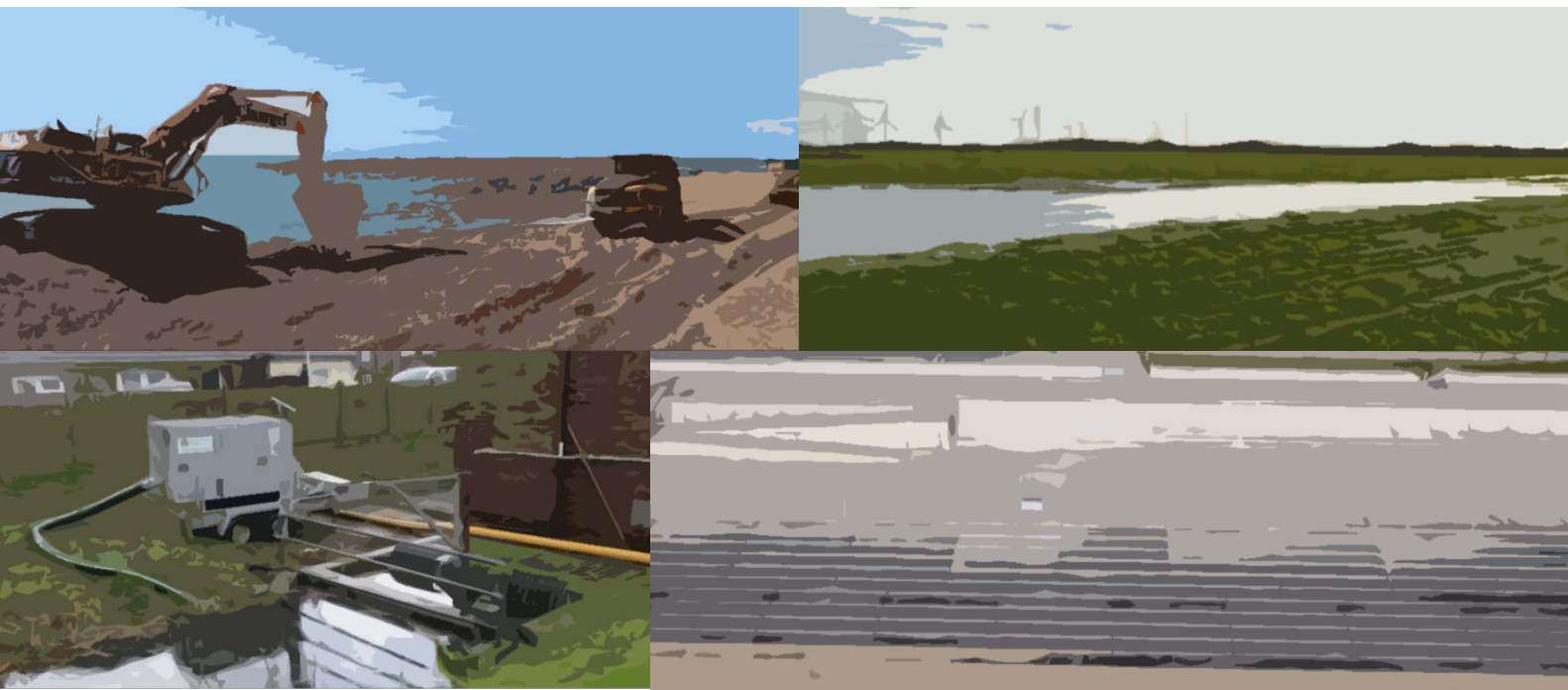


PLANNING, DESIGN & ACCESS STATEMENT

GROUND MOUNTED SOLAR ARRAY ON LAND NEAR ROMNEY, KENT



March 2025



ENVIROMENA

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*“The planning system should **support the transition to a low carbon future** in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to **radical reductions in greenhouse gas emissions**, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and **support renewable and low carbon energy** and associated infrastructure.”*
(NPPF161)

“When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should:
*a) **not require applicants to demonstrate the overall need** for renewable or low carbon energy, and **give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future;***
*b) **recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions [...]**”*
(NPPF 168)

*“Significant volumes of projects need to pass through the planning system to start construction on rapid timescales, while maintaining community consent which is vital to the mission. **Given that construction for many of the required projects needs to begin in the next 6-24 months to be in place by 2030**”*

*“The Government’s clean power mission must be about delivery. Clean power by 2030 is a huge challenge that **will only be met by doing things differently**, by prioritising pace over perfection”*
(Clean Power 2030, NESO October 2024)

Statement Revision and Issue Date	Report Author	Position	Signed off by	Position
Rev 1 March 2025	Steven Bainbridge BSc MSc MRTPI	Head of Planning	Mark Harding	European Development Director

1. Introduction

1.1 This Planning, Design and Access Statement (PDAS) is submitted by Enviromena (the Applicant) in support of our planning application for a 16MW solar array near Romney, Kent.

1.2 The description of development is:

“Construction of a solar farm, to include the installation of solar photovoltaic panels to generate electricity, with ancillary substations, inverters, perimeter stock fencing, CCTV, access tracks, landscaping and other associated works”.

1.3 Enviromena is a clean energy company providing safe, affordable, and reliable solutions for growing sustainable power demands. Headquartered in the UK, it is a trusted renewable energy partner with a strong track record of more than 15 years’ global experience in constructing, managing, and operating ground-breaking renewable energy projects. The company has built in excess of 730MW globally and has over 2GW of projects in construction and development across the UK and Europe.

1.4 Enviromena is committed to ensuring that they leave the communities and places that they touch in better condition than when they arrived and is committed to making a positive and significant impact on the causes of climate change and delivering environmental improvements.

1.5 Solar power, as a form of renewable energy, is clearly supported by national and local government and is a well-established and well understood technology type. Where developments require Environmental Impact Assessment (EIA) then the Planning Practice Guidance (PPG) is clear that the key issue is “any visual impact”, as distinct to wind and hydro power where key issues also include “scale of the development, noise and ecology”. In all cases Local Planning Authorities (LPAs) have their own guidance for solar developments and typically require a range of reports and surveys, which in this case includes; archaeology, arboricultural survey, agricultural land survey, biodiversity net gain report, ecology surveys, flood risk and drainage report, glint and glare assessment, heritage report, landscape and visual impact assessment and transport statement.

1.6 Crucially, this proposal has a ‘point of connection’ to the national grid, a benefit which, in a very practical sense, weighs significantly in favour of approval.

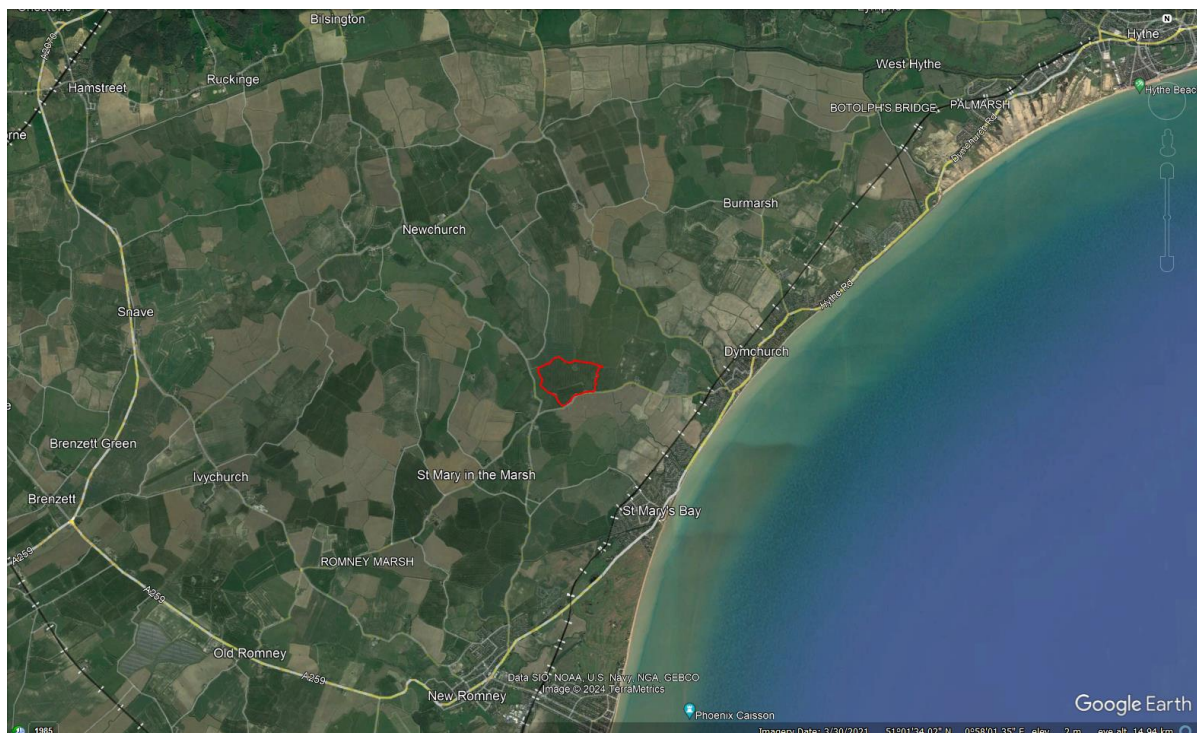
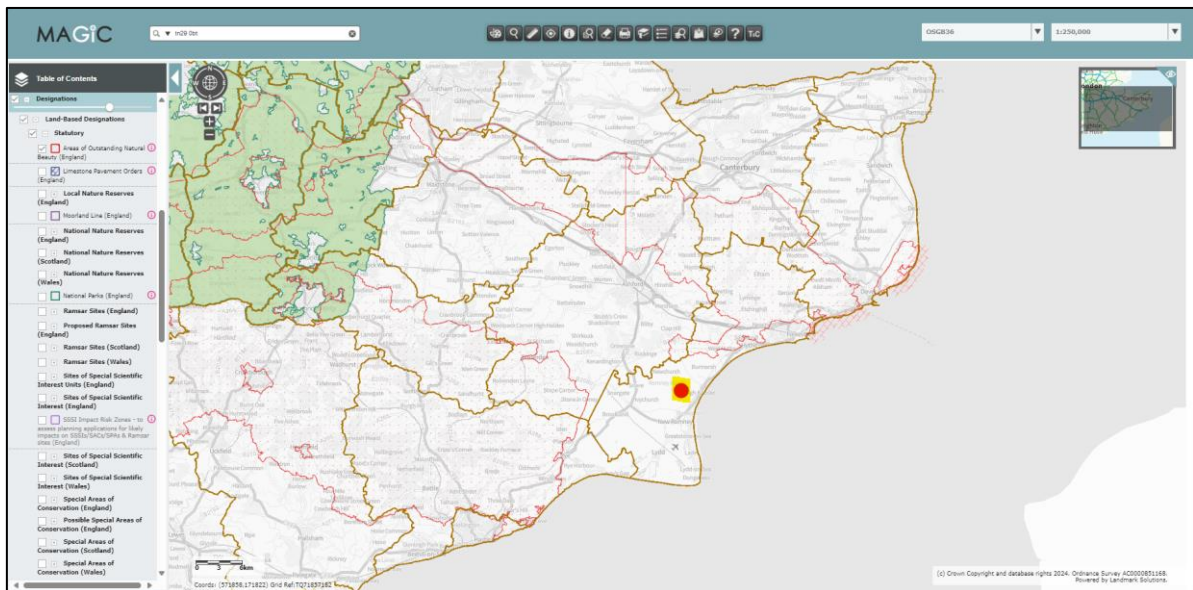
1.7 The Main Issues in this planning application include the following:

- Compliance with the development plan (Folkestone and Hythe (F&H) Core Strategy Review 2022 and Places and Policies Local Plan 2020).
- The influence of material considerations on the compliance or otherwise with the development plan.
- Consideration of the imposition of planning controls where necessary, in order to allow the proposals to move forwards.

1.8 The F&H Local Plan provides the policy framework within which this proposal has been prepared. From that exercise we are content that our planning application satisfactorily assesses all potentially adverse impacts, maximises mitigation and minimises impacts, leaving the benefits clearly outweighing any residual effects.

2. Site Location and Description

2.1 Our proposed solar farm is located in Kent, west of Dymchurch and northwest of St. Mary's Bay:



2.2 The site is located in the Romney Marsh Landscape Character Area, and then the Landscape Character Area 1: Romney Marsh Proper Farmlands, where one of the “forces for change” includes:

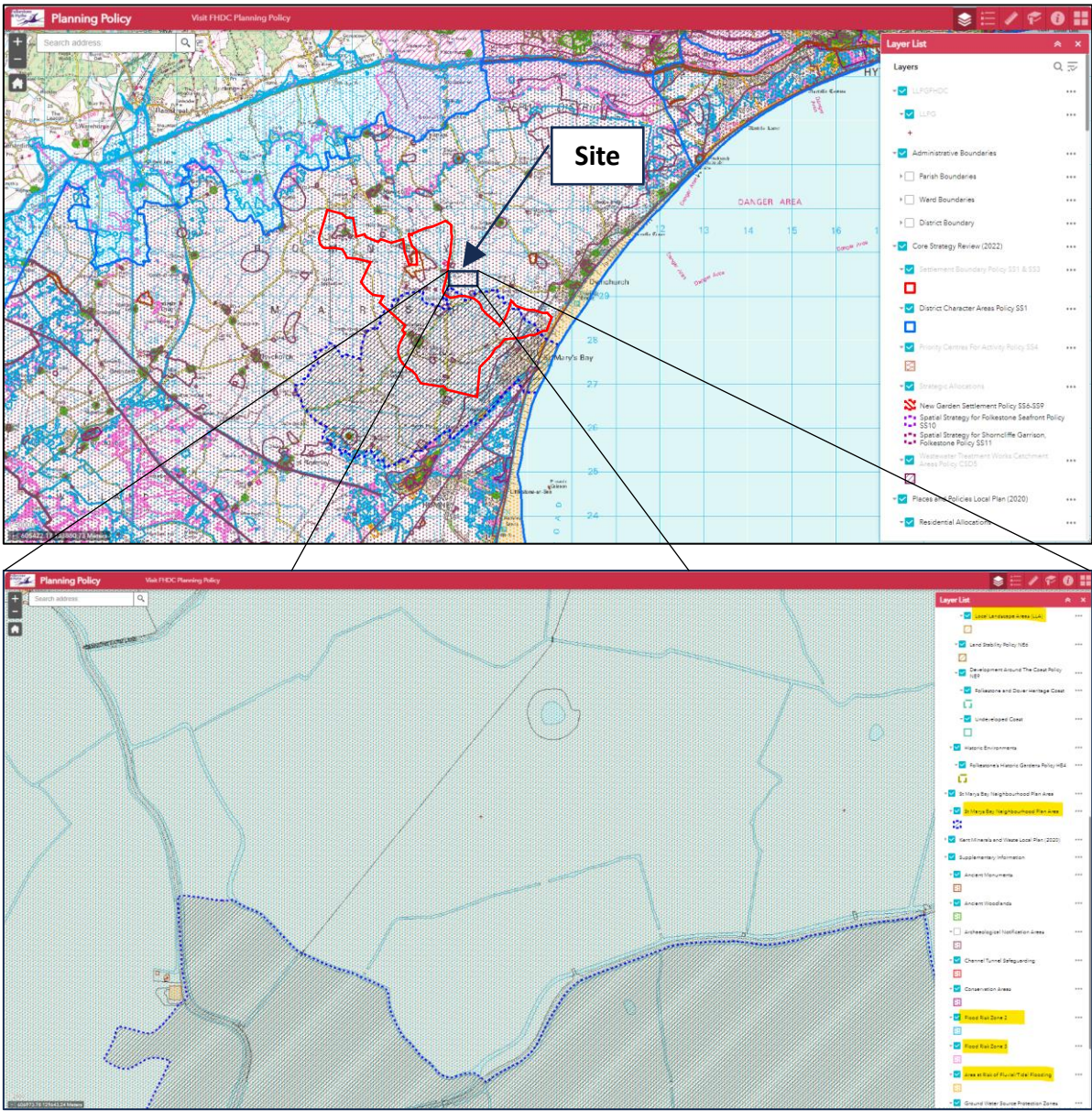
“Climate change is likely to result in sea-level rise and a greater frequency and intensity of storm events, making flooding of the area more likely. It may also affect crop choices, the seasonal cycle of farming, and the presence of tree pests and diseases, all of which will affect the landscape”.

2.3 Footpath HM154 crosses the site from southwest to north.

2.4 Magic Map categorises the agricultural land classification as either Grade 1 or 2 so it is

likely to be the higher 'best and most versatile' quality land. The results of our agricultural land quality assessment are set out below.

2.5 The site is relatively undesignated. The F&H online mapping shows other designations in the wider area:



2.6 The site is affected or otherwise by the following planning, environmental and heritage designations:

Designation	On site	Near 1km	(within 1km)	Distant (between 1km and 5km)
Landscape				
AONB				
Green belt				
Flood				

FZ1			
FZ2			
FZ3			
Heritage			
Scheduled Monument			
Listed Building			
Conservation Area			
Non-des Assets			
HER results			
Land quality			
BMV			
Public access			
Promoted Route			
Bridleway			
Footpath			
Ecology			
Statutory habitats			
Protected species records			
Local habitats sites			

- 2.7 Access to the site during the construction phase, and then occasionally for maintenance during the operational phase will be from the existing bridged field access onto St. Marys Road. The access will be surfaced and improved for the first 15 metres and the bridge will be improved, to enable safe access on and off the highway, but will otherwise be left in its current state, not requiring any surfacing for us to get our equipment on and off the site.

3. The Proposed Development

- 3.1 Enviromena are proposing to develop a solar farm on our site near Dymchurch. Renewable energy projects like this support the green economy which contributes some 3.8%¹ to the UK economy².
- 3.2 It also supports agricultural diversification, helping UK farmers to balance the ever-complex issues of food production, international price competition, increasing animal welfare & environmental standards and workforce shortages at all levels.
- 3.3 The proposed solar farm will have an approximate capacity of 16MW. The site is c.40 hectares in size.
- 3.4 The solar farm will create enough clean, renewable energy to power approximately 10,600 homes per annum³.
- 3.5 The solar farm would avoid 5,900 tonnes of CO2 being generated per annum from fossil-fuel based energy generation, which is the equivalent of taking 4,200 cars off the road each year⁴.
- 3.6 The land is currently in agricultural use. It will remain in pastoral agricultural use.
- 3.7 Contributing to this; the complete removal of the artificial fertilizer load on the land (nutrient loading of land being a well-known issue in Kent).
- 3.8 Also, through biodiversity net gain, the site will contribute far more to local biodiversity than it otherwise would have done for 40 years.
- 3.9 In addition, the 'resting' of the land will mean that when it returns to a fuller range of agricultural uses in the future, it will be of better quality, with higher levels of soil-organic content and improved structure, ready to service the UK population which will have increased in the meantime to somewhere in the region of 75million people^{5,6}.

¹ [Energy & Climate Intelligence Unit | The UK's net zero economy \(eciu.net\)](https://eciu.net/)

² [Low carbon and renewable energy economy, UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/)

³ Enviromena

⁴ Enviromena

⁵ [UK population to hit 70mn faster than expected, says ONS \(ft.com\)](https://ft.com/)

⁶ [United Kingdom population 2024 - StatisticsTimes.com](https://statistics-times.com/)

4. Design and Access Considerations

- 4.1 The following section provides information on design and access and follows the long-established CABE format, because that formulaic approach better suits infrastructure development.
- 4.2 It then goes on to provide further design and access information following the approach set out in Planning Practice Guidance⁷.

CABE approach		
Design	Use	The land will be used for the arrangement of solar arrays in rows. The land is used for arable/pastoral agriculture and when the solar arrays are built, the land can still be used for pastoral farming.
	Amount	There will be around 35,084 individual solar modules in rows spaced around 6.8m apart – this is to balance conflicting issues of efficient use of land and panels shading each other.
	Layout	The solar arrays are laid out within individual fields, the rows of modules are laid out in an east/west alignment, tilted to face south to face the sun.
	Scale	The scale is 16MW over a site area of 26 hectares. The proposed electricity generating capacity of the array is dictated by a number of factors including the ability of the grid to take the power and the output capacity of the current module technology. For the scale of the modules, please see the submitted elevation details.
	Landscaping	Landscaping typically consists of hedgerow reinforcement and grassland habitat enhancement following biodiversity net gain principles.
	Appearance	The appearance of solar panels is not novel and is becoming commonplace in fields and on rooftops. The panels present a dark, slightly reflective surface, atop of a matrix of metal racking.
Access	Vehicular and Transport Links	Access to the site for the construction period will be via an existing field access onto St Mary's Road. The access will require widening and improvement to allow vehicles to access safely during the construction period. The existing bridge will be replaced. Once built, access is required for cleaning and maintenance of the panels only and will be immaterial in terms of frequency.
	Inclusive Access	It is not relevant to provide inclusive access to the site. However, to the degree that the existing footpath is traversable by people of differing abilities; the footpath will remain unaltered, having a neutral outcome for inclusivity.

⁷ Paragraph: 031 Reference ID: 14-031-20140306 Revision date: 06 03 2014

PPG approach	
Explain the design principles and concepts that have been applied to the proposed development	The siting and location of solar farms is dictated by a well-established range of technical, operational and planning requirements. The arrays are designed in order to use land efficiently, whilst following the topography of the land, in a manner that is not self-defeating. Grid Connection Capacity - The DNO must be able to offer a Point of Connection (POC) with capacity to accept the output of the solar park. Finding available capacity is one of the biggest challenges facing renewable energy development. Avoiding Energy loss - Site must be located close to a POC to avoid transmission losses. The greater the distance, the more energy is lost along the way. Locating a site far from a POC is not an efficient use of land; it means there is less energy getting to the grid from the same area, undermining the principles of sustainable development. Route to Connection: There are often technical considerations and land constraints which mean that cable paths cannot follow a linear 'as the crow flies' route. The more convoluted the route the greater financial implications and transmission losses. Land Availability: Site options are heavily restrained by land availability. A willing landowner is a major challenge facing renewable energy development. Environmental Designations: Consideration of proximity to areas subject to ecological designation like SSSI, RAMSAR, LNR, Special Areas of Conservation, and Special Protection Areas. Development in such areas is to be avoided. Planning Policy: Site selection is mindful of national and local planning and environmental policy. This ranges from requirements in the NPPF, Local Plan, and Neighbourhood Plans. Sustainable Development: Must be capable of multifunctional enhancements to support the economic, environmental, and social dimensions of sustainable development. Because of well-known constraints on the structure and integrity of the national electricity grid, there are very few sites where solar farms can be located, when factors such as suitable grid connection, viability and feasibility and environmental designations are considered. Due to the land take required for viable (subsidy-free) commercial-scale solar farms, they usually require an open

	countryside location.
Demonstrate the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account	Following the site selection methodology explained above, the application site was considered a suitable location to propose a solar farm. Key points of appraisal include: Connection to the national grid – the site has the benefit of a direct connection to the National Grid; a key consideration in the assessment of acceptability of solar farms. Availability of land – from an operational perspective the site is free of physical development constraints, it is available for development (the landowner is supportive) and it is capable of accommodating development immediately. Topography and Overshadowing – the land is generally flat, only varying between 1m and 3m AOD across the site. The field boundaries are well-vegetated and the proposed layout reflects this by keeping panels outside of tree-shaded areas. Environmental Designations – The site is not subject to any statutory environmental or heritage designations. Solar gain – the site has good levels of solar irradiation levels.
Explain the applicant's approach to access and how relevant Local Plan policies have been taken into account	Access considerations are limited to the access needs during the construction period, and the immaterial movements associated with subsequent care and maintenance. Enviromena do not need to build on-site roads. The access will require widening and improvement, not least to prevent the discharge of mud onto the road. The site has good road connections for construction and maintenance purposes.
Detail any consultation undertaken in relation to access issues, and how the outcome of this consultation has informed the proposed development	The field access exists and is in a rural location on a relatively narrow width lane (which will serve to reduce speeds). Visibility to the left on exit of 200m or more, and to the right on exit in likely excess of 100m. The Highways Authority will be consulted on the planning application and a construction management plan can be conditioned in order to control vehicle movements and access during the short-term construction period. In this context it is not necessary to consult anyone in advance of the planning application.
Explain how any specific issues which might affect access to the proposed development have been addressed	Footpath HM154 runs through the site. The access will be widened and improved to allow vehicles to enter and leave the site in a safe manner. Sufficient space will be provided to allow safe use of the footpath and access to the site during the short-term construction period.

5. Outcomes of Surveys

- 5.1 To complement our planning application, Enviromena has commissioned the following surveys and assessments. We set out below the conclusions of each, before addressing the proposals performance against the development and material considerations because, development policies frequently include ‘policy tests’ to, for example, avoid significant adverse impact on landscape, and therefore it is important to understand what the qualified experts have said, prior to considering the proposal’s performance against policy requirements.

Archaeology

- 5.2 *“The extent of any further archaeological works will be proportionate to the archaeological potential and will be dependent on the depth of any groundworks for the Proposed Development, if necessary. It may also be possible to avoid impacts on sub-surface archaeological remains by adapting elements of the design.*

Further detail will be provided on design, and in particular the depth of any invasive groundworks at the detailed design phase. However, by their nature, the footprint of solar farms and the amount of ground-breaking that is required is generally limited. Impacts depend on the depth of the archaeological horizon, the depth of ground-breaking, the potential for archaeological remains to be present as well as the state of preservation and the significance. Due to the limited nature of the ground-breaking required, the impact is assessed as being less than substantial in accordance with the NPPF.”

Arboricultural (trees)

- 5.3 *“there are no negative arboricultural impacts caused by the development proposal on trees at the site”*

Agricultural Land Classification

- 5.4 *“All land surveyed as part of this assessment has been identified as **ALC Grade 3b** and as such, no BMV land has been identified on this site”:*

ALC Grade	Area (Ha)	Percentage
Grade 1	0.00	0.00%
Grade 2	0.00	0.00%
Subgrade 3a	0.00	0.00%
Subgrade 3b	37.00	97.40%
Grade 4	0.00	0.00%
Grade 5	0.00	0.00%
Non-Agricultural	1.00	2.60%
Total BMV	0.00	0.00%
Total Non-BMV	38.00	100%
Total Site Area	38.00	100%

Biodiversity

- 5.5 From the preliminary ecological surveys:

- Designated sites – no impacts anticipated
- Habitats and flora – no impacts anticipated
- Amphibians – no impacts anticipated and further surveys disproportionate
- Reptiles – construction inconsequential to populations, but recommendations made for site clearance
- Roosting bats – no impacts, no recommendations
- Foraging and communing bats – no direct impacts, no recommendations
- Badger - construction inconsequential to populations, precautionary working methods recommended
- Dormouse - no impacts, no recommendations
- Hedgehog - construction inconsequential to populations, precautionary working methods recommended
- Otter – no direct impacts, precautionary working methods recommended
- Water voles - no direct impacts, precautionary working methods recommended
- Birds - no direct impacts, site clearance timings recommended
- Invertebrates - no impacts, no recommendations

5.6 From the wintering bird survey:

- Loss of foraging habitat – impacts unlikely
- For skylark – a no-go area is recommended
- Further hedge planting recommended
- Clearance work timing recommended
- Low impact lighting strategy recommended

5.7 From the biodiversity net gain report:

- *“The current proposed plan results in an 80.93% net gain in habitat units, 387.87% net gain in hedgerow units and 28.09% net gain in watercourse units. This is more than the 10% target of biodiversity net gain.*
- *A Biodiversity Net Gain (BNG) Management Plan must be produced for the site. This should include recommendations for the implementation, management and monitoring of the site for at least 30 years to ensure that biodiversity net gain is delivered.”*

Flood Risk and Drainage

- 5.8 *“the proposed development is not at significant flood risk, subject to the recommended flood mitigation strategies being implemented [...] and subject to the mitigation measures proposed, the development could proceed without being subject to significant flood risk. Moreover, the development will not increase flood risk to the wider catchment area subject to suitable management of surface water runoff discharging from the site”.*
- 5.9 *“the proposed solar development will have negligible impact on the post-development surface water runoff rates and volumes”.*

Glint and Glare

- 5.10 *“A high impact is predicted upon road safety for an 800m section of St Marys Road, for which mitigation is required.*

A moderate impact is predicted upon road safety for a 300m section of unidentified road, for which mitigation is recommended.

A moderate impact is predicted upon residential amenity for one dwelling, for which mitigation is recommended.

No significant impacts upon aviation activity associated with Bonnington Airfield, Meadow Farm Airfield, Hamilton Farm Airfield, Harringe Airfield and Lydd Airport. No mitigation is required."

Heritage

- 5.11 *"The assessment concludes that the Site makes a negligible contribution to the settings of the Scheduled Moated Site and Associated Fields 460m North-East of Pickney Bush Farm (1016682) and Moat and Associated Closes at Marshall's Bridge (1017659). Therefore, the Proposed Development will have a negligible impact upon the setting of both monuments, which results in a neutral significant effect in both cases. This is acceptable in National Planning Policy Framework (NPPF) terms."*

Landscape and Visual Impact

- 5.12 *"Whilst there would be some adverse effects on landscape character, these would be confined to the site and its immediate surroundings and would not impact on the character of the wider area to any substantial degree. There would also be some adverse effects on visual receptors located mostly in close proximity to the site. This would include recreational routes, including the footpath running through the site, where users would have a direct view of the proposed development, but this would be short lived and proposed planting will provide screening over time. Beyond the site extents as the mitigation takes effect and the planting on the site grows and matures, these adverse effects would reduce".*

Transport and Access

- 5.13 *"the Development provides an opportunity to provide new, non-carbon energy generating facilities at a location which can be safely accessed by construction and operational vehicles and at which the temporary traffic impacts during construction would be minimal. Traffic management measures can be put in place to reduce or avoid potential residual impacts arising from road traffic during the temporary 28 week construction period. In short:*

The proposals accord with national and local policies relevant to transport,

Safe and suitable access to the Site can be achieved by all modes; and,

The level of traffic associated with the Development will not lead to severe impact to the existing operation and free flow of traffic on the adjoining highway network.

In accordance with paragraph 115 of NPPF, there are therefore no transport or highway reasons why planning permission should be prevented or refused"

6. Development Plan Policy Review

6.1 Planning law is clear that planning applications should be determined against the policies of the development plan unless material considerations dictate otherwise.

6.2 In this case the development plan consists of:

- Core Strategy Review 2022
- Places and Policies Local Plan 2020

6.3 The NPPF is clear on the approach to be taken with strategic and non-strategic policies in decision making:

- *"Strategic policies should set out **an overall strategy** for [...] the provision of [...] energy [...] and planning measures to address climate change mitigation and adaptation" (NPPF 20).*
- *"Plans should make explicit which policies are strategic policies. These should be limited to those **necessary to address the strategic priorities** of the area (and any relevant cross-boundary issues), to provide **a clear starting point** for any non-strategic policies that are needed. Strategic policies should **not extend to detailed matters** that are more appropriately dealt with through neighbourhood plans or other non-strategic policies" (NPPF 21).*
- *"Non-strategic policies should be used by local planning authorities and communities to set out more **detailed policies** for specific areas, neighbourhoods or **types of development**. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies" (NPPF 28).*

6.4 The development plan states the following in relation to climate change:

"2.38 The district's particularly fragile relationship with its water environment is becoming increasingly significant, especially with the impact of climate change. This is an important issue for the very low-lying land in Romney Marsh where flood risks and the maintenance of coastal defences have long been a concern"

6.5 The issues associated with climate change are well publicised globally, and locally. Each image below links to a climate related news article:



Europe



India



Africa



Australia



6.6 In a recent planning committee report⁸, the Council has been very clear that:

*“There is a **demonstrable and overarching policy drive** from both planning and other legislative documents to **deliver renewable energy on an increasingly larger scale as a matter of principle**. Furthermore, the **urgency by which this needs to be delivered should be given weight in the decision-making process** and any adverse impacts of the development must be considered against this comprehensive and pressing need to deliver energy capacity in the form of renewable sources. Accordingly, my recommendation is that the Local Planning Authority does not raise objection to the proposal as a matter of fundamental principle.”*

6.7 The following policies of the development plan may be relevant to decision making and are assessed for the proposal’s **conflict** or **compliance** with the relevant policy tests below.

- Strategic Policy SS1 District Spatial Strategy
- Strategic Policy SS3 Place-shaping and Sustainable Settlements Strategy
- Strategic Policy CSD3 Rural and Tourism Development
- Strategic Policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation
- Non-strategic Policy HB1 Quality Places Through Design
- Non-strategic Policy NE2 Biodiversity
- Non-strategic Policy NE3 Protecting the District’s Landscapes and Countryside
- Non-strategic Policy NE5 Light Pollution and External Illumination
- Non-strategic Policy CC3 Sustainable Drainage Systems
- Non-strategic Policy CC6 Solar Farms
- Non-strategic Policy HE2 Archaeology
- Non-strategic Policy E6 Farm Diversification

6.8 **Strategic Policy SS1** sets the district’s spatial strategy and focusses on housing and employment development, and is therefore of little relevance to decision making on a ground-mounted solar farm. However, the policy concludes by stating that:

“In all locations throughout the district, development should be designed to directly contribute to the sense of place and sustainable design as set out in policy SS3”.

6.9 The requirement to contribute to the sense of place must be regarded in the context of NPS EN1 (which is a material consideration in s78 planning applications for renewable energy) which says:

*“The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. **The functionality of an object** – be it a building or other type of infrastructure – **including fitness for purpose and sustainability, is equally important.**”*

⁸ <https://folkestone-hythe.moderngov.co.uk/documents/s46815/3.%2023.0580.FH%20-%20Pent%20Farm%20Solar%20Farm%20-%20FINAL.pdf>

*Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that **the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area***’.

- 6.10 Our planning application complies with policy SS1, in as far as it is relevant or useful to decision making.
- 6.11 **Strategic Policy SS3** is the council’s ‘place shaping’ policy. Assessment of this application against policy SS3 must be held in the context of the advice in NPS EN1 set out above.
- 6.12 The policy requires development to be directed towards settlements in conjunction with the settlement hierarchy – that requirement is incompatible with ground-mounted solar schemes.
- 6.13 The policy states that “*all developments must also meet*” a range of requirements, to which we respond below:
- a. the requirement to be proportionate to a serving settlement is not relevant.
 - b. a flood risk assessment has been provided and its conclusions are set out above.
 - c. a design led approach that follows the advice in NPS EN1 has been taken.
 - d. the proposals were designed to contribute to local place shaping “as far as possible” and “acknowledging that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area” (NPS en1 para 4.7.2). The heritage assessment is clear that heritages assets have been preserved.
 - e. the requirement to address social and economic needs is not relevant.
- 6.14 Our planning application complies with policy SS3, in as far as it is relevant or useful to decision making.
- 6.15 **Strategic Policy CSD3** concerns rural and tourism development. Renewable energy is not included and therefore the policy is of very limited use in decision making. It includes sustainable rural diversification as a development type that development outside of the settlements will be acceptable in principle for. Solar schemes are a form of rural diversification, and the NPPF is very clear on the support that should be given in this respect.
- 6.16 **Strategic Policy CSD4** concerns green infrastructure. It states that the Council will require “*development proposals over their lifetime [...] i. development proposals over their lifetime [...] ii protect and enhance valued landscapes [...] So far as possible, to deliver improvements in green infrastructure*”.
- 6.17 This scheme delivers extensive BNG, protects the landscape “as far as possible” (NPS EN1) and the legacy of the landscape planting and mitigation will deliver improvement sin green infrastructure during and after the development.
- 6.18 **Policy E6** covers farm diversification. Ground-mounted solar is a form of farm diversification. The proposal is compatible with the location, in so far as is reasonable, in the context of the advice in the NPSs.

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- 6.19 Ground-mounted solar farms, by their nature, are developed in rural areas. The submitted reports and surveys confirm that, within reason, there would be no detrimental impact on amenity, character or appearance of the rural landscape. Provision has been made for access and parking within the site. In as far as the policy is relevant to renewable energy schemes, the proposal complies with relevant criteria.
- 6.20 **Policy HB1** concerns quality places through design. It is a policy clearly written to guide housing and commercial development. It sets six criteria against which development will be approved. Any local plan policy dealing with design, character and appearance must be applied to ground-mounted solar scheme in the context of the advice in NPS EN1 and EN3.
- 6.21 Criterion 1 requires development to make a positive contribution to location and surroundings. NPS EN1 states that: *"Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area"*.
- 6.22 In the context of NPS EN1 and EN3, this criterion is complied with.
- 6.23 Criterion 2 and 3 are not relevant to ground-mounted solar.
- 6.24 Criterion 4 concerns residential amenity and the glint and glare report is clear on the mitigation required to safeguard the sole affected dwelling.
- 6.25 Criterion 5 is partly relevant. The scheme incorporates high quality landscaping.
- 6.26 Criterion 6 is partly relevant. The scheme complies with other **relevant** policies. It is not reasonable to require a ground-mounted solar scheme to reflect town design statements.
- 6.27 In the context of NPS EN1 and EN3, this policy is complied with.
- 6.28 **Policy NE2** concerns biodiversity. It states:
- *"Development must not result in significant adverse effects on these internationally important nature conservation sites"*
 - *"where developments may have a significant impact, an ecological impact assessment will be required"*
 - *"Local sites [...] will be safeguarded from development"*
- 6.29 The various ecology surveys and reports make clear that no European sites will be impacted. The PEA was clear that no significant impacts are anticipated. The BNG report is clear in the significant uplift in biodiversity that the development will leave as a legacy to the local area.
- 6.30 The policy goes on to state:
- "All new development will be required to conserve and enhance the natural environment [...] The Council will support development that [...] Enhances [...] features of nature conservation value [...] Does not reduce, and where feasible, improves species' ability to move through the environment [...] Incorporates features that enhance biodiversity"*.
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- 6.31 The BNG scores demonstrate that biodiversity will be substantially enhanced, in compliance with the policy.
- 6.32 **Policy NE3** protects the district's landscapes and countryside. The sections on AONB and SLA are not relevant to this scheme, because it is not within or near to those areas.
- 6.33 The policy lists local landscape areas, including Romney Marsh.
- 6.34 The policy states that *"Proposals should protect or enhance the landscape character and functioning of Local Landscape Areas. The Council will not permit development proposals that are inconsistent with this objective, unless the need to secure economic and social wellbeing outweighs the need to protect the area's local landscape importance"* and that in landscape character areas *"Proposals should demonstrate that their siting and design are compatible with the pattern of natural and man-made features of the Landscape Character Areas, including their cultural and historical associations"*.
- 6.35 In the context of the advice in the NPSs, the submitted LVIA is clear that the scheme applies good design, sensitive to place, matched by an appearance that demonstrates good aesthetic as far as possible, in compliance with the policy as far as is reasonably possible.
- 6.36 **Policy NE5** concerns light pollution. Following the construction period, the scheme will have very minimal, motion activated security lighting and will therefore be non-illuminated for the vast majority of the time. By not materially altering light levels, it will comply with the policy and planning conditions can be applied to ensure this.
- 6.37 **Policy CC3** relates to sustainable drainage. It states that surface water will be managed close to its source, SuDS features are commensurate with the design of the development and that climate change is taken into account.
- 6.38 The submitted flood risk assessment and drainage strategy are clear on their positive performance against these requirements, in compliance with the policy.
- 6.39 **Policy CC6** concerns solar farms. It is the most relevant policy in this case. It sets 10 criteria against which solar farms will be permitted. We respond to those criteria in turn:
- 1. The first criterion sets a high and unreasonable bar and does not say at what stage in the development's lifespan the policy test of "not adverse" bites. Nevertheless, the LVIA is clear that *"There would also be some adverse effects on visual receptors located mostly in close proximity to the site. This would include recreational routes, including the footpath running through the site, where users would have a direct view of the proposed development, but this would be short lived and proposed planting will provide screening over time. Beyond the site extents as the mitigation takes effect and the planting on the site grows and matures, these adverse effects would reduce"*.
 - 2. The glint and glare report is clear on the mitigation required to prevent amenity impacts to the sole affected dwelling.
 - 3. Ancillary buildings are to an operational minimum.
 - 4. The ecology reports are clear that, far from there being no adverse ecology impacts, that BNG will be boosted substantially.
 - 5. The landscape and screening strategy is suitable.
 - 6. The panels and frames are in standard colour accepted far and wide and the LVIA

is clear on the visual outcomes.

- 7. The solar panels will be removed when no longer operational, and a 'clear away' planning condition can be applied to ensure this.
- 8. Details are provided for security measures.
- 9. The installed capacity will be approximately 24.2MW DC and 16MW AC.
- 10. The scheme will not result in the loss of BMV land.

6.40 Whilst the policy is not entirely positively framed (counter to NPPF paragraph 165a), the scheme complies with its requirements.

6.41 **Policy HE2** concerns archaeology.

6.42 NPPF paragraph 207 is clear that *"As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation"*.

6.43 The submitted archaeological report is clear that "Due to the limited nature of the ground-breaking required, the impact is assessed as being less than substantial in accordance with the NPPF".

6.44 NPPF paragraph 56 is clear that "Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions".

6.45 If the Council's archaeological officer considers any further investigation and evaluation is reasonably necessary, then it can be conditioned.

6.46 We are content that, within reason, and within the context of specific advice in the NPSs, that our planning application complies with the development plan, and any apparent conflicts are understandable and not lethal.

7. Planning Conditions

7.1 The NPPF is clear that:

"56. Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

57. Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects".

- 7.2 Our consultants have recommended mitigation where necessary that can be controlled by planning condition.
- 7.3 We look forward to discussing potential planning conditions with the local planning authority early in the process (NPPF paragraph 57).

8. Material Considerations

8.1 We have grouped the national and local material considerations under the following general headings, although some references may well fit under more than one:

- Energy policy / energy security
- Climate change & net zero
- Landscape
- Biodiversity
- Heritage
- Economic development

Energy Policy & Energy Security

Planning Practice Guidance

8.2 In March 2014, the Government published its online Planning Practice Guidance ('PPG'). This web-based resource brings together planning guidance on various topics including renewable and low carbon energy.

8.3 PPG Paragraph 001 (Reference ID: 5-001-20140306) sets out why planning for renewable and low-carbon energy is important. It advises:

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

8.4 PPG paragraph: 010 (reference ID: 5-010-20140306) states renewable energy developments should be acceptable for their proposed location. Along with factors applicable to acceptability for any form of renewable energy development, there are considerations for each technology.

8.5 PPG paragraph 013 (Reference ID: 5 – 013 – 20150327) states that the visual impact of a well-planned and well-screened solar park can be properly addressed within the landscape if planned sensitively. Factors include:

"Encouraging the effective use of land by focusing large scale solar parks on previously developed and non-agricultural land, if 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 parks 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 parks on such assets. Depending on their scale, design and prominence, a large-scale solar park 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 several reasons including, latitude and aspect."*

8.6 Paragraph: 013 goes on to state:

"The approach to assessing cumulative landscape and visual impact of large-scale solar parks is likely to be the same as assessing the impact of wind turbines. However, in the case of ground mounted solar panels it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero".

British Energy Security Strategy (April 2022)

- 8.7 The British Energy Security Strategy (BESS) sets out how the UK intends to secure clean and affordable energy for the 'long-term'. Realising the strategy requires 70GW of solar generation capacity by 2035. This is a significant increase from the 13.7GW of solar as of February 2022.
- 8.8 Over the last five-year period until the publication of the BESS, the UK increased its solar capacity by only an estimated 1.8GW, highlighting the extraordinary need for a significant increase in the deployment of decentralised solar energy schemes of the proposed Development's scale if the BESS targets are to be met. The BESS offers clear support for solar development that is co-located with other functions to maximise the efficiency of land use – this includes dual solar and agricultural land use.

Energy Security Bill (July 2022)

- 8.9 The Energy Security Bill builds upon the British Energy Security Strategy to invest in homegrown energy and maintain the diversity and resilience of the UK's energy supply. The Bill establishes the need to accelerate the growth of low-carbon technologies.

Powering up Britain: Main Summary, Net Zero Growth Plan and Energy Security Plan (March 2023)

- 8.10 As part of 'Energy Security Day', in March 2023 the Government released a suite of documents mapping out their proposals to strengthen energy security and independence as part of the UK's mission to achieve net zero by 2050.
- 8.11 The plans strongly recognise the importance of solar deployment at all scales in

decarbonising the power sector, achieving UK energy security and delivering net zero more widely. The Government's commitment to quintuple solar generation to 70GW by 2035 is re-stated and supported through a 'solar taskforce', designed to further enable the delivery of the solar target and publish a solar roadmap in 2024.

- 8.12 The net-zero growth and energy security plans reaffirm previous ministerial commitments that agricultural land classification will not be changed. Support for ground mounted solar is more explicit than in previous Government documentation but with regards to food security states:

"We consider that meeting energy security and climate change goals is urgent and of critical importance to the country and that these goals can be achieved together with maintaining food security for the UK. We encourage deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement."

- 8.13 The PPG is an online Government published resource which is regularly updated and provides guidance on how the NPPF should be interpreted for decision-making purposes.

- 8.14 The relevant aspects of the PPG for the determination of this planning application are considered to be:

- Climate Change;
- Design: process and tools;
- Effective Use of Land;
- Natural Environment;
- Open Space, Sports and Recreation Facilities, Public Rights of Way and Local; and
- Green Spaces.

Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3)

- 8.15 NPPF Paragraph 5 states that National Policy Statements (NPS) 'form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.' As such, NPS for Energy (EN-1) and the NPS for Renewable Energy Infrastructure (EN-3) are part of national planning policy and are material considerations in the determination of this application.

- 8.16 The updated NPS EN-1 was published in November 2023 and sets out the UK Government's commitment to increasing renewable generation capacity. Paragraph 1.2.1 confirms that "In England and Wales this NPS is likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)".

- 8.17 Paragraph 2.1.2 states that to produce enough energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. It highlights that high quality energy infrastructure is crucial for economic growth, boosting productivity and competitiveness. Paragraph 2.3.6 goes on to state that we need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This is to be achieved by increasing domestic supply of clean energy from

renewables, nuclear and hydrogen.

8.18 Paragraph 4.1.7 of NPS EN1 reads as:

"4.1.7 Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk".

8.19 Enviromena are mindful that it is necessary to have regard to other paragraphs of EN1 in order to better establish that low carbon development is capable of benefitting from "the need case outweigh[ing] the residual effects in all but the most exceptional cases".

8.20 Paragraph 4.2.4 and 4.2.5 of EN 1 state:

- *"4.2.4 Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.*
- *4.2.5 This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. Low carbon infrastructure for the purposes of this policy means: • for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion".*
- Other contextual paragraphs from EN1 include:
- *"1.1.1 This National Policy Statement (NPS) sets out national policy for the energy infrastructure described in Section 1.3 below. Part 1 of this NPS sets out the background context to the NPSs, including the scope of EN-1 and geographical coverage. Part 2 outlines the policy context for the development of nationally significant energy infrastructure. Part 3 explains the urgent need for significant amounts of large-scale energy infrastructure in meeting government's energy objectives. Part 4 sets out the general policies for the submission and assessment of energy infrastructure applications. Part 5 outlines generic impacts which arise from the development of all types of energy infrastructure covered by the energy NPSs."*
- *"1.2.1 In England, this NPS, in combination with any relevant technology specific NPSs, may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)."*
- *"2.3.4 Meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level."*
- *"4.1.1 This part of EN-1, Assessment Principles, sets out the general policies for the submission and assessment of applications relating to energy infrastructure".*

8.21 Section 4.7 provides criteria for good design for energy infrastructure which is useful in

the interpretation of local plan policies on design and built form, which often predicate towards residential and commercial development:

"4.7 Criteria for good design for Energy Infrastructure

*4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design **goes far beyond aesthetic considerations. The functionality of an object** – be it a building or other type of infrastructure – **including fitness for purpose and sustainability, is equally important.***

*4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic **as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.***

4.7.3 Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.

4.7.4 Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle."

- 8.22 The Government acknowledges the contribution community and decentralised energy systems can contribute to the achievement of a decarbonised UK energy system but concludes that micro-generation is insufficient to replace the need for new large-scale electricity infrastructure if energy objectives are to be met. This is because connection of large-scale, centralized electricity generating facilities enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere (Para 3.3.12).
- 8.23 To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity (Para 3.3.3).
- 8.24 If energy demand doubles by 2050, a fourfold increase in low carbon generation will be required accompanied by a significant expansion of the networks that transport power to where it is needed. In addition, the UK has committed that by 2035, all our electricity will come from low carbon sources, whilst meeting a 40-60 per cent increase in electricity demand. This means that most of the new generating capacity needs to be low carbon (Para 3.3.16).

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- 8.25 In this regard it is highlighted 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). A secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (para 3.3.20).
- 8.26 Section 5 of EN-1 acknowledges that the development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative effects on biodiversity, landscape/visual amenity, cultural heritage etc., but that it should be possible to mitigate the most significant potential negative effects.
- 8.27 NPS for Renewable Energy Infrastructure (EN-3) (2023) sits alongside EN-1 and focuses on renewable energy Infrastructure. It begins by reiterating that there is an urgent need for new electricity generating capacity to meet our energy objectives and that electricity generation from renewable sources is an essential element of the transition to net zero (Para 1.1.1-2).
- 8.28 Demand for electricity is likely to increase significantly over likely to more than double by 2050, requiring a fourfold increase in low carbon electricity generation, with most of this to come from renewables (para 1.1.2).
- 8.29 With specific regard to solar PV generation para 2.10.9 sets out the government's commitment to "sustained growth" in solar capacity to ensure net zero targets are achieved. Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation (Para 2.10.13) and can be deployed quickly (Para 2.10.14). As such solar is a "key part of the government's strategy for low-cost decarbonisation of the energy sector"(Para 2.10.9).
- 8.30 Crucially solar is identified as having an important role in delivering greater energy independence with a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW) expected to be delivered (Para 2.10.10).
- 8.31 As such large-scale ground-mount solar deployment across the UK will be required. But sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement (Para 2.10.11).
- 8.32 EN-3 contains a section (2.10) dedicated to solar which details factors that influence site selection by applicants, these are:
- Irradiance and site topography
 - Proximity of a site to dwellings
 - Capacity of a site
 - **Grid connection⁹**
 - Agricultural land classification and land type
 - Accessibility

⁹ See again NPPF paragraph 87 and the requirement that "*Planning decisions should recognise the specific locational requirements of different sectors*".

8.33 Matters to be considered in the decision-making process include (at section 2.10):

- Access tracks;
- Site layout, design, and appearance (including any flood risk);
- Security and lighting;
- Project lifetimes;
- Flexibility (to account for technology types and advancements);
- Biodiversity and nature conservation;
- Landscape, visual and residential amenity;
- Glint and glare;
- Cultural heritage; and
- Construction impacts including traffic and transport noise and vibration.

8.34 It also goes on to state at paragraph 2.10.30 that: ‘the development of ground mounted solar arrays is not prohibited on Best and Most Versatile Land’ or sites designated for their natural beauty, or recognised for ecological or archaeological importance, but the impacts of such are expected to be appropriately considered and at paragraph 2.10.29 that: ‘land type should not be a predominating factor in determining the suitability of the site location’.

8.35 EN3 contains a significant amount of valuable topic-specific information and guidance which decision makers will find is not included in either the NPPF or local plans:

- *“2.3.5 It is for applicants to decide what applications to bring forward.*
- *2.3.6 When considering applications for CNP Infrastructure in sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Registered Parks and Gardens, and World Heritage Sites), the Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure.*
- *2.3.8 In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target.*
- *2.3.9 As most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments).*
- *2.10.9 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 by 2050. As such, solar is a key part of the government’s strategy for low-cost decarbonisation of the energy sector.*
- *2.10.10 Solar also has an important role in delivering the government’s goals for*

greater energy independence. The British Energy Security Strategy⁷⁹ states that government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW). It sets out that government is supportive of solar that is “co-located⁸⁰ with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use”. 2.10.11 The Powering Up Britain: Energy Security Plan⁸¹ states that government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.

- 2.10.13 Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation.
- 2.10.14 Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free.
- 2.10.15 Solar farm proposals are currently likely to consist of solar panel arrays, mounting structures, piles, inverters, transformers and cables.
- 2.10.16 Associated infrastructure may also be proposed and may be treated, on a case by case basis, as associated development, such as energy storage, electrolyzers associated with the production of low carbon hydrogen, or security arrangements (which may encompass flood defences, fencing, lighting and surveillance).
- 2.10.17 Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development will inevitably have impacts, particularly if sited in rural areas.
- 2.10.18 The key considerations involved in the siting of a solar farm are likely to be influenced by factors set out in the following paragraphs, in addition to considerations specific to individual projects.
- 2.10.19 Irradiance will be a key consideration for the applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance of a site will in turn be affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south-facing aspect more likely to increase year-round irradiance levels. This in turn affects the carbon emission savings and the commercial viability of the site.
- 2.10.20 In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel types and aspects, and panel arrays may also follow the movement of the sun in order further to maximise the solar resource.
- 2.10.22 Many solar farms are connected into the local distribution network. The capacity of the local grid network to accept the likely output from a proposed solar

farm is critical to the technical and commercial feasibility of a development proposal.

- *2.10.24 In either case the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal.*
- *2.10.25 To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity.*
- *2.10.27 Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.93-2.10.101) and Glint and Glare (paragraphs 2.10.102 – 2.10.106) impact sections below.*
- *2.10.30 Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 – 92 and 2.10.107 – 2.10.126.*
- *2.10.31 It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.*
- *2.10.32 Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolyzers) to maximise the efficiency of land use.*
- *2.10.33 The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria⁸⁶ and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.⁸⁷*
- *2.10.35 Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.*
- *2.10.36 Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting.*
- *2.10.39 Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.*
- *2.10.40 Proposed developments may affect the provision of public rights of way networks.*
- *2.10.41 Public rights of way may need to be temporarily closed or diverted to enable*

construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site.

- *2.10.42 Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site.*
- *2.10.43 Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.*
- *2.10.44 Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.*
- *2.10.46 Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter security measures such as fencing, electronic security, CCTV and lighting, with the measures proposed on a site-specific basis.*
- *2.10.47 Applicants should assess the visual impact of these security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site.*
- *2.10.48 Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures.*
- *2.10.49 Applications for solar farms are likely to comprise a number of elements including solar panel arrays, piling, inverters, mounting structures, cabling, earthworks, and measures associated with site security, and may also include associated infrastructure such as energy storage and electrolyzers associated with the production of low carbon hydrogen.*
- *2.10.59 Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects.*
- *2.10.60 As set out above applicants will consider several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land-use, and ability to mitigate environmental impacts and flood risk.*
- *2.10.65 Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.*
- *2.10.66 Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed."*

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- 8.36 Clean Power 2030 Advice on Achieving Clean Power for Great Britain by 2030, NESO, November 2024 and Clean Power 2030 Action Plan: A New Era of Clean Electricity December 2024 include the “a trebling of solar to 47GW by 2030”.

Climate Change & Net Zero

Kyoto Protocol (2005)

- 8.37 In 2005, the Kyoto Protocol came into effect providing the first ever framework for international climate action. Under the Protocol, the United Kingdom, together with 37 other industrialised countries, committed to reducing greenhouse gas emissions by 5.2% from 1990 levels by the year 2012.

UN Framework Convention on Climate Change: The Paris Agreement (2015)

- 8.38 The central aim of the Paris Agreement is to strengthen the global response to the threat of climate change by keeping a global temperature rise below 2 degrees and to pursue efforts to limit the temperature increase even further to 1.5 degrees. Additionally, it aims to strengthen the ability of countries to deal with the impacts of climate change. To reach these ambitious goals appropriate financial flows, a new technology framework, and an enhanced capacity building framework will be put in place, thus supporting action by developing countries and the most vulnerable countries, in line with their own national objectives. The Agreement also provides for enhanced transparency of action and support through a more robust framework.

Climate Change Act (2008) - Net Zero 2050 (2019)

- 8.39 The Climate Change Act (2008) (2050 Target Amendment) Order 2019ⁱⁱⁱ sets a legally binding target for reducing greenhouse gas ('GHG') emissions, in particular carbon dioxide ('CO₂'). As originally enacted, these targets include a reduction of GHG by 100% (on 1990 levels) by 2050 and a requirement that domestic emissions are reduced by no less than 3% each year. In setting these targets, the Act established the Committee for Climate Change ('CCC'), which is responsible for setting interim binding targets over five-year periods.
- 8.40 In May 2019, the CCC recommend a new emissions target for the UK: a 100% reduction ('net zero') of emissions by 2050. This change in legislation mandating a 100% reduction in CO₂ emissions by 2050 was approved by the House of Commons on 24th June 2019 and the House of Lords on 26th June 2019 and is now the Government's statutory carbon reduction obligation.
- 8.41 Chapter 6 of CCC's 'Net Zero – The UK's Contribution to stopping global warming' report refers to delivering a net zero emissions target. It sets out actions, including the transition to a net zero economy and what is needed to underpin net zero delivery. 'Part B' sets out key near-term actions to put the UK on track and recommends that more rapid electrification must be accompanied by greater build rates of low carbon generation accompanied by measures to enhance the flexibility of the electricity system.

IPCC Special Report on Global Warming of 1.5°C (2018)

- 8.42 An IPCC Special Report was prepared discussing the potential impacts of global warming of 1.5°C above pre-industrial levels and related global GHG emission pathways in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. The report sets out that pathways limiting

global warming to 1.5°C with no or limited overshoot requires rapid and far-reaching transitions in energy, land, and infrastructure, and deep emissions reductions in all sectors. A 'wide portfolio' of mitigation options and a significant upscaling of investments in those mitigation options is needed.

National Infrastructure Strategy – Fairer, Faster and Greener (November 2020)

- 8.43 The National Infrastructure Strategy (NIS) sets out the Government's plans to deliver on its ambition, being 'deliver an infrastructure revolution: a radical improvement in the quality of the UK's infrastructure to help level up the country, strengthen the Union, and put the UK on the path to net zero emissions by 2050'.
- 8.44 The NIS is relevant to the Development as it sets out how the Government will address the issues we face and how it will build back fairer, faster and greener. The NIS aims to provide investors with clarity over the Government's plans so they can look at the UK with confidence and help deliver the upgrades and projects needed across the country.

Energy White Paper (December 2020)

- 8.45 'The Energy White Paper – Powering our Net Zero Future' (the 'White Paper') was published as a long-term strategic vision for the UK energy system. It establishes the Government's goal of a decisive shift from fossil fuels to clean energy in power, buildings, and industry, whilst creating jobs and growing the economy. The White Paper is clear that: "Onshore wind and solar will be key building blocks of the future generation mix, along with offshore wind."
- 8.46 Renewable energy generation from solar has been identified by the White Paper as a key element of the future energy mix in the UK. It states that the UK needs:
- "...sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net zero emissions in all demand scenarios."

Net Zero Strategy: Build Back Greener (October 2021) (December 2020)

- 8.47 The Net Zero Strategy sets out policies and proposals which ensure the UK is in accordance with upcoming carbon budgets and Nationally Determined Contributions ('NDC'). NDCs provide a mechanism for countries to voluntarily impose national emission limits under the Paris Agreement. The strategy seeks to realise a decarbonised economy by 2050.

Landscape

- 8.48 "Climate change is now **the biggest threat** to natural world heritage" (IUCN¹⁰, 2020).
- 8.49 "Climate change is the biggest threat to nature and the historic environment" (National Trust¹¹).
- 8.50 NPPF paragraph 124 states:
- "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions".*
- 8.51 NPPF paragraph 125 states:

¹⁰ [Climate change now top threat to natural World Heritage – IUCN report | IUCN](#)

¹¹ [Protecting our environment and climate | National Trust](#)

"Planning policies and decisions should:

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

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

8.52 NPPF paragraph 162 talks of taking *"a proactive approach to mitigating and adapting to climate change, taking into account the long term implications for [amongst others] landscapes"*.

8.53 NPPF paragraph 165 states:

"To help increase the use and supply of renewable and low carbon energy and heat, plans should:

a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts);

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development"

8.54 NPPF paragraph 166 states:

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

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

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

8.55 NPPF paragraph 163 states:

"When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future;

b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions"

8.56 NPPF paragraph 187 states:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and **providing net gains for biodiversity**, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.

8.57 The Landscape Institute is clear that “We are in a climate and biodiversity crisis. The evidence of the multiple negative effects of climate change and biodiversity loss is clear, and humanity must take urgent, collective action to prevent global temperature rises and further ecosystem collapse. Governments have begun to address this challenge at the national and international level. The Climate Change Act (2008) made the UK the first country to establish a long-term, legally binding framework to cut emissions. In 2015, the UN Paris Agreement set the goal to limit global warming to below two degrees Celsius compared to pre-industrial levels. And in 2019, the UK Government committed to reach net zero emissions by 2050. As those who work to connect people, place, and nature, landscape professionals are uniquely placed to galvanise and lead a built environment response to this crisis [...] Supporting renewable energy development: Finding ways to enable renewable energy infrastructure within rural landscapes” (Landscape for 2030, The Landscape Institute 2021).

8.58 The Landscape Institute is also clear that “We are in a climate and biodiversity **crisis**. The science is absolutely clear that the impacts of climate change and biodiversity loss **are happening now**. I know many of us are seeing this in our everyday lives. Last year the Landscape Institute took the step of declaring an emergency; we knew as a profession that we had to take action, and fast. **We have under a decade to limit global warming to a maximum of 1.5°C.¹ Anything short of this goal will see worsening droughts, floods and extreme heat, throwing millions worldwide into jeopardy. At home we are already seeing the effects: more than two-fifths of UK species have experienced significant decline in recent decades.** Landscape professionals are uniquely positioned to tackle this crisis head-on. [...] **The climate and biodiversity emergencies are the challenge of our lifetime** and as landscape professionals, we must play a key role in defining the path forward. We have the power to create resilient places and restore natural habitats, and be low carbon when we do so. We can make a difference. The time to deliver is now. [...] Our Royal Charter requires us work for the benefit of people, place and nature. In fulfilling

our mission and our public interest duties, the Landscape Institute declared a climate and biodiversity emergency in June 2019 – a first among the UK built and natural environment professional bodies” (Climate and biodiversity action plan, The Landscape Institute’s commitment to addressing the climate and biodiversity emergencies, 2020).

- 8.59 The Royal Town Planning Institute and the Town and Country Planning Association are both very clear that *“Addressing climate change must be a central priority of the planning system if we are to secure our future economic, environmental and social wellbeing. This guide sets out some of the ways that local authorities and communities can make a real difference in tackling the climate crisis. The threat of climate change is real, and time is running dangerously short. A resilient and sustainable future is achievable, but only if we act now”* (The Climate Crisis, A Guide for Local Authorities on Planning for Climate Change, TCPA, 2023).

Biodiversity

- 8.60 Paragraph 193 of the NPPF provides clear principles for decision making on planning applications in relation to biodiversity, and that is to:

- *Refuse planning permission if significant harm to biodiversity cannot be avoided*
- *Not normally permit development that would have an adverse impact on an SSSI*
- *Refuse planning permission for development that results in loss or deterioration of irreplaceable habitats*
- *Integrate opportunities to improve biodiversity into development, especially where this achieves net gains for biodiversity.*

Heritage

- 8.61 The National Trust (with a membership of over 5.3million and a land holding of 250,000 hectares¹²) is clear¹³ that:

“The National Trust cares for more than 28,500 buildings across England, Wales and Northern Ireland, housing museum collections totaling over one million items. Over the long term climate change is likely to be the biggest threat they face”.

- 8.62 The National Trust has also said¹⁴:

*“Climate change is **the biggest threat to the coastline, countryside and historic buildings** we care for. Our new report reveals how we’re tackling its causes and effects and identifying future hazards. From protecting and planting trees to working with coastal communities, helping people, heritage and nature adapt to a changing climate is at the heart of everything we do*

*If urgent and large-scale action isn’t taken to address climate change, we predict that **more than 70 per cent of the places in our care will be at medium or high risk of climate-related hazards by 2060.** We gained a better understanding of risks such as flooding and coastal erosion in 2021 with the launch of our Climate Change Hazard Map – a tool that continues to play a key role in how we plan our work to help places adapt to a changing climate. The new layers we’ve added to the map also allow regional teams to flag*

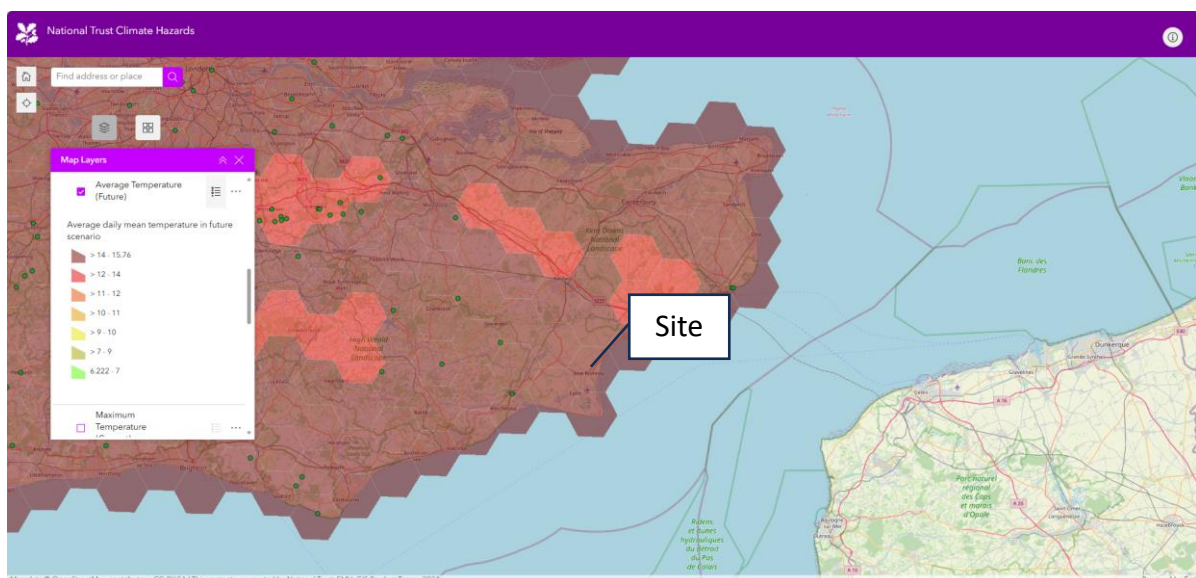
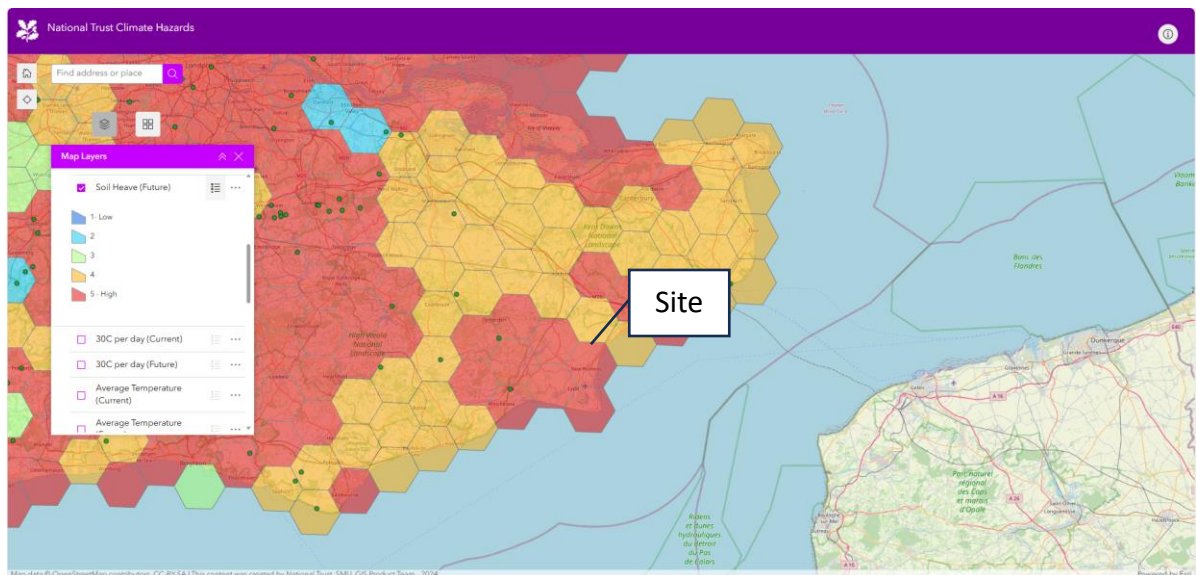
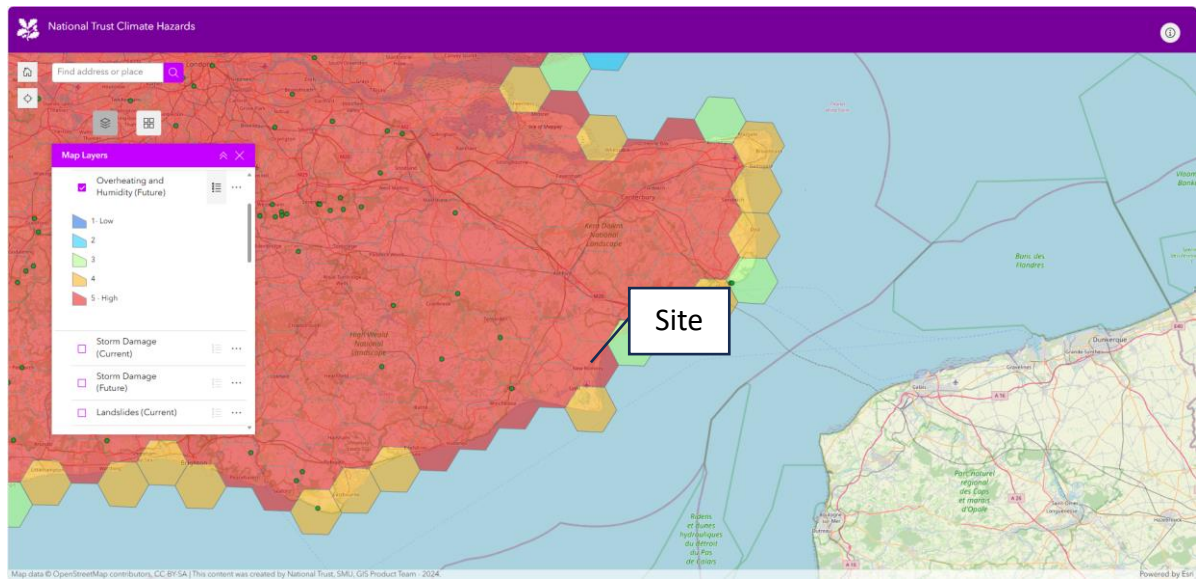
¹² National Trust 2020-21 annual survey)

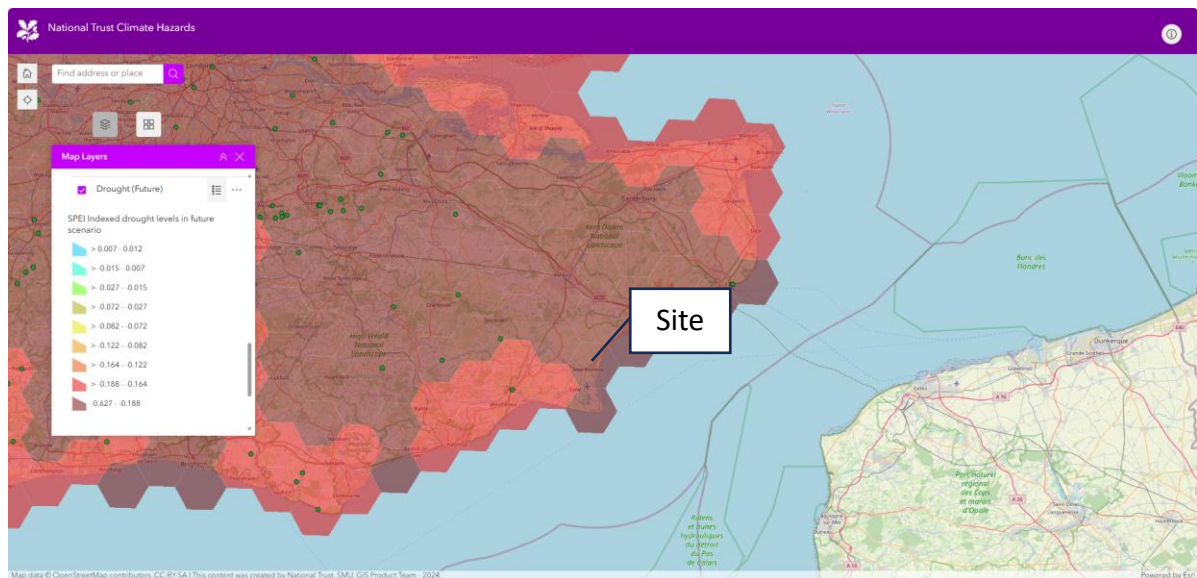
¹³ A Climate for Change: Adaptation and the National Trust (2023)

¹⁴ How We’re Adapting to Climate Change [Adapting for climate change | National Trust](#)

localised threats posed by climate change”.

8.63 Extracts of datasets from the National Trust Climate Change Hazard Map are inset below:





8.64 Historic England is clear¹⁵ that:

"The climate, energy and biodiversity crisis will affect every aspect of Historic England's work. [...] Sustainable energy sources are critical in reducing climate change".

8.65 NPPF 207. *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation".*

8.66 NPPF 210. *"In determining applications, local planning authorities should take account of:*

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness".*

8.67 NPPF 214. *"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification".*

8.68 NPPF 215. *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable*

¹⁵ Heritage and Climate Change (Historic England 2022)

use”.

- 8.69 NPPF 216. *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.*
- 8.70 Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a listed buildings or its setting, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.

Special considerations affecting planning functions

66 General duty as respects listed buildings in exercise of planning functions.

- (1) In considering whether to grant planning permission [F165 or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

- 8.71 NPPF 212. *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”.*

Economic Development

- 8.72 NPPF paragraph 85 states that: “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity”.
- 8.73 The recent Bewley Homes judgement has clarified that this does not necessarily translate to a generic significant weighting to all economic development. In a recent Secretary of State decision only limited weight was given to economic benefits arising from construction activities only. In our opinion this was incorrect on both the level of weighting, and the apparently narrow understanding of how renewable energy developments contribute to economic development.
- 8.74 Our contention is that economic development associated with renewable energy goes far beyond the construction activities and includes the wider contribution that net zero industries make to the wider UK economy, including in the professional, design and engineering fields, as well as the indirect benefits of stabilised and secure domestic energy production, and its onward benefit to energy costs. Examples are given below for the avoidance of doubt.

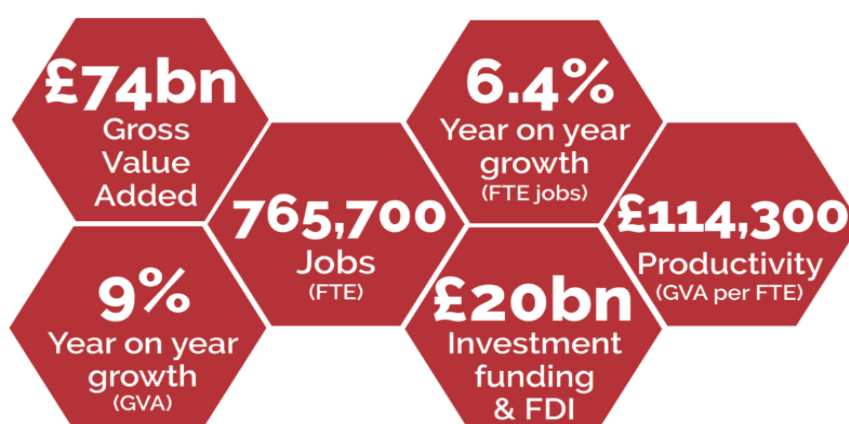
The scale of the net zero economy

Net zero activity already forms a key part of the UK economy, creating innovation-led, high-value employment opportunities and attracting foreign direct investment.

The net zero economy spans a number of new and emerging sectors, such as renewables, carbon capture, or green finance, as well as more traditional, established sectors, such as manufacturing.

This latest analysis shows that these businesses contributed £74 billion in Gross Value Added (GVA) in 2022-23, which is equivalent to 3.8% of the UK economy – larger than the economy of Wales (£66 billion). They also supported 765,700 Full Time Equivalent (FTE) jobs, equal to nearly 3% of total UK employment.

Their contributions include the value generated by their own activity (£25 billion) and their employees (218,500 jobs) as well as the wider economic contributions they supported through their expenditure with suppliers and the expenditure of their employees on goods and services. In essence, due to these wider spillover benefits, for every £1 million in GVA contributed by net zero businesses, nearly £2 million more was added through these wider economic contributions.



[Energy & Climate Intelligence Unit | The UK's net zero economy \(eciu.net\)](https://eciu.net)

Our transition to a green and sustainable future will provide new opportunities to grow and level up the UK economy and support hundreds of thousands of green, high skilled jobs, whilst ensuring the environment is in a better state for the next generation. The policies and ambitions we have committed to will help leverage around £100 billion of private investment as we develop new industries and innovative low carbon technologies, and our ambitions will support up to 480,000 jobs in 2030.

Green jobs and skills data

It is estimated that since November 2020, over 80,000 green jobs are currently supported, or in the pipeline across the UK economy as a result of new government policies and spending. Our ambitions could support up to 480,000 jobs in 2030.

The Government is working with the Office for National Statistics (ONS) to improve data on the green economy. The ONS estimate a 16% increase in direct employment in low carbon businesses across the economy from 2020 to 2021 - reaching nearly 250,000.

[Powering Up Britain - The Net Zero Growth Plan \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Low carbon and renewable energy economy, UK: 2022

Estimates of the size of the UK's low carbon and renewable energy economy, including turnover and employment.

This is the latest release. [View previous releases](#)

Contact:
[Environmental Surveys team](#)

Release date:
8 March 2024

Next release:
To be announced

1. Main points

- UK low carbon and renewable energy economy (LCREE) turnover and employment estimates are both at their highest level since the first comparable figures in 2015.
- UK LCREE turnover (in current prices) increased by an estimated 28.0% between 2021 and 2022, from £54.2 billion to £69.4 billion.
- UK LCREE employment also increased, by an estimated 8.0% between 2021 and 2022, from 252,300 to 272,400 full-time equivalents (FTEs).
- The low carbon electricity group within LCREE had the highest turnover (£29.0 billion) in 2022, while the energy efficient products group had the largest employment (134,900 FTEs).
- Electricity, gas, steam and air conditioning supply had the highest turnover among LCREE industries (£22.0 billion, 31.7% of the total) in 2022, while construction had the largest employment (99,100 FTEs, 36.4% of the total).

[Low carbon and renewable energy economy, UK - Office for National Statistics \(ons.gov.uk\)](#)

8.75 We also contend that the vital nature of these considerations affords significant weight to be given in support of the economic development associated with renewable energy as a matter of principle.

8.76 Footnote 43 to paragraph 85 of the NPPF directs the reader to the Government's Industrial Strategy 2017¹⁶.

8.77 The Industrial Strategy includes 'Clean Growth' as a key part of the UK's industrial strategy and states:

"Prospering from the energy revolution – Around 80 per cent of global energy use still comes from fossil fuels. To preserve a safe and stable climate, this has to change fast. Countries all over the world are moving to renewable energy, with investment more than doubling over the last decade".

8.78 The Industrial Strategy links to the UK's Clean Growth Strategy 2017¹⁷. It states that:

¹⁶ [Industrial Strategy: building a Britain fit for the future \(web-optimised PDF\) \(publishing.service.gov.uk\)](#)

¹⁷ [Clean Growth Strategy \(publishing.service.gov.uk\)](#)

"Capturing part of the global opportunity while continuing to drive down carbon emissions from our own activities could provide a real national economic boost. The UK low carbon economy could grow by an estimated 11 per cent per year between 2015 and 2030 – four times faster than the rest of the economy²⁵ – and could deliver between £60 billion and £170 billion of export sales of goods and services by 2030²⁶. This means that clean growth can play a central part in our Industrial Strategy – building on our strengths to drive economic growth and boost earning power across the country. Action to deliver clean growth can also have wider benefits. For example, the co-benefit of cutting transport emissions is cleaner air, which has an important effect on public health, the economy, and the environment".

8.79 Both the Industrial and Clean Growth strategies link to the British Energy Security Strategy 2022¹⁸, which states:

"Energy is the lifeblood of the global economy. From heating our homes to powering our factories, everything we do depends on a reliable flow of affordable energy.

So as the global economy reopened in the aftermath of the pandemic, the sudden surge in demand for everything from new cars to foreign holidays drove a massive spike in demand for oil and gas, dramatically increasing the price of these essential fuels.

This has been compounded by Russia's abhorrent and illegal invasion of Ukraine. As we are part of a global market, the price we pay for gas is set internationally. And President Putin has used this against us by restricting the supply of Russian gas to the European market, further pushing up prices. The vital sanctions imposed by the UK and its allies to support the Ukrainian people will also inevitably have an adverse effect on all economies.

As a result of all these factors, European gas prices soared by more than 200% last year and coal prices increased by more than 100%. This record rise in global energy prices has led to an unavoidable increase in the cost of living in the UK, as we use gas both to generate electricity, and to heat the majority of our 28 million homes.

The government's immediate priority has been to provide financial assistance to families and businesses struggling with higher energy bills. But when the UK is spending the equivalent of over £1,200 per person this year, just to service the national debt, we cannot afford merely to rely on taxpayer funding to assist with paying ever higher bills; we need to bring down the bills themselves.

The first step is to improve energy efficiency, reducing the amount of energy that households and businesses need. We have already saved households on the lowest incomes around £300 a year on bills through energy efficiency measures – and we are investing over £6 billion on decarbonising the nation's homes and buildings. But the long-term solution is to address our underlying vulnerability to international oil and gas prices by reducing our dependence on imported oil and gas.

Even as we reduce imports, we will continue to need gas to heat our homes and oil to fill up our tanks for many years to come – so the cleanest and most secure way to do this is to source more of it domestically with a second lease of life for our North Sea. Net zero is a smooth transition, not an immediate extinction, for oil and gas.

Accelerating the transition away from oil and gas then depends critically on how quickly we can roll out new renewables. The government's Ten point plan for a green industrial

¹⁸ British energy security strategy - GOV.UK (www.gov.uk)

revolution', together with the 'Net zero strategy' and this Energy Strategy, is driving an unprecedented £100 billion of private sector investment by 2030 into new British industries including offshore wind and supporting around 480,000 clean jobs by the end of the decade.

The growing proportion of our electricity coming from renewables reduces our exposure to volatile fossil fuel markets. Indeed, without the renewables we are putting on the grid today, and the green levies that support them, energy bills would be higher than they are now."

8.80 We trust that it is clear that not only does the renewables industry generate significant revenue for the UK economy, but it is also an engine of green skills and education, and a key part of the wider strategy for economic recovery and onward green growth.

8.81 We contend that it follows that the weight to be given by decision makers to economic development generated by the renewables industry is significant, regardless of the size of the proposal, because even small-scale projects provide a valuable contribution to significantly cutting greenhouse gas emissions, boosting the green economy and upskilling the UK low carbon and renewable energy workforce.

8.82 NPPF paragraph 87 is clear that:

"Planning policies and decisions should recognise and address the specific locational requirements of different sectors".

8.83 It is as essential for a solar farm to be near its point of grid connection as it is for a haulage firm to be near the primary/strategic road network or for a high-tech research and development company to be near to academic, educational and knowledge resources.

9. Planning Balance

- 9.1 In considering the weight that should be afforded to each consideration in the overall planning balance, we apply a scale of minor, moderate and significant in terms of benefits and disbenefits and a scale of minor, moderate and significant/substantial/great (which we interchange synonymously and as the NPPF prescribes).
- 9.2 In other words, significant/substantial/great are equivalent at the top of my scale, and the NPPF does not say otherwise.

Material Consideration weighting in favour of the scheme

The Need for Renewable Energy Generation

- 9.3 The Appeal scheme would supply 24.2MW to the National Grid, providing the equivalent annual electrical need of approximately 10,600 homes.
- 9.4 As explained above, there is an urgent and compelling need for this development and very strong policy support for solar development to help increase the supply of renewable energy.
- 9.5 The NPPF says that local plans should provide a positive strategy for energy that maximises the potential for suitable development and that plans should consider identifying suitable areas for renewable energy schemes.
- 9.6 In addition, the Council has chosen to not take up the advice in the original 2012 NPPF “to consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources” and ever since “Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas”.
- 9.7 This failure to identify areas for renewables in tantamount to failing to allocate sites for housing, meaning that developers must find their own sites and therefore it will be necessary for speculative schemes to come forward to meet need.
- 9.8 In reviewing appeal decisions and SoS decisions since summer 2024, we note that there is very clearly a consistent approach from the Secretary of State and appointed Inspectors in determining solar farm appeals over the last 2 years that either ‘substantial’ or ‘significant’ weight should be given to this benefit. This approach accords with the range of information stressing the urgent and significant need for additional renewable energy generation which we have set out above.
- 9.9 As we have identified above, The Clean Power 2030 Action plan is the latest statement of policy from the new Government, published in December 2024. This includes an objective of creation of essential new energy industries as a key aspect of the overall economic growth plan, targeting specifically 45-47 GW of solar power by 2030.
- 9.10 The appeal scheme would make a fast and locally valuable contribution to this, and this should be given substantial weight in the planning balance.
- 9.11 All parties are in agreement of the urgent need for renewable energy, and the significant or substantial weight that should be given to this scheme’s contribution to that increasingly urgent need.

9.12 Taking all the above into account, we are of the opinion that, due to the imperative to deliver renewable energy schemes which can assist in decarbonising the UK's electricity supply, that the benefit of a 24.2MW solar farm's renewable energy generation is a significant benefit that should be afforded significant weight in favour of the grant of planning permission in this appeal.

Climate Emergency

9.13 We have quoted the following globally-notable people and organisations on this topic:

- The "biggest threat modern humans have ever faced" (United Nations Press Release SC/14445, 23rd February 2021).
- "Doubling the number of those [species] at risk of extinction" (Nature, Research Highlights, 2nd June 2023) and "Accelerating the Earth's sixth mass extinction" (the Smithsonian, 30th April 2015).
- "In the longer term dominating the top 10 risks global populations will face" (World Economic Forum, Global Risks Report 2024).
- The "biggest threat to global economy" (United Nations, 14th January 2016). "An existential threat" (US President Joe Biden to the UN, July 2023).

9.14 We have also quoted organisations closer to home on this topic:

- *"We are in a climate and biodiversity crisis. The science is absolutely clear that the impacts of climate change and biodiversity loss are happening now"* (The Landscape Institute 2020).
- *"We are in a climate and biodiversity crisis. The evidence of the multiple negative effects of climate change and biodiversity loss is clear, and humanity must take urgent, collective action to prevent global temperature rises and further ecosystem collapse"* (The Landscape Institute 2021).
- *"If urgent and large-scale action isn't taken to address climate change, we predict that more than 70 per cent of the places in our care will be at medium or high risk of climate-related hazards by 2060"* (Historic England 2022).
- *"The National Trust cares for more than 28,500 buildings across England, Wales and Northern Ireland, housing museum collections totalling over one million items. Over the long term climate change is likely to be the biggest threat they face"* (National Trust 2023).
- *"The threat of climate change is real, and time is running dangerously short. A resilient and sustainable future is achievable, but only if we act now"* (RTPI & TCPA 2023).
- *"If urgent and large-scale action isn't taken to address climate change, we predict that more than 70 per cent of the places in our care will be at medium or high risk of climate-related hazards by 2060"* (National Trust 2024).

9.15 A national climate emergency was declared by the UK Parliament April 2019.

9.16 At a local level, Folkestone joined over 300 Local Authorities in England and voted to declare a climate emergency later in July 2019.

9.17 Through the generation of renewable energy, we consider that the scheme will contribute towards assessing these declaration of climate emergencies.

-
- 9.18 The Clean Power 2030 Action Plan is the latest statement of government underlining the objective of urgently delivering clean energy to limit our contribution to the damaging effects of climate change. The call to act with urgency adds to the weight which we consider would be accorded to the climate emergency. As we have noted, this scheme has an agreed grid connection with immediate capacity and is intended to export power to the grid quickly upon the grant of planning permission.
- 9.19 By providing a positive, deliverable action on these statements of intent and incomparable quotations, we consider that the declaration of climate emergencies at both national and local level is a material consideration which should afford significant weight in the planning balance.

Energy Security

- 9.20 The Appeal Scheme will supply renewable energy to the National Grid, comprising secure, distributed and diversified energy generation which fully accords with the Government policy on energy security, set out in greatest detail in Powering Up Britain: Energy Security Plan 2023.
- 9.21 We consider that energy security should be regarded as a material consideration in its own right, one which is separate to the generation of renewable energy per se. This is because of its contribution to national security (reducing reliance on imported energy from volatile international sources) but also its contribution to the economy and the income of ordinary people through stabilised and/or reduced energy bills.
- 9.22 Renewable energy generation by virtue of its contribution to reducing carbon emissions and the drive to decarbonise the electricity system is a separate and distinct type of benefit i.e. there could be an energy security crisis without a climate crisis.
- 9.23 In this regard, we draw attention to the latest published version NPS EN-3 which, when setting the policy for Solar Photovoltaic Generation at Section 2.10, refers at paragraph 2.1.9 to solar playing a key part of the government's strategy for low-cost decarbonisation of the energy sector in the context of the net zero emission pathway to 2050; but then in a separate following paragraph 2.10.10 goes on to state that:

"Solar also has an important role in delivering the government's goals for greater energy independence ...".

- 9.24 In the Cutlers Green Lane appeal, the Inspector in allowing an appeal for a solar farm afforded substantial weight to the contribution the development would make to a low carbon economy and the provision of low cost and secure energy. Similarly, in the cases of Kemberton and Great Wheatley Farm the renewable energy benefit of the proposal in terms of its contribution towards energy security and resilience was afforded "substantial weight". The Southlands decision affords even greater weight to energy security, whereby the Inspector states:

"There is an urgent need for renewable energy to mitigate the climate emergency, achieve net zero targets and enable energy security and lower energy bills. Together with the other benefits set out above, these matters weigh very substantially in favour of the development."

- 9.25 Given the clear importance of these government policy statements, we are firmly of the opinion that delivering energy security is both 'urgent' and of 'critical importance' to the country, and as such should be regarded as a significant benefit of this development

which should be afforded significant weight in favour of the grant of planning permission in the planning balance.

Good Design

- 9.26 National design policy for all development is provided by the NPPF.
- 9.27 National design policy specifically for renewable and low carbon energy development is contributed to by NPS EN1 and EN3.
- 9.28 Both are material considerations.
- 9.29 The overall design and layout of the scheme has been designed from the outset to minimise harm within the site and wider area, whilst providing significant multiple benefits.
- 9.30 This positive approach to design chimes with that outlined in NPS EN-1, which, such is its importance in considering design, we think bears repeating here (my emphasis):

"4.7 Criteria for good design for Energy Infrastructure

*4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But **high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object** – be it a building or other type of infrastructure – including fitness for purpose and sustainability, **is equally important.***

*4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic **as far as possible.** It is acknowledged, however that **the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.**"*

- 9.31 We have explained above, that a similar dynamic exists at the local level, with 'generic' design policy applicable to all forms of development provided in policy SSE and HB1 and design policy specifically for renewable energy development in policy CC6.
- 9.32 In the local design policy tug of war we often find that the 'generic' design policies of local plans are ill-suited to the particularities of renewable energy and that we find the policy written for the purpose to be far more useful in decision making.
- 9.33 The scheme will comprise good functional design, utilizing the latest technology including in this case bifacial panels (which can absorb light on both the 'top' surface and, to a lesser extent the underside), and the multiple land uses (pastoral farming and BNG) are an efficient use of land that has the added benefit of returning it to its current use in a better state than it is now.
- 9.34 We note that at the Honiley appeal the secretary of state and the Inspector considered that the use of efficient technology enabling efficient use of land would be accorded moderate weight in favour of the proposal.
- 9.35 The NPPF is clear that significant weight should be given to development which reflects local design policies. We remain content that the scheme complies with the design expectations of the local plan policy insofar as they can reasonably be applied, in the context of the national policy statements.

9.36 On the basis that, the scheme represents good design, this is a material consideration of at least moderate benefit to which we attach significant weight in favour of granting planning permission in this appeal.

Grid Connection

9.37 It is well established that grid-connections are a scarce resource in the UK and represent a major barrier to the transition to net zero. The Powering Up Britain Energy Security Strategy 2023 explains that connections times are a very significant issue, with over 250GW of generation in the transmission queue. To put the scale of that connection queue into context, that is over 3 times the schemes currently connected into the grid of 80GW.

9.38 EN 3 paras 2.10.22 to 2.10.25 acknowledges the capacity of the local grid network to accept the likely output from a proposed solar farm as being critical to the technical and commercial feasibility of a development proposal and that the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal. Para 2.10.25 states that:

“To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity.”

9.39 We have referred above to the opportunity which the scheme presents to utilise an early grid connection and that this will assist in fulfilling the objectives of the Clean Power 2030 Action Plan.

9.40 The need to take up the opportunity for an early grid connection was recognised by the Planning Inspector in determining the appeal in the Southlands appeal noting:

“It is therefore important, to meet the urgent need for solar energy, for capacity to be taken up where it is available and the prospect of an early connection for the appeal scheme is an important factor in its favour.”

9.41 In the Chelmsford solar appeal the Inspector accepted that a solar farm requires grid capacity and a viable connection to operate. He further considered that as such, this requirement places a locational restriction on site selection that limits the number of appropriate sites for such a facility, and he further noted that the national grid suffers capacity difficulties and limits suitable points of connection. He concluded that this ‘rational approach’ to site selection lent support for the selected site.

9.42 In November 2024, the Inspector at Southlands disagreed with the assessment of the appeal parties that moderate weight be applied to the available grid connection allowing an early contribution to legally binding targets for net zero. Instead, the Inspector accorded this significant weight, as a result of the urgency of need and the difficulties experienced in obtaining grid connections currently.

9.43 We therefore conclude that the availability of grid capacity combined with a secured grid connection offer for the scheme is a significant benefit that warrants significant weight in favour.

Biodiversity and Net Gain

9.44 There is a declared ecological emergency. Not a problem, or a challenge; an emergency.

Responding to an emergency should only and ever be given significant weight in support, and we are not alone in thinking this. With regard to the weight recently attached at other solar PV appeals to net gains in excess of the 10% minimum, we note the vast majority give significant, substantial or very substantial weight in favour.

- 9.45 Going beyond the development statistics, the Journal of Nature has said that climate change is “Doubling the number of [species] at risk of extinction” and the Smithsonian has stated that climate change is “*Accelerating the Earth’s sixth mass extinction*”.
- 9.46 The Landscape Institute is clear that “*We all, individually and professionally, have a role to play in addressing this crisis*”.
- 9.47 The RTPI and TCPA are clear that “*We have three shared messages for planners and the wider community: 1 Ensure that tackling the climate crisis is at the heart of the vision for the future of our communities. 2 Recognise how vital planning is to securing that vision – both directly, through facilitating the extension of renewable energy generation, and strategically, through practical nature-based solutions and design actions that can promote sustainable travel, urban cooling, or natural flood defence. 3 Finally, recognise how many of the actions necessary to tackle the climate crisis are also key in creating healthy, ecologically rich, prosperous and beautiful places for us and for future generations*”.
- 9.48 The State of Nature Report is very clear that “*The UK distributions of 4,979 invertebrate species have on average decreased by 13% since 1970*” and “*Nature needs space to live and flourish, but around the globe we humans have decreased and diminished those spaces. This is especially the case in the UK. There are substantial negative consequences of living in a nature-depleted country. These include impacts on human health, and direct costs associated with adaptation to lost and damaged ecosystem services. For example, pollinating insects are worth millions of pounds to UK agriculture, and their population declines threaten food production*” and “*the UK is now one of the most nature-depleted countries on Earth*”.
- 9.49 In the context of a declared biodiversity crisis, sometimes referred to as ‘the sixth mass extinction’, we give the benefits of exceeding BNG a significant level of benefit to which significant weight should be applied.

Green Infrastructure Benefits

- 9.50 We note the landscape mitigation and enhancement works proposed including new infilled hedgerow planting, tree planting and enhancement of field margins through proposed species-rich grassland. The extensive green infrastructure proposed for the scheme are identified in the Landscape Strategy.
- 9.51 Those measures would serve to create a more coherent landscape framework across the site which would deliver a number of moderate (in scale) long-term benefits to which we give moderate weight.

Air Quality

- 9.52 Renewable energy reduces greenhouse gas emissions, which drive global warming, but are also harmful to human health more directly. This is a clear minor benefit (measurable benefit) to which we apply moderate weight (because its human health).

Farm Diversification

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- 9.53 The scheme is a rural development that will benefit the farmer by diversifying his income, and solar farms are now a common feature of the countryside across the UK.
- 9.54 The solar farm will support the rural economy through farm diversification, allowing continued agricultural use for sheep grazing and ensuring that decommissioning after the 40-year operational period will see the land returned to (at least) its current condition.
- 9.55 We note that the NPPF confirms that planning decisions should enable the development and diversification of agricultural and other land based rural businesses.
- 9.56 It is widely acknowledged that farming is becoming less and less viable and when farmers are beginning to rely upon innovative farm diversification schemes to support and complement traditional farming practices.
- 9.57 The National Farmers Union see renewable energy as an important step towards making British agriculture carbon neutral within two decades, an important consideration as farming is responsible for around one tenth of UK greenhouse gas emissions.
- 9.58 We consider that the rural economic benefits delivered by the proposal in terms of farm diversification are of moderate extent (minimal benefit as part of the national picture but significant local benefit to the farmer and local rural economy) should in itself be granted moderate weight in favour of the grant of planning permission.

Economic Development

- 9.59 NPPF paragraph 85 states that: *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity”*.
- 9.60 NPPF paragraph 87 is clear that: *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors”*.
- 9.61 The recent Bewley Homes judgement has clarified that this does not necessarily translate to a generic significant weighting to all economic development.
- 9.62 Economic development associated with renewable energy goes far beyond the site-specific construction activities and includes the wider contribution that net zero industries make to the wider UK economy, including in the professional, design and engineering fields, as well as the indirect benefits of stabilised and secure domestic energy production, and its onward benefit to energy costs.
- 9.63 We also contend that the vital nature of these considerations affords significant weight to be given in support of the economic development associated with renewable energy as a matter of principle when viewed through the prism of the government’s aspirations for a ‘green industrial revolution’.
- 9.64 Footnote 43 to paragraph 85 of the 2023 NPPF directed the reader to the Government’s Industrial Strategy 2017. The Industrial Strategy includes ‘Clean Growth’ as a key part of the UK’s industrial Strategy. The Industrial Strategy links to the UK’s Clean Growth Strategy 2017. Both the Industrial and Clean Growth strategies link to the British Energy Security Strategy 2022, and beyond that to Powering Up Britain Net Zero Growth Plan.
- 9.65 Bringing these references up to date, Footnote 43 of the NPPF refers to “Invest 2035: The UK’s Modern Industrial Strategy [which] “identifies priority sectors for growth and support as: [amongst others] clean energy industries”.

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- 9.66 Clean Power 2030 Action Plan 2024 (pages 20, 43 and 44) identifies significant beneficial impact for businesses from clean power, including price stability, market certainty encouraging investment and job opportunity. The Action Plan places the clean energy industries as a priority growth sector as part of the Government's Industrial Strategy. Clean energy is noted as creating employment and delivering price stability which is crucial for businesses.
- 9.67 Not only does the renewables industry generate significant revenue for the UK economy, but it is also an engine of green skills and education, and a key part of the government's wider strategy for economic recovery and onward green growth.
- 9.68 At the Bramley appeal, the Inspector afforded 'significant' weight to economic benefits associated with that solar farm scheme (paragraph 79).
- 9.69 It follows that the weight to be given by decision makers to economic development generated by the renewables industry is significant, regardless of the size of the proposal, because even small-scale projects provide a valuable contribution to significantly cutting greenhouse gas emissions, boosting the green economy and upskilling the UK low carbon and renewable energy workforce.
- 9.70 In this case a moderate level of benefit accrues to the green economy which requires constant investment, innovation and support, to which significant weight should be applied.

BMV Land

- 9.71 The proposed use of the land for solar is for a temporary period, and will be associated with continued agricultural production through grazing, this will allow an improvement in soil through resting the land from arable production and will have no significant impact on food production.
- 9.72 The proposal will not result in permanent or even temporary loss of BMV land for agriculture and the balance of harms and benefits discussed above falls to a minor level of benefit to which we attribute a minor degree of weight in favour.

Material Considerations which are harms

Effect on Landscape

- 9.73 The landscape is under threat from climate change. This is acknowledged by no less than the Landscape Institute, the RTPI and the TCPA. Whether this be by biodiversity and habitat loss, or unpredictable and potentially adverse changes to 'English' landscape character.
- 9.74 The LVIA concludes that "Whilst there would be some adverse effects on landscape character, these would be confined to the site and its immediate surroundings and would not impact on the character of the wider area to any substantial degree".
- 9.75 We consider that these matters should be afforded moderate weight because the landscape is not designated.
- 9.76 We note that harm arising from the proposal would diminish as the proposed landscape mitigation planting matures. We also note that landscape mitigation will leave a positive legacy beyond the 40 year development lifespan.

Effect on Visual Amenity

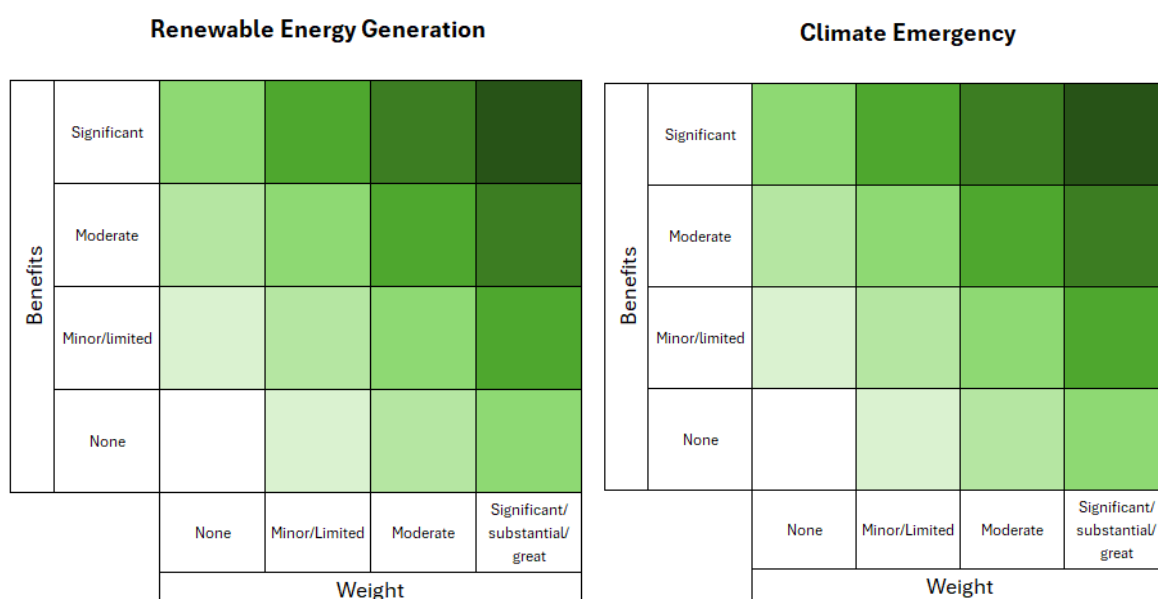
- 9.77 The LVIA concludes that “There would also be some adverse effects on visual receptors located mostly in close proximity to the site. This would include recreational routes, including the footpath running through the site, where users would have a direct view of the proposed development, but this would be short lived and proposed planting will provide screening over time. Beyond the site extents as the mitigation takes effect and the planting on the site grows and matures, these adverse effects would reduce”.
- 9.78 We consider that these matters could be moderate weight because the landscape is not designated and the expectations of walkers might be lower than elsewhere (the AONB for example). We also note that the development is time limited for a temporary period of the 40 years.

Heritage

- 9.79 The heritage report is clear that:
- There will be no direct impacts on any designated heritage asset as a result of the Proposed Development
 - Due to the limited nature of the ground-breaking required, the impact of the Proposed Development is assessed as being less than substantial in accordance with the NPPF
- 9.80 The harm would be removed following the decommissioning of the solar farm and removal of associated infrastructure. Making the harm temporary in line with the lifespan of the development and short in terms of the ‘lifespan’ of the heritage assets which are measured in terms of centuries.
- 9.81 The NPPF is clear that great weight should be applied to assets’ conservation, and not necessarily to any harms. But it is common practice to apply great weight to harms, and on a precautionary basis we do so to the less than substantial harms here.

Summary graphics

- 9.82 The concept of varying levels of benefits and harms, and how different weights can be applied can be difficult to visualise. The graphics below are designed to convey the balance of harms and benefits.



Energy Security

Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

Good Design

Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

Grid Connection

Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

Biodiversity

Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

Green Infrastructure

Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

Air Quality

Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
		Weight			

Farm Diversification

Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
Weight					

Economic Development

Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
Weight					

BMV

Benefits	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
Weight					

Heritage

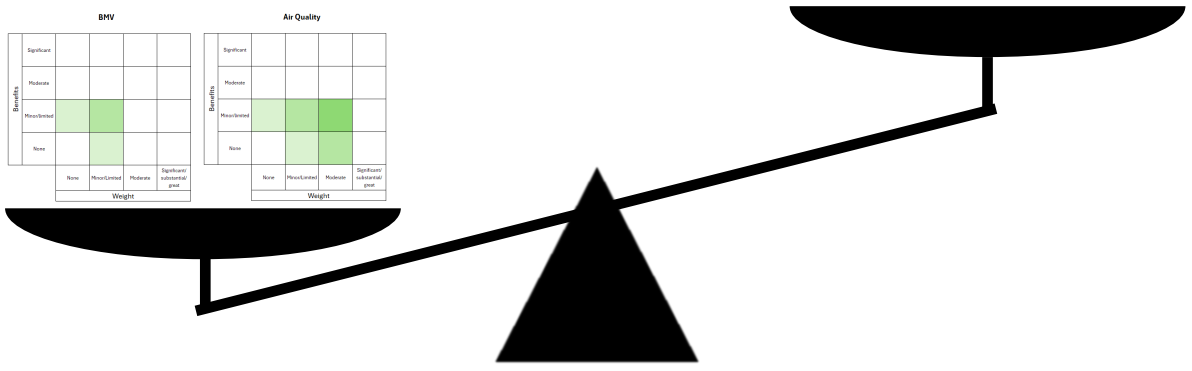
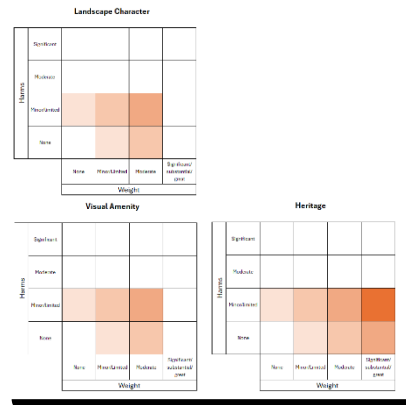
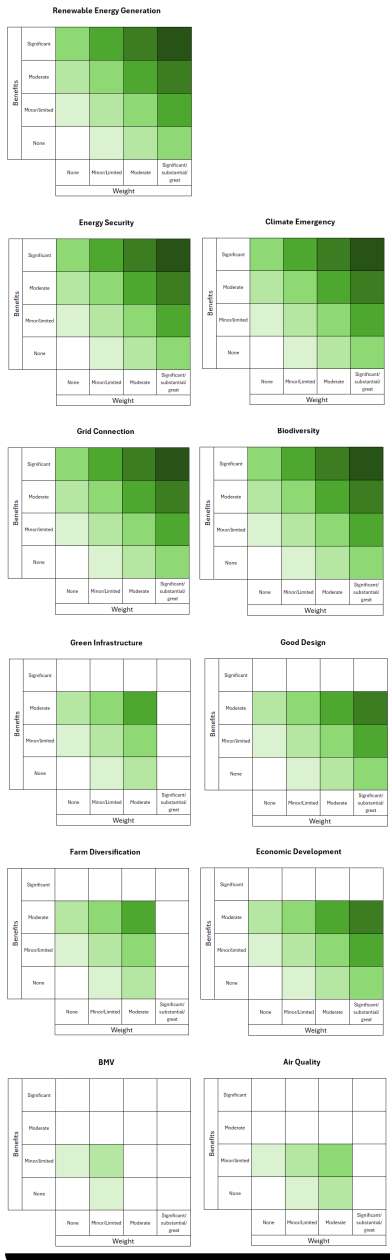
Harms	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
Weight					

Landscape Character

Harms	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
Weight					

Visual Amenity

Harms	Significant				
	Moderate				
	Minor/limited				
	None				
		None	Minor/Limited	Moderate	Significant/ substantial/ great
Weight					



10. Conclusion

- 10.1 There is a climate and ecological emergency, ongoing, now.
- 10.2 Time is running out to hold global temperature rises at the 1.5 degree increase threshold.
- 10.3 Time is running out to try to slow the pace of biodiversity loss.
- 10.4 The implications of climate change to the economic, social and environmental aspects of life, both now, and increasingly in the future cannot be understated.
- 10.5 Sites that are 'ready to go' because they have an available point of connection are a vital part of the country's and the county's efforts towards not just reaching net zero, but, perhaps, exceeding it; not just limiting global warming at 1.5 degree, but reducing it.
- 10.6 Renewable energy development is inherently sustainable development, excelling as it does in all three overarching objectives:
 - An economic objective – supporting green growth and investment
 - A social objective – helping to reduce the human health effects of climate change, and addressing the issues of energy cost and security
 - An environmental objective – not only contribution to reducing biodiversity loss, but providing a legacy of biodiversity gains as well as helping to protect our natural and heritage assets for the longer term.
- 10.7 The NPPF is very clear on the approach to be taken to this planning application:
 - *"The planning system should support the transition to a low carbon future in a changing climate [...] 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 157) and
 - "Approve the application if its impacts are (or can be made) acceptable" (paragraph 163).
- 10.8 One needs only turn on the news to see communities, homes, infrastructure, flora, fauna and heritage assets washed away in flooding, or burned to ash in wildfires.
- 10.9 Planning applications, and not least those for renewable energy development, are a trade-off.
- 10.10 Approving this planning application 'trades off' some landscape and visual 'discomfort' for some for a temporary period of time.
- 10.11 Refusing this planning application 'trades off' a basket of matters far more important.
- 10.12 In our opinion, under the dire circumstances that climate change undeniably presents, a temporary harm should be allowed for the greater gain.
- 10.13 We respectfully suggest this planning application should be granted.