in a view towards the location of Grade II listed farmhouse and granary, with the proposals located further south again. However, these listed buildings are well screened, would be seen in the context of the modern farmyard buildings and other detracting elements in the immediate and wider landscape including electricity pylons. As such, and noting that this is would be a newly created view as part of PROW enhancements, it is considered that the potential harm would be less than substantial, very minor in nature and clearly outweighed by the benefits of the proposals.

Overall, the proposed permissive path is considered a substantial additional benefit of the development and the agreement of the necessary documentation could be secured through use of a pre-occupation planning condition, as the path lies entirely within the application boundary.

Closure

To conclude, it is considered that the comments raised to date by consultees and third parties have been appropriately responded to.

This has included changes to the development, primarily in terms of the inverter technology, moving the substation and BESS southwards to reduce noise impacts and reducing the hedgerow removal at the access point from c. 130m to c. 40m.

A range of clarifications and justifications are set out above and in the enclosed amended information.

The development will deliver substantial benefits, especially in terms of:

- Substantial contribution to;
  - tackling climate change;
  - improving energy security;
- Substantial BNG;
- New permissive path improving connectivity in and around the site; and
- Economic benefits.

Emerging national policy makes it clear that local renewable energy developments play a key role in decarbonising the country's energy supply and reducing reliance on external sources of energy.

The ESS was published in April 2022 and makes it clear that a major 'ramp up' in the deployment of ground mounted solar capacity is required.

The proposed development complies with the development plan, as well as other relevant policy and guidance, when considered on balance and as a whole.

I trust the above and enclosed is clear, addresses the comments raised to date and that the application can be determined on this basis.

Yours sincerely,

[redacted]

James Jamieson MRTPI
Planning & Development Manager

[redacted]

Encl: Solar Farm Layout with BESS (Rev E7, 21/03/2022)
Noise Impact Assessment (Rev 2, 31 January 2022)
Location plan (14/3/2022)
Biodiversity Management Plan (April 2022)
Biodiversity Metric 3.0
Historic Environment Desk Based Assessment (Rev 02a, March 2022)
Revised SuDS layout dated 22.03.22 (Appendix B in otherwise unchanged FRA)
Landscape Masterplan (Rev C, 24/03/2022)
ITMP (Rev B, 30/03/2022)