



North Weald Solar Farm

Planning Statement

On behalf of **Voltalia UK Ltd**



Project Ref: 33313438100 | Rev: A | Date: February 2024

Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU
Office Address: 2 Whitehall Quay, 4th Floor, Leeds. LS1 4HR
T: 0113 322 3420 E: Leeds.uk@stantec.com

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	Name	Position	Signature	Date
Prepared by:	BB	Planner	BB	January 2024
Reviewed by:	KC	Senior Planner	KC	January 2024
Approved by:	SN	Director	SN	January 2024
For and on behalf of Stantec UK Limited				

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1 Introduction

1.1.1 This Planning Statement has been prepared by Stantec on behalf of Voltalia UK Ltd (hereafter referred to as the 'Applicant') and provides information in support of the full planning application on Land at North Weald, West of Croxton, Huntingdonshire (hereafter referred to as the 'Site') for the following Proposed Development:

“Installation and operation of a renewable energy generation and storage station comprising ground-mounted photovoltaic solar arrays together with battery storage containers, inverter/transformer units, control house, substations, onsite grid connection equipment, storage containers, site access, access gates, internal access tracks, security measures, other ancillary infrastructure, landscaping and biodiversity enhancement.”

1.1.2 This Statement sets out the details of the Application and should be read in conjunction with the drawings and information accompanying the planning application.

1.1.3 The remainder of this statement comprises the following chapters:

- Section 2.0 provides a description of the Site, its surroundings and any relevant planning history of the Site;
- Section 3.0 describes the Proposed Development in more detail;
- Section 4.0 sets out the need for renewable energy and the sustainability implications of the Proposed Development;
- Section 5.0 sets out the Statement of Community Involvement;
- Section 6.0 sets out the relevant national, regional and local planning policies and guidance relevant to the Site and the Proposed Development;
- Section 7.0 considers the main planning issues and provides an assessment of how the Application complies with planning policy; and
- Section 8.0 summarises the Planning Statement and draws conclusions.

1.2 Voltalia UK Ltd

1.2.1 Voltalia UK Ltd has grown to become an international Energy Producer and Service Provider. They specialise in renewable energy solutions that help their clients join the global energy and ecological transition movement and reduce their carbon emissions by purchasing green energy from Voltalia. Voltalia's teams work on all steps of project development, from assessing potential sites and securing grid connections, obtaining permits and authorizations and construction and operation of consented sites.

1.2.2 Voltalia is the first company in its sector and the third company listed on the Euronext regulated market to become a Mission-Driven company, Voltalia is pursuing its commitments and embedding Corporate Social Responsibility (CSR) more deeply within the Company's business and sustainable growth model. The first mission report was published in 2022, presenting their roadmap and results in order to clearly lay out their mission at every level of the company.

1.2.3 As an Independent Power Producer, in 2020 Voltalia UK Ltd produced 3.7TWh of renewable energy around the world, using its own production assets avoiding 1,436 kilotonnes of CO2 equivalent.

1.3 Application Submission Documents

Table 1.1 Plans and documents that are submitted with the application.

Document	Reference	Consultant
Reports		
Application Form		Stantec
Planning Statement		Stantec
Design and Access Statement		Stantec
Agricultural Land Classification Report	C972	Askew Land & Soil Limited
Arboricultural Impact Assessment	5400	Barton Hyett Associates
Ecological Impact Assessment	P23-053	BSG Ecology
Flood Risk Assessment	V067-DOC01-FRA	PFA Consulting
Glint and Glare Assessment	11981C	Pager Power
Heritage Impact Assessment	MK0804_1	Cotswold Archaeology
Landscape Visual Impact Assessment	34381/A5/LVIA	Stantec
Noise Impact Assessment	22-330	inacoustic
Statement of Community Involvement		Thirty 4/7
Transport Statement	2206-072/TS/01	tpa
Plans		
Site Location Plan	NOR01_DV_EL_DRA_LOC_PLA N-07-01	Voltalia
Site Plan	NOR01_DV_EL_DRA_GEN_IMP-07-02	Voltalia
Site Plan (with National Highways Overlay)	NOR01_DV_EL_DRA_GEN_IMP-07-02A	Voltalia
Customer Substation Details	DV_HV_201_02_00	Voltalia
Storage Container	DV_HV_301_02_00	Voltalia
Cable Cross Section Details	DV_HV_302_02_00	Voltalia
Access Track Details	DV_CS_202_02_00	Voltalia
O & M Storage Container	DV_CS_402_02_00	Voltalia
Fence and Gate Details	NTW01-SD-02	Voltalia
Control House Details	NTW01-SD-04	Voltalia
Typical CCTV Details	NTW01-SD-06	Voltalia
Inverter/Transformer Details	NTW01-SD-07	Voltalia
Customer Delivery Station	NTW01-SD-08	Voltalia
Battery Container	NTW01-SD-10	Voltalia
MV Transformer	NTW01-SD-11	Voltalia
Power Control System	NTW01-SD-12	Voltalia
Structure Array Details	NTW01-SD-13	Voltalia
DNO Substation Details	004PTI01-DV_HV_101_02_00	Voltalia
Landscape Strategy Plan	LN-LP-08	Stantec

2 Site and Planning History

2.1 Site Location

- 2.1.1 The Site is made up of three main parcels of land, the two largest are located to the north and south of Cambridge Road (A428) and under the Proposed Development will be the location of the solar arrays. The third, smaller parcel of land, is located to the north east of the remainder of the Site, to the east of Toseland Road. This will be the location of the Battery Energy Storage System (BESS) and the Point of Connection (PoC) to the National Grid. The red line boundary for the Site also includes the cable run which will travel from the two parcels at Cambridge Road to the PoC. The Site is predominantly within an area under the jurisdiction of Huntingdonshire District Council (hereafter referred to as the 'Council'), however a small proportion of the cabling route is located within the jurisdiction South Cambridgeshire District Council.



Figure 1.1: General locational context of the site

2.2 Site Description

- 2.2.1 The Site measures 78.45 hectares (ha) in area and comprises arable farmland with fields broken up by ditches, intermittent hedgerows or tree lines, and small waterbodies. There are no dwellings located within the Site boundary, however North Farm and North Farm Barn are located immediately south of the parcel of land to the north of Cambridge Road. Elisley Manor Nursing Home is located to the south of Cambridge Road, directly adjacent to the southern parcel of the Site. The nearest settlement is the village of Croxton, located approximately 500m east of the Site.
- 2.2.2 The Site is formed of three main parcels of land, the two largest are bisected by the Cambridge Road (A428). The proposed areas of solar arrays are located both to the north and south of Cambridge Road with the southern parcel being separated by a proposed archaeological exclusion area and existing PROW. In addition to this, a smaller parcel of land, approximately 800 metres to the north east of the Site, is proposed to be used as the location for the BESS and contains the agreed PoC to the National Grid. The proposed BESS Site will be separated from the remainder of the Site by the new proposed Black Cat to Croxton dual carriageway.

- 2.2.3 The Site has a predominantly flat topography and is well contained by existing vegetation which is proposed to be further enhanced through additional planting. The Site comprises agricultural land, with pockets of woodland and existing vegetation. Other land uses nearby include several isolated residential properties and commercial/ light industrial use at Whitehall Farm Units.
- 2.2.4 Whilst there are no designated heritage assets within the Site, there are a number of heritage assets within proximity to the Site. Namely, the Scheduled Monument of the Deserted Village (site of) Weald located immediately to the west of the Site. Other heritage assets within proximity to the Site include the Grade II Listed North Farmhouse referred to above.
- 2.2.5 The Site is located within Flood Zone 1, meaning that it is at low probability of flooding.
- 2.2.6 A public footpath runs through the southern parcel of the Site travelling from Weald in the west to Croxton in the east (Abbotsley Footpath No.8). Abbotsley Bridleway No.12 and No.7 run close to the western boundary of the Site. The proposed scheme has taken account of this through the layout of the solar arrays proposed.
- 2.2.7 The Site and its surroundings are not subject to any other statutory or non-statutory ecological, environmental or planning based designations.

2.3 Planning History

- 2.3.1 The Site has a limited planning history; notably one application submitted by the Applicant which sought an EIA Screening Opinion for the development currently proposed (Application Ref: 21/70087/SCRE). An EIA Screening Opinion was issued in November 2021 which confirmed that the Proposed Development does not constitute EIA development.
- 2.3.2 A pre-application request was also submitted to the Council, a response to which was received in April 2021. The Council's response was generally supportive of the Proposed Development in principle subject to the detailed consideration of the impacts on the rural character of the landscape, setting of heritage assets and residential amenity. The response highlighted the following policies to be of relevance to the development proposed:

Huntingdonshire Local Plan

- LP1 – Amount of Development
- LP2 – Strategy for Development
- LP5 – Green Infrastructure
- LP10 – The Countryside
- LP11 – Design Context
- LP12 – Design Implementation
- LP14 – Amenity
- LP17 – Parking Provision and Vehicle Movement
- LP29 – Health Impact Assessment
- LP30 – Biodiversity and Geodiversity
- LP31 – Trees, Woodland, Hedges and Hedgerows
- LP34 – Heritage Assets and their Settings
- LP35 – Renewable and Low Carbon Energy

Supplementary Planning Guidance

- Huntingdonshire Design Guide (2017)

- Huntingdonshire Landscape and Townscape Assessment (2007)

2.3.3 Since the receipt of pre-application advice from the Council, some changes have been made to the Proposed Development, including changes to the red line boundary to include additional land to the south.

2.3.4 Given the changes made an updated Screening Opinion was sought in June 2023 (Application Ref: 23/70048/SCRE). The issued EIA Screening Opinion confirmed that the Proposed Development does not constitute EIA development.

2.4 Other Relevant Applications

2.4.1 As noted above, the Site is bisected by a proposed highway improvement scheme, this is the development of a new dual carriageway which is now under construction. The route is located immediately to the south of the BESS area. The new dual carriageway is anticipated to reduce traffic along the A428 (to be renamed B1428). The Black Cat to Caxton Gibbet Improvement Scheme has been taken into consideration as part of the Proposed Development and plans showing how the two developments interact have been provided in support of this application. Voltalia UK Ltd have been in discussions with National Highways to understand any potential for conflicts between the two developments, in particular in relation to the proposed cable crossing. The proposed crossing points and cabling arrangements along Toseland Road have been agreed in principle with National Highways prior to this application being submitted.

2.4.2 There are no operational solar developments of this scale within proximity to the Site. However, there are some smaller scale solar developments nearby, one of which is an existing solar scheme with a capacity of 5MW which is located 2km to the south west of the Site.

2.4.3 There is also an application for solar development of a similar scale to the proposed (49.9MW capacity) (application ref: 23/01507/FUL). This application site is located approximately 3.4km to the south west of the site. At the time of writing the application is expected to be decided by 5th March 2024.

3 The Proposed Development

3.1 Proposed Solar Farm and BESS

- 3.1.1 The Applicant is proposing to develop a Solar PV Farm and BESS on Land at North Weald, West of Croxton, Huntingdonshire. The Site measures 78.45 hectares.
- 3.1.2 The Site will comprise a series of solar arrays with an export capacity of up to 49.9MW. In addition to the solar arrays, the Proposed Development will include a BESS system of approximately 50MW (exact capacity to be confirmed through detailed design) and associated infrastructure including security fencing and security gates, cabling, inverters and transformers, control house, containers, weather station, CCTV, Customer substation and DNO substation, temporary construction compound, and enhanced vegetation and planting.
- 3.1.3 The PV panels will be supported by metal frame posts which will be driven into the ground at an approximate depth of 1.5m. The distance between arrays may vary due to topography but will typically be between 3-4m. The top of the arrays will measure up to 3.4 metres in height.
- 3.1.4 Access to the northern solar field is proposed to be taken from the existing unadopted single track road to the west of Weald Cottages and access to the southern fields is from the existing track to the west of Eltisley Manor, both taken from the A428 Cambridge Road. The BESS will be accessed from Toseland Road. Vehicular movements relating to the solar farm and BESS will be very minimal once operational and will generally consist of transit van-type vehicles assessing and managing the Site an average of twice a month for maintenance purposes.
- 3.1.5 The PRoW is proposed to be maintained on its mapped alignment and will remain open throughout the construction of the Proposed Development.
- 3.1.6 Trees and hedgerows within the Site and adjacent to the Site boundary will be preserved and enhanced as part of the Proposed Development. Hedgerow planting and other landscaping will be incorporated into the proposals to enhance the existing landscape as well as mitigate against any potential visual effects. The proposed planting includes the restoration of lost ancient hedgerow boundaries and the 'gapping-up' of existing vegetation. Wildflower seed planting is proposed throughout the Site, including underneath each solar array, this will provide additional biodiversity enhancements on Site. All proposed landscaping on Site is illustrated in the Landscape Strategy Plan.
- 3.1.7 The Proposed Development will play a significant role in combating climate change and our transition towards a low carbon future by providing electricity to the local and national grid.
- 3.1.8 The Proposed Development is a temporary structure proposed for a period of 35 years. Following this period, the Site will be restored to its present condition, with a commitment to closely replicate its current use, enhanced by the proposed landscaping improvements which would be retained. The decommissioning of the solar farm would be subject to a reasonably worded planning condition, as is common across the solar industry.

4 Planning Policy Context

4.1.1 This section of the Planning Statement outlines the relevant planning policy context for the Proposed Development and considers national and local policy and guidance. For reference, the following documents are considered the most relevant:

- Huntingdonshire District Council Local Plan to 2036;
- Supplementary Planning Guidance and other relevant documents including:
- Huntingdonshire Design Guide (2017); and
- Huntingdonshire Landscape and Townscape SPD (2022).
- National Planning Policy Framework ('NPPF');
- The National Planning Practice Guidance ('NPPG');
- BRE planning guidance for development of large-scale ground mounted solar PV systems (October 2013); and
- National Policy Statements (NPS) for Energy Infrastructure

4.2 Huntingdonshire District Local Plan to 2036

4.2.1 The Huntingdonshire District Local Plan was adopted in May 2019 and is used to determine planning applications in the District.

4.2.2 The main policy of relevance is **Policy LP35 (Renewable and Low Carbon Energy)** which states *that a renewable energy generating scheme (other than wind energy) would be supported where it is demonstrated that all potential adverse impacts including cumulative impacts are or can be made acceptable.* The policy notes that *when identifying and considering the acceptability of potential adverse planning impact their significance and level of harm will be weighed against the public benefits of the proposal.* Further to this it states that having identified impacts the proposal should first seek to avoid the impact, then minimise the impact. Sufficient evidence will be needed to demonstrate that all reasonable efforts to avoid, minimise and compensate for have been fully addressed.

4.2.3 Paragraph 8.52 of the Local Plan states that 'Potential adverse impacts to be identified will include, but will not be limited to':

- Any on the surrounding environment;
- Amenity, and in particular impacts from noise, light or odour;
- Heritage assets and/or their settings;
- Biodiversity;
- Landscape and Visual Amenity; and
- The potential for cumulative impacts will need to be considered and addressed.

4.2.4 Policy LP 35 also states that provision will be made for the removal of apparatus and reinstatement of the site to an acceptable condition.

4.2.5 Paragraph 8.58 notes proposals for Solar Farms should follow best practice guidance such as that available from the Solar Trade Association and from the BRE. Developers should be aware

of the high proportion of high quality agricultural land (grades 1 and 2) in the district, with reference to the requirements of policy LP 10 'The Countryside'.

4.2.6 **Policy LP2** (Strategy for Development) outlines the development strategy for Huntingdonshire which includes the provision of complementary green infrastructure enhancement and provision to balance recreational and biodiversity needs and to support climate change adaptation.

4.2.7 **Policy LP3** (Green Infrastructure) states that proposals will be expected to support green infrastructure and will therefore be supported where it demonstrates that it:

- a) Incorporates open/green space in accordance with the Council's Developer Contributions Supplementary Planning Document (2011) (SPD), or successor documents;
- b) Protects and where possible enhances existing green infrastructure, concentrating efforts on protecting, enhancing or creating links within, to and between green infrastructure priority areas and the Cambridgeshire Strategic Green Infrastructure Network;
- c) Is consistent with the objectives of the Cambridgeshire Green Infrastructure Strategy (2011) or successor documents;
- d) Improves accessibility, naturalness and connectivity of green spaces, assisting in achieving Natural England's Accessible Natural Green Space Standards (ANGSt);
- e) Provides replacement provision where the proposal would result in harm to or loss of existing green infrastructure where the replacement provides a net benefit, judged in terms of the factors set out in the Cambridgeshire Green Infrastructure Strategy (2011);
- f) Maintains and where appropriate enhances the rights of way network; and
- g) Contributes to the re-naturalisation of water bodies such as rivers and lakes, where possible.

4.2.8 **Policy LP5** (Flood Risk) states that proposals will only be supported where all forms of flood risk, including breaches of flood defences or other defence failures, have been addressed.

4.2.9 **Policy LP10** (The Countryside) states that development in the countryside will be restricted to the limited and specific opportunities as provided for in other policies of this plan. All development in the countryside must:

- a) Seek to use land of lower agricultural value in preference to land of higher agricultural value:
 - i. Avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) where possible, and avoiding Grade 1 agricultural land unless there are exceptional circumstances where the benefits of the proposal significantly outweigh the loss of land;
- b) Recognise the intrinsic character and beauty of the countryside; and
- c) Not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others.

4.2.10 Other relevant policies include:

- Policy LP11 – Design Context
- Policy LP12 – Design Implementation
- Policy LP14 – Amenity
- Policy LP17 – Parking Provision and Vehicle Movement
- Policy LP30 – Biodiversity and Geodiversity

- Policy LP31 – Trees, Woodlands, Hedges and Hedgerows
- Policy LP34 – Heritage Assets and their Settings

4.3 Huntingdonshire Design Guide (2017)

4.3.1 The design guide provides guidance on the delivery of high-quality and well-designed new developments.

4.4 Huntingdonshire Landscape and Townscape SPD (2022)

4.4.1 The document intends to support the delivery of Huntingdonshire's Local Plan to 2036 and was formally adopted in March 2022. The Local Plan policies most relevant to this SPD and the Proposed Development include:

- LP10 – The Countryside
- LP35 – Renewable and Low Carbon Energy

4.4.2 A key theme throughout the document is that development proposals should, where possible, incorporate renewable energy generation.

4.5 National Planning Policy Framework

4.5.1 The NPPF, which was revised in December 2023, plays a key role in securing radical reductions in greenhouse gas emissions and providing resilience to the impacts of climate change, whilst supporting the delivery of renewable and low carbon energy and associated infrastructure.

4.5.2 The NPPF emphasises the importance of sustainable development. Paragraph 7 identifies that 'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'. Paragraph 8 sets out the three overarching objectives including an environmental objective that the planning system should "*contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*"

4.5.3 Paragraph 124a identifies how planning policies and decisions should 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.

4.5.4 Chapter 14 seeks to set out how the challenge of climate change can be met. In paragraph 157 the NPPF importantly says:

"It (the planning system) 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."

4.5.5 Paragraph 160 states:

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

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that the adverse**

impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

- b) consider identifying areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”

4.5.6 Crucially, Paragraph 163 sets out that:

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

- a) **Not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and**
- b) **Approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria use in identifying suitable areas.**
- c) **In the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site, and approve the proposal if its impacts are or can be made acceptable”**

4.5.7 Chapter 16 of the NPPF deals with ‘Conserving and Enhancing the Historic Environment’. The NPPF recognises that heritage assets are an irreplaceable resource which ‘should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations’ (para 195). The NPPF requires the significance of heritage assets to be considered in the planning process, whether designated or not.

4.6 National Planning Practice Guidance

4.6.1 In March 2014, the Government published its online National Planning Practice Guidance (NPPG). This web-based resource was accompanied by a Written Ministerial Statement which included a list of the previous planning practice documents now cancelled. The NPPG contains various guidance of relevance to the registration, processing and consideration of planning applications.

4.6.2 The NPPG offers practical advice in relation to the following areas, of relevance to the Proposed Development:

- Renewable and low carbon energy;
- Climate change; and
- Natural environment

4.6.3 In terms of renewable and low-carbon energy, the NPPG states that:

“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 location where the local environmental impact is acceptable.”

4.6.4 The NPPG also recognises a number of key factors to be considered by a local authority in determining an application, which includes:

- Where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.
- That solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use;
- the proposal’s visual impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety;
- the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;
- the need for, and impact of, security measures such as lights and fencing;
- the potential to mitigate landscape and visual impacts through, for example, screening with native hedges;
- the energy generating potential, which can vary for a number of reasons including, latitude and aspect.

4.7 National Policy Statements (NPS) for Energy Infrastructure

4.7.1 The NPS provide planning guidance for developers of nationally significant energy infrastructure projects. The NPS was originally published in 2011 and has been revised in November 2023.

NPS EN-1

4.7.2 NPS EN–1 covers overarching National Policy Statements for Energy. 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)”.

4.7.3 EN-1 clearly sets out the need for new low carbon energy infrastructure to contribute to climate change mitigation. Paragraph 3.3.19 highlights that ‘given the changing nature of the energy landscape, we need a diverse mix of electricity infrastructure to come forward, so that we can deliver a secure, reliable, affordable, and net zero consistent system during the transition to 2050 for a wide range of demand, decarbonisation, and technology scenarios.’ EN-1 then goes on to state 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’.

4.7.4 At Paragraph 4.1.7, the NPS advises that while applicants are required to mitigate particular impacts of renewable energy development as far as possible, it considers that there would still be residual adverse effects after the implementation of such mitigation measures, and that these residual adverse effects should be weighed against the benefit of the Proposed Development.

4.7.5 Section 5.10 of EN-1 considers Landscape and Visual Impact. It highlights ‘virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation’. It also goes on to state that it needs to be considered whether any adverse impact on the landscape is temporary and will be capable of being reversed.

4.7.6 Section 5.11 of EN-1 is in regard to Land use. It states that applicants should preferably use land in areas of poorer agricultural quality and where schemes are sited on BMV land, it should be demonstrated to be necessary (as has been done within the ASA submitted with this application).

NPS EN-3

4.7.7 NPS EN-3 provides more specific information on renewable energy infrastructure.

4.7.8 EN-3 contains a section dedicated to solar photovoltaic generation (section 2.10). At paragraph 2.10.13 EN-3 recognises solar farms as one of the most established renewable electricity technologies in the UK, and the cheapest form of electricity generation.

4.7.9 EN-3 details factors that should influence site selection by applicants, these are:

- Irradiance and site topography
- Network connection
- Proximity of a site to dwellings
- Agricultural land classification and land type
- Accessibility
- PRow
- Security and lighting

4.7.10 EN-3 highlights within sections 2.1.24 and 2.10.25, 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. 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.' This demonstrates the importance of proximity to a network connection in selecting a site.

4.7.11 Regarding agricultural land classification, EN-3 states within paragraph 2.10.29 that 'land type **should not** be a predominating factor in determining the suitability of the site location' (our emphasis). Paragraph 2.10.31 goes on to state that it is recognised that for large scale projects, it is likely development will use some agricultural land, and that applicants should explain their choice of site.

4.7.12 Regarding visual impact and residential amenity, EN-3 paragraph 2.1.95 states that due to their nature, solar farms are likely to be in 'low lying areas of good exposure and as such may have a wider zone of visual influence' but that with effective screening, the impact could be minimised.

4.8 BRE planning guidance for development of large scale ground mounted solar PV systems (October 2013)

4.8.1 Despite the age of the above guidance the previous pre-application response included a note on the 2013 BRE Guidance, as such we have included some further detail on this below.

4.8.2 Figure 8 Steps for developers on ALC indicates that if the ALC is grade 3, it should be specifically assessed to establish whether the land meets the criteria for grade 3a or 3b.

4.8.3 If the agricultural classification is 3a, the developer's proposal should:

1. Provide an explanation of why the development needs to be located on the site and not on land of a lesser agricultural classification within the area.
2. Provide information on the impact of the Proposed Development on the local area's supply of farming land within the same classification.
3. If the Proposed Development site makes up part of an existing farm, provide information on the viability of this farm to continue function (as an agricultural unit) with the development in situ.
4. Consider the cumulative impact of the Proposed Development and other permitted large scale solar PV developments on the supply of agricultural land within the same classification across the local area.

4.8.4 If the agricultural classification is 3b, no additional information is required, unless the agricultural practice that the proposal would replace (if that practice cannot be continued with the proposal in situ) makes a special contribution to the environment or local economy.

5 The Climate Emergency

5.1 Summary of the climate emergency

- 5.1.1 In the UK the main strategy for tackling climate change is to significantly reduce greenhouse gas emissions by creating a low carbon economy. As more than two thirds of the world's carbon dioxide emissions come from the way we produce and use energy, energy policy must play a major part in meeting the climate change challenge.
- 5.1.2 Although the Government is implementing measures to save energy at the same time energy demand worldwide continues to increase. Therefore, a key element of the Government's energy strategy is to provide support for low carbon technologies and in particular incentivise the development of renewable technologies used to generate electricity.
- 5.1.3 Considering the risk posed by climate change and depleting fossil fuel reserves the Proposed Development represents an important part of the UK's strategy to reduce carbon dioxide emissions and improve security of energy supply. The remainder of this section identifies the context and policy framework which underpin the need for the Proposed Development.

5.2 The urgent need for development

- 5.2.1 In June 2019, an amendment was made to the Climate Change Act 2008 which introduced a legally binding target to achieve 'net zero' by 2050. The amendments require the net UK carbon account for the year 2050 to be at least 100% lower than the 1990 baseline.
- 5.2.2 Furthermore, in 2019, the United Kingdom became the first country in the world to declare a climate emergency. Whilst there is no fixed definition of what this involves, it requires urgent action to reduce or halt climate change to prevent further environmental damage. The declared climate emergency is a culmination of climate warnings issued in recent decades.
- 5.2.3 Following the declaration of a climate emergency, the Government published an Energy White Paper entitled 'Powering our Net Zero Future' in December 2020; a Net Zero Strategy entitled 'Build Back Greener' in October 2021 and in April 2022, the 'British Energy Security Strategy'.
- 5.2.4 As recently as March 2023 the Government reconfirmed its commitment to scale up energy generation, boost energy security and deliver world-leading approach to net zero¹.
- 5.2.5 It is widely accepted that greenhouse gas emissions need to be significantly reduced and in 2005 the Kyoto Protocol came into effect providing the first ever framework for international action. Under the Protocol, the United Kingdom, together with 37 other industrialised countries (called "Annex I countries"), committed themselves to reducing greenhouse gas emissions by 5.2% from 1990 levels by the year 2012.
- 5.2.6 Furthermore, the Paris Agreement is a legally binding international treaty on climate change with the overarching goal is to hold "the increase in the global average temperature to well below 2°C above pre-industrial levels" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels." However, in recent years, it has been accepted there is a need to limit global warming to 1.5°C by the end of this century. To limit global warming to 1.5°C, greenhouse gas emissions must peak before 2025 and decline 43% by 2030.
- 5.2.7 The UK, along with other European countries has signed up to the European renewables directive. The purpose of the directive is to set targets for the proportion of energy each member state must generate from renewable energy sources including wind, solar, tidal and biomass. The directive states that 15 percent of total UK energy consumption should be generated from renewables by 2020, with this target rising to 80 percent by 2050.

¹ [Government multi billion pound investment in energy revolution - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/government-multi-billion-pound-investment-in-energy-revolution) (30 March 2023)

5.3 National Energy Policy

- 5.3.1 The United Kingdom's Climate Change Programme was launched in November 2000 by the British Government to tackle climate change and cut greenhouse gas emissions. To implement this strategy a raft of legislation and guidance has emerged since that time which has reinforced the national commitment towards addressing both the causes and consequences of climate change. The key initiatives and policy documentation is outlined below in date order:

Energy White Paper (2007)

- 5.3.2 The Energy White Paper sets out policy to deliver a secure, low carbon energy mix for the UK and announces specific measures that will ensure individuals; businesses and Government save energy and reduce their carbon emissions. The overarching goal is to reduce carbon dioxide emissions by some 60% by 2050, with real progress by 2020. This surpasses the initial threshold targets which were set in 1997 when the UK government committed itself beyond the Kyoto Protocol target by setting a national goal to reduce carbon dioxide emissions by 20% below 1990 levels by 2010.
- 5.3.3 The Energy White Paper sets out a framework for action to address the challenges facing the country in relation to climate change, cutting greenhouse gas emissions and the need to ensure secure energy supplies.

Climate Change Act (2008)

- 5.3.4 The Climate Change Act 2008 is the basis for the UK's approach to tackling and responding to climate change. It requires that emission of carbon dioxide and other greenhouse gases are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements.
- 5.3.5 The Climate Change Act commits the UK government to a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, to be achieved through action in the UK and abroad. Also, a reduction in emissions of at least 34% by 2020. Both targets are against a 1990 baseline.

Energy Act (2013)

- 5.3.6 The Energy Act was granted assent on 18th December 2016. Through the Energy Act, the Government aims to further its objectives to meet the UK's decarbonisation and renewable targets. The Bill will establish a legislative framework for delivering secure, affordable and low carbon energy.
- 5.3.7 One of the key elements of the Bill is the introduction of new long-term contracts to provide stable financial incentives to invest in all forms of low carbon energy generation.

Renewable Energy Directive (2018)

- 5.3.8 The Renewable Energy Directive (2018) includes a binding EU overall target for 2030 of at least 32% of energy from renewable sources.

The UK's Draft Integrates National Energy and Climate Plan (NECP), January 2019

- 5.3.9 This document emphasises the UK's commitment to maintaining a robust climate framework that takes into account evolving scientific knowledge on climate change.
- 5.3.10 In the context of the challenge posed by climate change and declining fossil fuel reserves, there is an established need for renewable energy generation. The Proposed Development comprises a Hybrid 49.9MWp Solar Photovoltaic (PV) and 50MW Battery Storage farm, which will utilise a renewable energy source for the production of electricity. The Proposed Development can make a valuable contribution to tackling climate change and producing

renewable electricity and continuing to embrace the positive steps the UK Government is making in the delivery of renewable energy capacity and output.

Energy White Paper (December 2020)

- 5.3.11 Nationally, the Government announced plans to transition to net zero by 2050 through the Energy White Paper (December 2020). The document acknowledges the need to act and achieve the target through “investment and innovation by the public and private sectors”. One of the goals to achieve net carbon energy within the White Paper is the growth of “clean energy technologies”. Page 9 of the White Paper sets out:

“Decarbonising the energy system over the next thirty years means replacing – as far as it is possible to do so – fossil fuels with clean energy technologies such as renewables, nuclear and hydrogen.”

- 5.3.12 One clear way to decarbonise the energy system is through clean electricity, which the White Paper outlines “will become the predominant form of energy, entailing a potential doubling of electricity demand and consequently a fourfold increase in low-carbon electricity generation.” To address this demand, the White Paper acknowledges that “a low-cost, net zero consistent system is likely to be composed predominantly of wind and solar” with the need for “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”.
- 5.3.13 The White Paper notes that by 2050, energy demand is likely to double as a result of increased uptake in electric vehicles and the electrification of heat, which in turn means there is a requirement for a fourfold increase in the amount of low carbon generation that is currently in the grid, in order to hit the net zero target. Essentially, we need to speed up the rate of delivery of renewable and low carbon energy compared to current delivery rates.

Local Energy Policy and Climate Emergency

- 5.3.14 Huntingdonshire District Council declared a Climate Emergency in February 2023 and adopted a Climate Strategy to set out the priorities to achieve the commitment to net zero carbon by 2040.

5.4 The Role of Battery Energy Storage Systems

- 5.4.1 Battery Storage is an advanced green technology offering energy security with the ability to store and release energy into the grid as required, so that the National Grid is more resistant to disruptions at peak times.
- 5.4.2 In addition, by storing excess renewable energy, BESS developments help contribute towards the binding climate change and emissions targets the UK has committed to under the Climate Change Act 2008. BESS will be critical in helping to fill the gap left behind by the decommissioning of coal-fired power stations.
- 5.4.3 Unlike large coal or gas power stations, BESS generators have the ability to discharge energy immediately when required by National Grid. This means they are an extremely powerful grid balancing tool that can provide fast frequency response to ever changing demand. Not keeping the grid in balance can lead to power surges or temporary blackouts. BESS has the ability to rapidly discharge to the grid, or to absorb power for redistribution later, thereby helping to keep the grid in balance. This reduces energy waste and improves efficiency. Overall, this type of technology offers great potential for supporting renewable energy and the UK’s energy system.
- 5.4.4 The need for such developments is clearly established and should be given significant weight in the determination of the application. The need is both urgent and apparent.
- 5.4.5 The Proposed Development, which has the capacity to export 49.9MW of total clean green whilst assisting in meeting the aims and objectives of delivering renewable energy. Thus,

making a contribution towards the achievement of the Government's UK Net-Zero Strategy and the British Energy Security Strategy, and meeting the declared climate emergency in the Huntingdonshire District. This is a very significant material consideration that should be given significant weight in the determination of this application as the public benefits of the scheme, along with other material considerations should outweigh any perceived harm resulting from the proposal.

5.5 The Role of Solar

- 5.5.1 Solar developments can work hand in hand with battery storage systems, solar arrays harness a natural and ever-present resource to create electricity for use across the local distribution network and wider National Grid.
- 5.5.2 Since the Climate Change Act in 2008, the UK has become increasingly reliant on renewable sources of energy with their ability to contribute to the overall supply of energy across the UK. In 2009, solar energy accounted for 0% of the UK's energy supply in the middle of summer (June). In 2023, solar energy now accounts for 9.4% of the country's energy supply with nuclear, wind and gas being the only bigger contributors.
- 5.5.3 Energy created from a solar farm is either fed directly into the National Grid or stored in BESS located within the same site or elsewhere. The location of the nearest substation is key to efficiency with solar schemes, the closer the solar arrays are to the point of connection the more energy is able to be supplied to the National Grid, increasing the distance to the substation results in energy being wasted during the transfer of energy. It is therefore imperative to locate solar developments as close to a point of connection as possible. It is also important for the identified substation to have capacity for the additional energy to be provided by the solar farm. Both of which are material considerations that should be given weight in the decision-making process.

6 Planning Policy Assessment

- 6.1.1 This section of the Planning Statement identifies the main planning considerations and provides an analysis of how the development proposals are acceptable in principle. It provides a robust case for why and how the scheme represents a sustainable form of development.
- 6.1.2 In line with legislation set out in Section 38(6) of the Planning and Compulsory Purchase Act (PCPA) all applications for planning permission should be determined in accordance with provisions set out in a development plan, unless material considerations indicate otherwise.
- 6.1.3 To demonstrate how the proposals respond to constraints and address local planning policy requirements, this section of the statement demonstrates compliance with the relevant planning policy context. The following key issues are assessed to allow the positive determination of this application:
1. The Principle of Development
 2. Other Considerations
 - Green Infrastructure/PRoW
 - Agricultural Land Classification
 - Flood Risk
 - Trees
 - Transport

6.2 Principle of Development

- 6.2.1 Policy LP 35 (Renewable and Low Carbon Energy) supports proposals for renewable energy where it is demonstrated that all potential adverse impacts including cumulative impacts are or can be made acceptable. It goes on to state that when identifying and considering the acceptability of potential adverse planning impacts, their significance and level of harm should be weighed against the public benefits of the proposal. Huntingdonshire recognise that low carbon energy is important to the UK's energy infrastructure and in efforts to achieve carbon emissions reductions. Huntingdonshire District Council declared a Climate Emergency in February 2023 and adopted a Climate Strategy to set out the priorities to achieve the commitment to net zero carbon by 2040 further highlighting their acceptance of the need to look at ways to combat and manage climate change.
- 6.2.2 Paragraph 163 of the NPPF effectively outlines a presumption in favour of renewable energy development, and there is no requirement for applicants to demonstrate the need for such proposals, and as such, applications should only be refused where there would be significant harm as a result. The NPPF glossary defines renewable energy as those energy flows that occur naturally and repeatedly in the environment including from the sun. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels). The development of a Solar Farm with BESS therefore meets these definitions. BESS are low carbon technologies which support renewable and low carbon infrastructure.
- 6.2.3 National policy is strongly supportive of renewable energy as a means of meeting our increasing energy demands, tackling climate change, addressing supply security, and transitioning to a sustainable low carbon economy. Privately funded, large scale solar developments such as this are recognised as being not just necessary but central to meeting an urgent need.
- 6.2.4 There is not a requirement within national or local policy to demonstrate the need for renewable energy. The urgency of the need for substantially greater quantities of renewable energy (including large scale solar) is self-evident given the dramatic step change in Government energy policy driven by its declared Climate Emergency to achieve a 100% reduction in greenhouse gas emissions by 2050 (Net Zero). This is a legally binding target.

- 6.2.5 UK energy policy acknowledges renewable energy developments as key to the net-zero target. The NIS states that to achieve Net Zero 2050, the power system must be carbon free and significantly larger to cope with additional demand. Solar is seen by the UK Government as one of the building blocks of the country's low-cost, net zero consistent generation mix, with a further 64GW of solar required by 2035.
- 6.2.6 It is also clear that decentralised renewables contribute to national energy security. This is particularly important when consideration is given to the role that both Solar PV and BESS play in helping to accelerate the transition away from oil and gas, which depends critically on how quickly large-scale renewables can be deployed.
- 6.2.7 The NPPG also supports this through providing for an increase in the amount of energy from renewable resources to ensure that the UK has a secure supply of energy whilst reducing greenhouse gas emissions and slow down climate change.
- 6.2.8 As set out above, Policy LP35 (Renewable and Low Carbon Energy) seeks to support proposals for the production of renewable energy where the potential for any adverse impacts are or can be made acceptable. The supporting text to the policy details the potential areas for adverse impacts which include the following:
- Any on the surrounding environment;
 - Amenity, and in particular impacts from noise, light or odour;
 - Heritage assets and/or their settings;
 - Biodiversity;
 - Landscape and Visual Amenity; and
 - Potential for Cumulative impacts.
- 6.2.9 The following section assesses the Proposed Development against each of these criteria:

Impact on the surrounding environment

- 6.2.10 The Site presently benefits from substantial screening along the boundaries adjoining Cambridge Road, this will be enhanced through additional hedgerow and native tree planting along the Site boundaries as shown on the supporting Landscape Strategy Plan. At present the proposed location for the BESS has limited screening, however, under the Proposed Development new screening will be provided in the form of new hedgerow.
- 6.2.11 As there are no landscape-based designations on or in close proximity to the Site, the potential for adverse landscape impacts are limited and localised in nature.
- 6.2.12 A Landscape Visual Impact Assessment (LVIA), undertaken by Stantec, provides an assessment of the impacts of the Proposed Development. The LVIA notes that the Site presently benefits from existing boundary vegetation which acts as screening for the Site, resulting in the Site having a limited visual envelope from the local and wider area from the outset.
- 6.2.13 Importantly, the Site's semi-rural nature will also soon change with the creation of the new A428 (the Black Cat to Caxton Gibbet scheme), which will reduce the tranquillity of the Site. The Proposed Development should be viewed in this context.
- 6.2.14 The LVIA notes that the receptors of highest sensitivity are residents off the A428. Effects of the Proposed Development on this small number of receptors are considered to be of Medium magnitude in the first year of operation which will have reduced to a Small after a 15-year period, at which point the proposed hedgerow planting and wildflower grassland will be fully established.

- 6.2.15 Overall, the proposed planting of 2km of native hedgerows, re-enforcement and long term management of existing hedgerows, delivery of 3,000m² of tussocky grassland and 1ha of native tree planting will strengthen the landscape features of the Site, provide appropriate mitigation for potential visual impacts, and provide long-term beneficial effects in terms of ecology and biodiversity
- 6.2.16 All other potential impacts from the Proposed Development on the surrounding environment during construction and operation are considered in the technical assessment provided with the application, which demonstrate that impacts are acceptable with appropriate mitigation.

Impact on amenity including noise, light, and odour

- 6.2.17 Whilst the Site location is to an extent rural in nature and outside of the built form of any settlement, there are a limited number of residential dwellings located immediately adjacent to the Site, with the nearest being North Farm and North Farm Barn, located within 40 metres of the Site boundary. At present, these properties benefit from existing hedgerows to the north which provide some limited screening towards the Site. The Proposed Development incorporates a set back from these properties and new vegetation to screen views of the proposed equipment.
- 6.2.18 In addition to this, to the south of Cambridge Road is Eltisley Manor Nursing Home. It is considered that views of the Proposed Development will be also possible.
- 6.2.19 The LVIA considers North Farm, North Farm Barn and Eltisley Manor Nursing Home as residential dwelling receptors off the A428. It is considered that in the first year of operation, the visual amenity effects on residents of these dwellings are considered to be of Medium magnitude, they will reduce to a magnitude of Small by year 15 once the proposed landscaping has become fully established.
- 6.2.20 As a Public Right of Way (PRoW) passes through the Site, there is potential for amenity impacts on users prior to mitigation. Under the Proposed Development, the PRoW will be retained on its current alignment and remain open during construction. During operation, the short section of the PRoW which travels through the Site will pass through areas set aside for biodiversity improvements, with panels and surrounding fencing significantly set back. Measures to safeguard the amenity and safety of users of the PRoW would be stipulated in a CEMP.
- 6.2.21 In terms of impacts from noise, a Noise Impact Assessment was undertaken by Inacoustic, which identified a number of sensitive receptors in the vicinity of the Site. The Assessment takes account of noise emissions from inverter / transformer stations and from the proposed BESS, concluding that the Proposed Development will give rise to noise levels that are below the measured day and nighttime background sound levels for the area. The overall impact is therefore low and within acceptable levels. The location of the noise generating equipment has been strategically located away from nearby sensitive receptors to avoid any potential impacts, in line with local policy requirements and best practise for solar farm design. Construction noise would be mitigated using Best Practicable Means for any noisier construction activities, with the exact measures set out in, and secured through, the CEMP.
- 6.2.22 Solar arrays themselves do not emit any light and no permanent lighting is proposed. Should lighting be required during construction during the winter months, this will be mobile, downward facing to reduce spill, and limited to areas where working is taking place.
- 6.2.23 In terms of potential impacts from glint and glare, a Glint and Glare Assessment been undertaken by Pager Power. The Assessment concludes that there are no impacts predicted on road safety (including motorists on the new A428) or aviation activity as a result of the Proposed Development. The Assessment identified a number of dwelling receptors within proximity to the Site, and whilst the majority were identified to experience no impact prior to mitigation, it was noted that there is potential for a low impact on Eltisley Manor Nursing Home. The proposed mitigation measures of landscaping to the south (in the form of native hedgerow

planting), will significantly screen views from the ground floor of this property, which is typically the main living space and therefore has greater significance with respect to residential amenity. The effects also coincide with direct sunlight which is a far more prominent light source. Overall, a low impact is predicted on this receptor and therefore further mitigation measures are not required.

- 6.2.24 Potential amenity impacts during the construction phase of development will be minimised using standard mitigation measures, such as wheel washing facilities, measures to control light and noise pollution, route signage and limiting hours of construction. These measures are set out in a Construction Traffic Management Plan (CTMP) which forms part of the Transport Statement, submitted as part of this application. It is anticipated that a Construction Environmental Management Plan (CEMP) will be a condition of any subsequent approval, which will ensure that any other potential adverse impacts during the construction period are appropriately mitigated against. It is noted that unlike many other developers in the sector, the Applicant intends to build, own and operate the Proposed Development themselves. They will be the Principal Contractor during construction and therefore have ultimate responsibility for the proposed implementation of the CEMP.
- 6.2.25 By their nature, solar farms do not produce any odour.

Impact on Heritage Assets and/or their Settings

- 6.2.26 The Site is located in proximity of the designated heritage assets of the scheduled monument of Weald deserted village and the Grade II listed assets of North Farmhouse and Milepost located on Cambridge Road.
- 6.2.27 A Heritage Impact Assessment (HIA), undertaken by Cotswold Archaeology, provides an assessment on the potential physical and non-physical effects of the Proposed Development on the identified heritage assets.
- 6.2.28 In assessing the potential for physical effects on below ground heritage assets, the HIA notes that piling on Site (for the PV panel frames) would result in no material harm to unidentified buried archaeological remains within the wider Site area. Other construction activities (such as cabling and formation of access tracks) are likely to result in greater disturbance to buried archaeological remains.
- 6.2.29 Trial trenching, carried out prior to the submission of this application, identified important buried archaeological remains. As a result of this, four discrete areas have been excluded from the solar development. All three of these areas are located within the parcel to the south of Cambridge Road. Further archaeological work is due to be carried out within the northern parcel of the Site, which will inform the necessity for any further mitigation within this part of the Site. Mitigation options include further 'no dig' zones or the use of non-intrusive foundations for panel frames and other structures.
- 6.2.30 The HIA also assesses the non-physical effects of the Proposed Development. When considering the impact on North Farmhouse, the Assessment concluded that there would be no change (and therefore no harm) to the components that contribute to the asset's importance. There will also be no change to the setting of the asset or the wider agricultural setting of the Farmhouse.
- 6.2.31 While it is identified that the scheduled monument of Weald deserted village has evidential value, in its current form it is almost entirely unintelligible. Given this, it is considered that there will be no effect on components leading to its significance. Changes to the wider setting of the Monument are considered to have no influence on the current experience of the Monument and will not result in any harm.
- 6.2.32 Temporary effects are considered to be possible on the listed milepost to the south of Toseland Road, however these will be limited to the construction phase of development. The laying of

cable will be limited to the northern side of Cambridge Road, this is considered to be sufficient distance from the Milepost to limit any additional effects on its setting.

- 6.2.33 Overall, no adverse effects are predicted and the Proposed Development would therefore cause no harm to the heritage significance of any assets. The policy tests of the NPPF are therefore not triggered and there is no conflict with the provision of Policy LP34 or LP35.

Impact on Biodiversity

- 6.2.34 The Site is not protected for any reasons relating to biodiversity or geodiversity. There are no known statutory designations on the Site or in the immediate vicinity and therefore, in accordance with the preference of Policy LP35, the Proposed Development will avoid any impacts on Ecology. An Ecological Impact Assessment (EclA), undertaken by BSG Ecology has identified a number of habitats located within the Site boundaries. The habitats identified largely relate to bat foraging and bird breeding, specifically Skylarks. Great Crested Newts were also identified within proximity of the Site.
- 6.2.35 The EclA provides a number of recommendations which are detailed within the Assessment to minimise the impact of the development on local ecology, these consist of the following:
- Mammal gaps are installed to the base of security fencing
 - New hedgerow planting contains a variety of native species
 - Tussocky grassland be provided to provide enhanced foraging opportunities for Great Crested Newts, badgers and small animals
 - The provision of off-site Skylark territories
- 6.2.36 The Proposed Development incorporates most of the above as part of the design and layout, however, it is considered that there is not sufficient space within the Site to provide the necessary Skylark territories as mitigation. Therefore, off-site provision is proposed to be discussed with the Council's ecologist as part of the post-submission discussions. The Applicant intends to secure additional land within close proximity of the Site for this purpose. The report identifies that subject to the recommended mitigation measures the Proposed Development has taken all reasonable efforts to avoid, minimise and where appropriate compensate for any potential impacts on ecology and biodiversity.
- 6.2.37 A Biodiversity Metric Calculation, carried out by BSG Ecology has identified that there will be a significant net gain in biodiversity across the Site, this will be achieved through the proposed enhancement of existing hedgerows and the planting of 2km of additional native hedgerow, 3,000m² of tussocky grassland and 1ha of tree planting. BNG associated with the Proposed Development is set out in the EclA and accompanying BNG metric, which is demonstrated to be significantly higher than the mandatory 10%.
- 6.2.38 The above concludes that the Proposed Development is therefore compliant with policy LP35 in respect of biodiversity .

Impact on the Landscape

- 6.2.39 The Site is not protected for its landscape value, is predominantly flat and is screened substantially by existing mature trees and hedgerows along boundaries fronting Cambridge Road. As noted above and within the LVIA, the Site presently benefits from existing natural screening along its boundaries along Cambridge Road. The Proposed Development will reinforce this in areas where the depth of screening is limited or non-existent (namely the BESS parcel). The result of increased landscaping as part of the Proposed Development will have a limited impact in the first year of operation, however, after a 15-year period the proposed landscaping will have become established and the effects on identified receptors will be reduced to a minor level in all cases.

6.2.40 The LVIA concludes that the Site has capacity to accommodate the Proposed Development without long-term unacceptable effects on the landscape character and visual amenity, with the planting proposed providing minor beneficial effects for the Site.

Cumulative Impact

6.2.41 The Proposed Development will be delivered alongside the Black Cat to Caxton Gibbet road improvement scheme, which inevitably presents cumulative landscape impact considerations. Fundamentally, construction of the proposed highway scheme will erode the open nature of the fields to the north of the Site and will essentially isolate the northern part of Site from the remainder or the agricultural unit. It is worth noting that this is a key driver for the landowner in seeking to secure an alternative use for the Site.

6.2.42 Landscaping to be provided as part of the proposed highway scheme has been considered when developing the design of the Proposed Development. Other potential cumulative impacts, such as those from construction traffic or noise, can be managed through the effective implementation of CTMPs and CEMPs for the respective developments.

6.2.43 The Applicant has been engaging with National Highways on the design, timing and construction considerations of the Proposed Development, including with respect to cabling and highway works in and around Toseland Road. Every effort is being made to manage the interface between the two projects and minimise potential cumulative impacts. As such, significant effects are not considered likely.

Summary

6.2.44 In summary, Policy LP35 supports renewable energy proposals whereby potential for adverse impacts can be prevented or made acceptable. In this instance, it is considered that the proposed solar farm and BESS will result in very limited adverse impacts relating to landscape and visual amenity and none in relation to amenity, heritage, biodiversity or the surrounding environment. Any perceived residual impacts should be weighed against the benefits of the scheme. The Proposed Development will result in substantial benefits including the production of 49.9MW of electricity and ability to store energy when needed through the proposed BESS, which will contribute to the Council's goal of becoming carbon neutral by 2040 with less reliance on fossil fuels as a means of producing energy. The scheme also delivers a significant improvement in biodiversity and employment opportunities during construction and operation. The mitigation measures proposed are considered proportionate and satisfactory to address any perceived impacts.

6.2.45 The above demonstrates that the principle of development is acceptable, given the Proposed Development will result in very limited to no adverse impacts or harm on the area. The benefits clearly outweigh the potential impacts. Furthermore, NPPF supports sustainable development and there is a presumption in favour of approving sustainable development without delay where there are no material considerations to indicate otherwise.

6.3 Other Material Considerations

Green Infrastructure/PRoW

6.3.1 Policy LP3 (Green Infrastructure) seeks to protect and enhance existing green infrastructure within the District. The Proposed Development seeks to do this through the retention of all trees and hedgerows across the Site (as set out within the Arboriculture Impact Assessment), this will be enhanced in specific areas where the depth of hedgerows is limited and non-existent. A Landscape Strategy Plan has been provided for the Proposed Development, this includes the planting of 2km of native hedgerow as well as 3,000m² of tussocky grassland and 1ha of tree planting. Overall, there will be a significant improvement to green infrastructure provision at the Site, with secondary benefits for biodiversity and wildlife, as demonstrated through the EclA and supporting BNG assessment.

- 6.3.2 The PRoW will be retained throughout the construction and operational phases of the Proposed Development. There will however be a need for construction vehicles to cross the PRoW at certain times during construction. The following mitigation measures are therefore proposed during the construction phase to minimise effects on the PRoW:
- Speed limit of 10mph
 - Drivers will stop and give-way to any pedestrian they encounter
 - Appropriate signage to be installed along the PRoW to make users aware of construction activity
 - Banksmen will be present to ensure the safe movement of all users
 - The footpath will be kept clear outside of construction hours
 - Any damage to the surface of the footpath will be repaired immediately, following construction the surface will be returned to its original condition
- 6.3.3 During operation, the short section of the PRoW which travels through the Site will pass through areas set aside for biodiversity improvements, with panels and surrounding fencing significantly set back, maintaining the amenity of users of the rights of way network. Enhancement could be provided in the form of new waymarking and interpretive signage in and around the scheduled monument.

Agricultural Land Classification

- 6.3.4 Policy LP10 (The Countryside) seeks to avoid the irreversible loss of the best and most versatile agricultural land (grades 1 to 3a) (hereafter referred to as BMV land) where possible, steering development away from Grade 1 agricultural land unless there are exceptional circumstances where the benefits of the proposal significantly outweigh the loss of land. The policy also sets out a preference for development to occur on agricultural land of a lesser quality (i.e. non BMV land) where it is available, reflecting the requirements of the NPPF. The policy goes on to state that proposals should recognise the intrinsic character and beauty of the countryside and not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others.
- 6.3.5 With regards to the latter part of the policy, as set out in the preceding sections, the proposals are sympathetic to the character and beauty of the countryside and do give rise to impacts that would affect the use or enjoyment of the countryside by others. Climate change is accepted as the single biggest risk to biodiversity and agriculture, which the proposal directly responds to.
- 6.3.6 In terms of agricultural land, an Agricultural Land Classification Report, undertaken by Askew Land & Soil Limited, demonstrates that the majority of the Site is comprised of BMV land (totalling 84.8% of the Site). The remainder of the Site is identified to be grade 3b (12.9%) and other non-agricultural land (2.3%). A table and accompanying plan are provided in the report which set out the findings of the surveys in full, along with commentary on associated planning policy requirements. There is no Grade 1 land present within the Site.
- 6.3.7 In terms of the availability of lower quality agricultural land which could in theory accommodate the development proposals, whilst it is possible to assess the nationwide, countywide, and localised averages for agricultural land classification, this is limited to the use of high-level mapping which does not distinguish between subgrades 3a and 3b (BMV land and non BMV land). Despite this, it is important to note that whilst the Site is above the nationwide (England) average of land within grades 1 to 3 of agricultural land classification (98.9% of the Site compared to national average of 65.1%), it is typical of land found within the District (91% of land between grades 1 and 3) and County (92% of land between grades 1 and 3).

- 6.3.8 Within the locality of the Site (and the PoC to the National Grid), there is an extremely limited amount of land outside of Grades 1 to 3, with the nearest area of Grade 4 agricultural land being located immediately to the west of Gamlingay, approximately 6.5km to the south of the Site. The supporting text of Policy LP 10 notes that 98% of the District is classed as grades 1, 2 or 3 which demonstrates the lack of availability of lower quality agricultural land.
- 6.3.9 Given the point of connection is fixed, locating the Proposed Development such a substantial distance from this point of connection would significantly increase the distance of the cabling route, increasing associated impacts and costs, and reducing substantially the energy output from the Proposed Development. In any case, an Alternative Sites Assessment, carried out as part of this Planning Statement, sought to identify and assess alternative sites within a suitable proximity of the point of connection, and found no suitable sites that meet the required characteristics for this proposal, of agricultural land of a lower quality than that of the Site. The requirements of LP10 (and the NPPF) to locate development on areas of lower quality land where it is available is therefore demonstrated and the policy satisfied.
- 6.3.10 It is also critical, and now widely accepted through the outcomes of recent appeal decisions, to understand that no agricultural land is irreversibly lost or downgraded as a result of the siting of solar panels. The small areas of land affected by fixed structures can be restored to the same grade at decommissioning and so are not lost permanently either. There are also recognised benefits for converting arable land to grassland, as will occur for the majority of the Site, including for soil (organic matter, reduced run-off or erosion, for example) and biodiversity. Potential impacts on soils during construction can be managed through the use of appropriate conditions, requiring a Soil Management Plan. The LEMP would secure the appropriate management of the Site during its 35 years in operation.
- 6.3.11 Given this, policy LP10 which seeks to locate development on areas of lower quality land where it is available, and avoid the irreversible loss of BMV land, is satisfied.
- 6.3.12 Furthermore, it is accepted that Solar Farms have significant public benefits which include but are not limited to:
- The provision of low carbon energy which is central to the economic, social and environmental dimensions of sustainable development set out in the Framework;
 - The BESS which provides a valuable contribution to cutting greenhouse gas emissions, by increasing the opportunity to store energy;
 - The huge demand for renewable energy and renewable energy storage, due to a range of global supply factors and constraints. The UK is in the midst of an unprecedented energy crisis with spiralling energy costs at a time of an also ever increasing cost of living;
 - BESS which supports the influx of intermittent renewable energy to smooth out peak demand and power;
 - Contributions to the UK Government's objectives related to renewable energy generation and zero carbon economy;
 - The use of components which are recyclable, thus enhancing the sustainability credentials of the development;
 - The proximity to the existing grid connection reducing potential for significant energy losses between the panels and the grid;
 - The significant biodiversity enhancements across the;

- The direct employment in the construction phase and further employment created in the management and maintenance of both the solar farm and BESS, in addition to job creation through the supply chain;
- Landscaping which will have a dual benefit of mitigating the visual impact of the development whilst enhancing and providing new wildlife habitats for ecology and biodiversity;
- Storage of electricity which is needed sooner and in larger capacities for meeting net zero carbon targets according to National Grid Future Energy Scenarios.
- The fact that the development is proposed for a temporary period of 35 years after which it could be removed, and the site restored. Any impacts are therefore temporary and fully reversible. During this time, the soil will regenerate and improve the nutrients and minerals within the soil through the non-agricultural practice.
- That there are no technical reasons why the Proposed Development cannot look to be supported.

6.3.13 It is understood that the above cumulatively provides the public benefits sufficient to overcome the temporary loss of any BMV agricultural land for the temporary 35-year period. After this time the land will be reverted in its uplifted state back to agricultural use.

6.3.14 It has been demonstrated above that the proposal will not adversely affect the character and tranquillity of the countryside and will ensure that it will not give rise to impacts that would reduce opportunities for others to use and enjoy the countryside, including for wildlife. The proposal is therefore compliant with Policy LP 10 and should look to be supported.

Flood Risk

6.3.15 As noted above, the Site is located entirely within Flood Zone 1 meaning that it is at low risk of flooding. However, due to the size of the Site being over 1 hectare a Flood Risk Assessment (FRA) has been carried out by PFA consulting. The FRA notes that the majority of the site is at low risk of flooding from all sources.

6.3.16 Runoff from the solar arrays will be to the ground directly beneath and will infiltrate the ground at the same rate as the existing greenfield rate.

6.3.17 Interception swales will be used to manage surface water runoff on the Site, discharge from these swales will occur via evaporation, infiltration and evapotranspiration. This is considered an appropriate drainage strategy given the temporary nature of the proposed solar farm that does not increase flood risk elsewhere outside of the Site.

6.3.18 It is therefore considered that the Proposed Development is compliant with Policy LP5 (Flood Risk) of the Local Plan.

Trees

6.3.19 An Arboricultural Impact Assessment and Tree Survey, undertaken by Barton Hyett Associates notes that no trees or hedgerows will be removed in their entirety as a result of the Proposed Development.

6.3.20 The Assessment identifies trees on Site to be a mix of Category A, B and C with three TPOs within the Site boundary. These will all be preserved in their entirety.

6.3.21 An English Oak, located within the Site has been identified to require an appropriate buffer to accommodate for the route protection area, this has been provided and is illustrated within the Site Layout Plan.

6.3.22 Therefore, there will be no impact on any trees or hedgerows within the Site boundary with all being retained. This is in compliance with Policy LP31 (Trees, Woodland, Hedges and Hedgerows) of the Local Plan.

Highways

6.3.23 A Transport Statement, undertaken by tpa, identifies that all parcels will be accessed via existing agricultural access points with limited widening required to accommodate suitable visibility splays.

6.3.24 Entrance and egress from each of the parcels located on the A428 will be through a left in left out movement with adequate turning space within the Site for HGVs as well as emergency vehicles.

6.3.25 The construction phase of development will last for a period of approximately 30 weeks and will result in an average of 6 to 7 HGV movements per say as well as car and shuttle bus trips for workers, it is not anticipated that this will have any impact on the operation of the local highway network. It is therefore considered that the Proposed Development is acceptable in highways terms.

6.3.26 In light of the above, it is considered that there are no material considerations present to indicate as to why the Proposed Development should not otherwise be approved.

7 Alternative Sites Assessment

7.1 Introduction

- 7.1.1 As noted above and within the accompanying Agricultural Land Classification Report, the majority of the Site (84.8% of the Site area) is located on BMV land (ALC grades 1 to 3a).
- 7.1.2 The Huntingdonshire Local Plan states within Policy LP10 (The Countryside) that development proposals should seek to be located on land of lower agricultural value where it is available, with a preference to avoid the irreversible loss of the best and most versatile agricultural land where possible.
- 7.1.3 Whilst this Policy, nor the pre-application advice received prior to the submission of this application, states the need for an Alternative Sites Assessment to demonstrate the suitability of a Site, it is considered that it is appropriate in this instance to provide one in order to justify the location of the Proposed Development and that all reasonable alternatives have been considered.
- 7.1.4 National Policy Statements (specifically EN-1 and EN-3) provide planning guidance for developers of nationally significant energy infrastructure projects. EN-1 forms the overarching National Policy Statement (NPS) and EN-3 relates specifically to renewable energy infrastructure. Both can be considered as a material consideration in decision making on planning applications.
- 7.1.5 In relation to the use of agricultural land for, Paragraph 5.11.12 of EN-1 seeks to minimise impacts on BMV land through the preferable use of land that is of poorer quality.
- 7.1.6 EN-3 also refers to a preference for solar farm developments to be located away from BMV land, albeit Paragraph 2.10.29 states that this should not be a predominating factor in determining the suitability of the Site. Paragraph 2.10.31 goes onto require applicants to justify their choice of Site where it is located within BMV land.

7.2 Locational Requirements of Solar Farms and BESS

- 7.2.1 Within EN-3, the factors that should influence Site selection are discussed in paragraphs 2.10.18 to 2.10.48, these are summarised in the table below:

Table 7.1: Locational requirements of solar farms

Factor	Reason
Irradiance and site topography	Irradiance is the energy received from the sun, the effect of which can be reduced by the topography of a site, southward facing sites with a good elevation and surrounding topography are optimal for solar farms.
Network connection	The capacity of the local grid network to accommodate the output from the proposed solar farm is critical to the schemes commercial feasibility, in addition to this the distance from the solar farm to the point of connection a site should be based nearby to available grid export capacity.
Proximity of site to dwellings	Residential areas have more sensitive receptors to glint and glare and the visual impacts of solar farms, therefore solar

	developments are considered more appropriate in more remote locations.
Agricultural land classification and land type	It is recognised that large scale solar farms will inevitably use some agricultural land, this should preferably be brownfield land or none BMV land. Where possible it should be considered whether the solar farm can be co-located with the existing agricultural use or an alternative use such as onshore wind or battery storage.
Accessibility	Access routes to the proposed solar farm will need to be considered for the construction and operation of the scheme over its lifespan.
Public rights of way	Applicants are encouraged to design proposals for solar farms to allow for the retention of existing public rights of way whilst minimising the visual impacts on the users of any identified PRow.
Security and lighting	Solar farm proposals should include security measures by the way of fencing, electronic security, CCTV and lighting, the impact of which on local residents will also need to be assessed.

7.2.2 In addition to the locational requirements of solar farms noted within EN-3, the following aspects are considered crucial to the operation and commercial viability of solar farm developments:

Grid Connection

7.2.3 Solar farms require connection to the electricity grid. This connection requires an agreement with the Distribution Network Operator (DNO). The viability of this connection is critically dependent upon five factors:

1. The existence of spare and available capacity within the grid network to accept the electricity.
2. The technical and available capacity of a nearby grid connection point/ substation.
3. Proximity to a Point of Connection (PoC) taking account of cable route and associated costs.
4. Connection costs, particularly relating to any necessary upgrades or reinforcements to the electricity network.
5. Timescales relating to the connection date.

7.2.4 The electricity grid is constrained and viable grid connections for renewable energy projects are increasingly scarce thus the Applicant works closely with the DNO to identify areas with available capacity. The site sieving process is run in tandem with this. All of the factors included in the methodology below and table above are considered during this process.

- 7.2.5 Once a site is identified and the Applicant has confirmation from the DNO that the network has capacity, the Applicant applies to the DNO for a PoC. Once an application to the DNO is made and accepted, the Applicant is tied to the relevant PoC. Therefore, any possible suitable sites need to be within an appropriate distance to it.
- 7.2.6 Given the above information, this ASA is based around the applicant's agreed PoC with the DNO. It demonstrates that there are no more preferable sites than the Proposed Site within a similar vicinity of the PoC.

Distance from Grid Connection

- 7.2.7 To ensure the cost of electricity generated is as low as possible, all solar and other forms of renewable energy should be located within a reasonable distance from the PoC. It is preferable that solar farms be located as close as possible to the PoC for commercial and practical reasons which are set out as follows:
- The closer to the grid connection is to the solar farm, the more effective the energy transfer is due to less energy lost through voltage drop (i.e. increased efficiency of transmission).
 - The further away from the PoC the more that must be spent on the connection cabling, which has a significant impact on the viability of the project; and
 - A longer cable route results in more disturbance locally.
- 7.2.8 The Applicant has an agreed offer from the DNO with a PoC allocated to be a T-off connection to the overhead powerline that traverses the northern parcel of land, located along Toseland Road where the BESS will be located alongside a new substation required to be capable of converting the voltage to the 132kv required for the overhead powerlines.
- 7.2.9 From the PoC, located along Toseland Road, to the furthest transformer proposed within the site (located within the parcel of land to the south of Cambridge Road) is a cabling route of 2.7km. This cabling route is to travel under the new dual carriageway proposed, Cambridge Road and Toseland Road and offers the most efficient route given existing constraints in order to maintain the energy produced by the solar farm.

Agricultural Land Classification

- 7.2.10 As noted above, Policy LP10 seeks to locate development in the countryside on none BMV land, this is supported by the provisions set out in EN-1 and EN-3 of the National Policy Statements.

Other Land Use Considerations

- 7.2.11 There are other varied land use matters which dictate where a solar farm and BESS can be located.
- 7.2.12 Firstly, any potential site must be able to host a facility of the same size, with similar associated construction and grid connection costs. Whilst the total site area is 78.45 hectares, the area occupied by the Proposed Development is 53 hectares (this includes the panels, tracks, BESS compound and other infrastructure), this is due to the need for archaeology exclusion areas and root protection areas throughout the site. Thus, any alternative site would need to be of a minimum size of 53 hectares to accommodate the Proposed Development.
- 7.2.13 Other land use factors need to be considered including ease of build (i.e. would have minimal disruption on local residents including the cabling works required).
- 7.2.14 Solar farms are more suitably located within less built-up areas as they are less likely to compete as heavily with other land uses for capacity from/ to the National Grid. Large industrial estates are very intensive in terms of energy consumption, meaning that points of

connection close to large industrial areas may have other wider network factors such as voltage violations which could make it an inappropriate location for development.

- 7.2.15 When located nearby to residential developments, there is potential for the impacts of solar farms to increase. This is due to an increase in the proximity to sensitive receptors such as dwellings which could be subject to an increase in glint and glare, this means that, in order to be acceptable, extensive screening would be required. In addition to this, BESS have an increased fire risk compared to the Solar PV panels and other renewable development (albeit this is negated by an extensive fire prevention system within each of the BESS containers). Nevertheless, this risk is more easily mitigated against, and less likely to cause any impact, when located in a remote location that is also easily accessible by road.

Environmental and Physical Constraints

- 7.2.16 Solar projects must also be in areas where there are fewer construction hazards. Factors such as topography, flood risk, existing utilities and access can all contribute to this and thus locations are selected very carefully to ensure there are little to no risks during both construction and ongoing maintenance of the project.
- 7.2.17 There is also preference to locate such projects outside of statutory designations such as Areas of Outstanding Natural Beauty (AONB's), Green Belt, National Parks, Site of Special Scientific Interest (SSSI's), Ramsar sites and away from designated sites and assets such as conservation areas and listed buildings.
- 7.2.18 As such, there are a range of locational requirements that dictate where a solar farm can be located, and which will inform the assessment of alternative sites.

Landowner

- 7.2.19 To be considered as a suitable alternative site, a site must be available to the developer. It should be within the existing landholding of the landowner or available to the developer on the open market. It is important to note that aside from the above constraints, a landowner willing to enter into a Land Lease Agreement for the term of the solar farm (35 years) is – obviously – a key constraint.

7.3 Methodology

- 7.3.1 There is no guidance at a local or national level as to how an ASA should be approached, or methodology that should be followed. There is however, a generally accepted approach which follows the following steps:
1. Defining electricity distribution network grid connection opportunities and identification of the study area;
 2. A sieving exercise based on the agricultural land classification of areas within proximity to the PoC
 3. Formulation of 'short-listed' sites based on agricultural land quality
 4. Assessment of the 'short-listed' sites based on the locational requirements and agreed parameters set out above.
- 7.3.2 As noted in Paragraph 7.1.3 of this Statement, there has been no requirement set for the provision of an ASA with the Council. Therefore, the proposed methodology has not previously been agreed with the Council, however it is considered appropriate given the context of the site and its surroundings.

7.4 Assessment

7.4.1 This section of the ASA follows the methodology outlined in Section 7.3.

Stage 1 - Defining electricity distribution network grid connection opportunities and identification of the study area

7.4.2 The PoC in this instance has been allocated to the applicant by the DNO, it is not considered necessary to assess alternative points of connection given that this is a T-off connection from the overhead line. Due to the frequency of pylons along this route, it is likely that an assessment of alternative points of connection would result in the same conclusions.

7.4.3 As noted in Paragraph 7.2.9 above, the distance of the cabling route from the proposed substation to the transformer located in the southern parcel of the site is 2.7km. The search area should therefore be applied to an area of 2.7km, however for the basis of this Assessment an additional buffer of 1.3km has been applied to create a search area of 4km from the PoC. This increased distance from the PoC would not be considered to significantly prejudice the output capacity of the Proposed Development. The search area is illustrated in Figure 7.1 below.

Figure 7.1: Search area for alternative sites



Stage 2 - A sieving exercise based on the agricultural land classification of areas within proximity to the PoC

7.4.4 As Policy LP10 (The Countryside) seeks to locate development on land of lower agricultural quality, this will form the basis for identifying alternative sites within the search area.

7.4.5 Presently, the site comprises of the following agricultural land classifications:

Table 7.2: ALC of the Proposed Development site

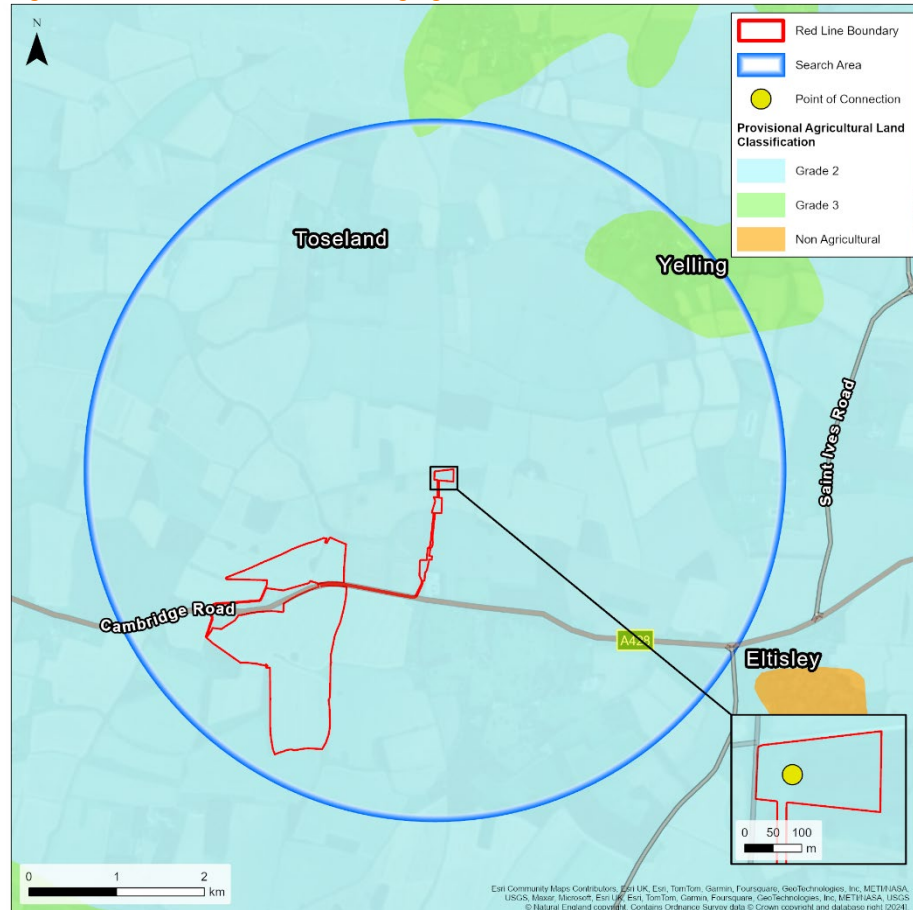
ALC Grade	Area (Ha)	Area (%)
Grade 1 (Excellent)	0	0
Grade 2 (Very Good)	24.4	31.1
Subgrade 3a (Good)	42.2	53.7
Subgrade 3b (Moderate)	10.1	12.9
Grade 4 (Poor)	0	0
Grade 5 (Very Poor)	0	0
Other Land / Non-agricultural	1.8	2.3
Total	78.5	100

7.4.6 The first requirement in identifying potential alternative sites for development would be to remove any land above Grade 3a from the search area. However, it is not possible to determine without intrusive evaluation whether Grade 3 land (as indicated on publicly accessible mapping) falls within Grade 3a (BMV land) or Grade 3b.

7.4.7 Given this, all Grade 3 land has therefore been considered potentially suitable for development.

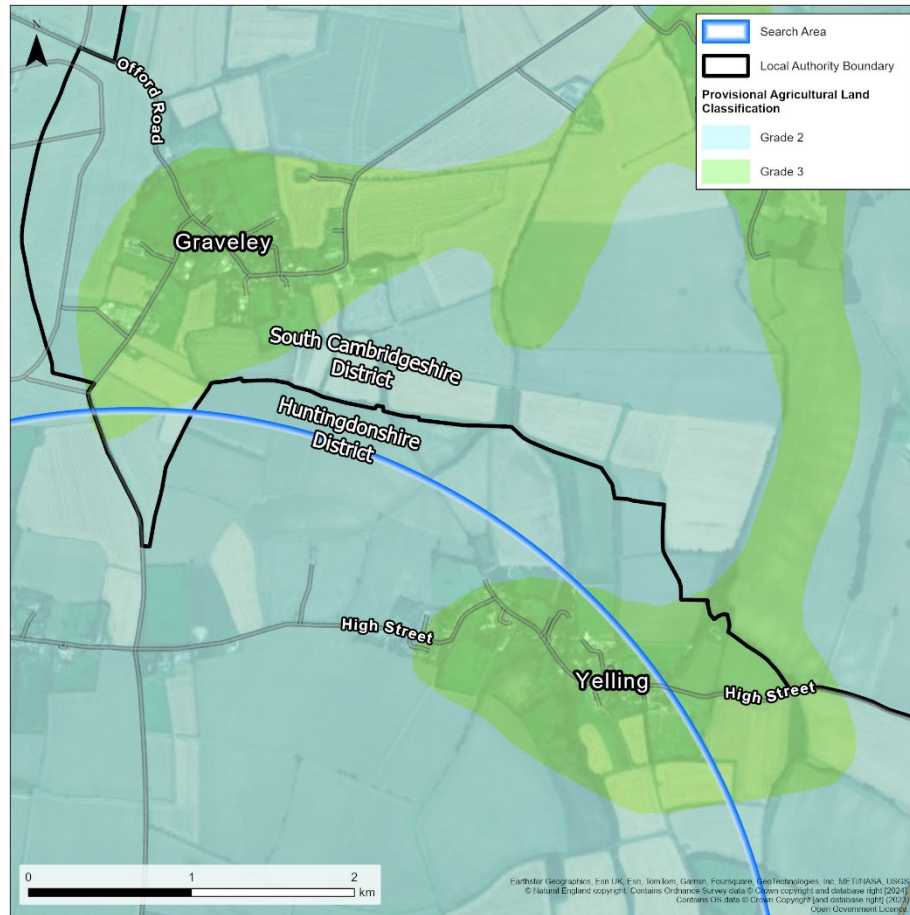
7.4.8 Figure 7.2 below identifies the high level agricultural land classification of all land within the 4km search area:

Figure 7.2: 4km search area including agricultural land classification



7.4.9 As is illustrated within Figure 7.2, the majority of land within 4km of the PoC is ALC Grade 2 (Very Good). There is however a small area to the south of Yelling that is within Grade 3, as is shown in greater detail in Figure 7.3 below:

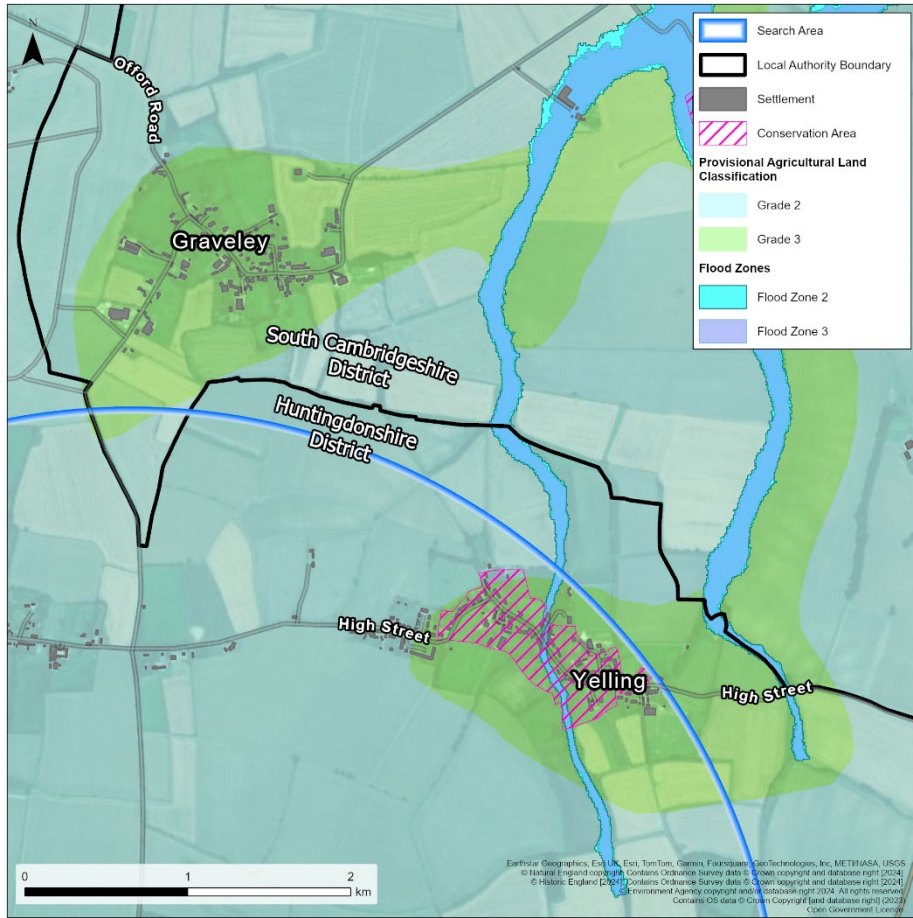
Figure 7.3: Area of Grade 3 agricultural land within search area



7.4.10 As noted in Section 7.2 above, it is necessary to locate solar farms in areas away from any heritage, ecological and land based designations. In this instance, much of the land identified to be grade 3 agricultural land surrounding Yelling is located within the Yelling Conservation Area (as is shown in Figure 7.4).

7.4.11 Any development proposals within or adjacent to the Yelling Conservation Area would be assessed against Policy LP34 (Heritage Assets and their Settings) of the Local Plan. This Policy requires proposals within the setting of a Conservation Area to preserve and enhance the character of the Conservation Area.

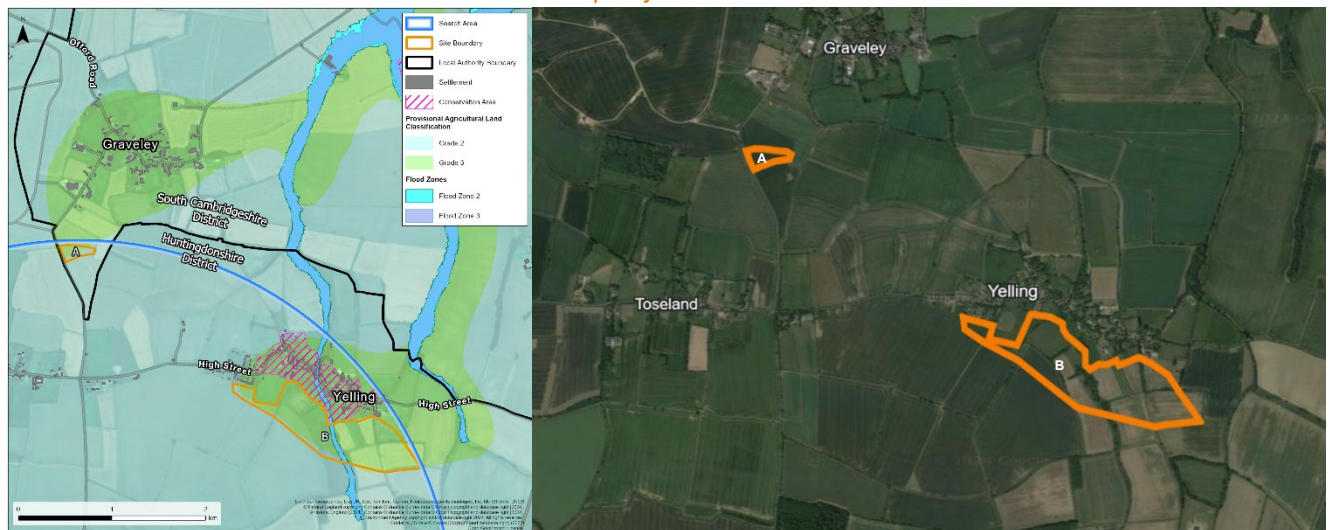
Figure 7.4: Area of Grade 3 agricultural land within search area and identified constraints



Stage 3 - Formulation of 'short-listed' sites based on agricultural land quality

7.4.12 As is shown by Figure 7.4 above, within the search area there are areas of lower agricultural value than the Proposed Development site. These are located to the north and south of Yelling as well as to the south of Graveley. These are identified in Figure 7.5 below:

Figure 7.5: Shortlisted sites based on agricultural land quality



7.4.13 The two sites, identified in Figure 7.5 above as Site A and Site B form the 'short-listed' alternative sites of this assessment due to their lower agricultural land classification. The two sites identified are described below.

Site A – Land to the South of Graveley

7.4.14 This site is located approximately 650 metres to the south west of Graveley and measures c.1.55 hectares. The site is not subject to any heritage ecological or land-based designations however only just falls within the identified 4km search area. The Grade 3 land does expand northwards, however, is intersected by the built-up area of Graveley which limits any potential for an expansive solar scheme. The site is also outside of the Huntingdonshire District, being within the authoritative boundary of South Cambridgeshire District Council.

Site B – Land to the South of Yelling

7.4.15 Site B is located immediately adjacent to the south of Yelling and borders the Yelling Conservation Area. The site measures approximately 28.09 hectares and is made up of several agricultural fields. The site is bisected by a beck which is within Flood Zone 3 and therefore at high risk of flooding. There is potential for the site to expand northwards of Yelling, however this would be beyond the 4km search area that is considered viable in this case for a cabling route to the PoC, a northwards expansion of the site would also take it outside of the Huntingdonshire District area.

Stage 4 - Assessment of the 'short-listed' sites based on the agreed parameters

7.4.16 Two alternative sites have been identified and short-listed as part of this exercise; it is now necessary to make an assessment of these sites as to their suitability to provide viable alternative site to that of the Proposed Development site. There are a number of criteria that are considered as fundamental for an alternative site to be considered suitable for a solar development of the same scale as that proposed, these are as follows:

- Minimum site area of 53 hectares
- Is of ALC of Grade 3 or below
- Have sufficient access for construction and management
- Not be within statutory or non-statutory designated sites of ecological, heritage or landscape importance, such as AONB's, Special Protection Areas (SPA's), SSSIs or World Heritage Sites;
- Free of landscape designations or visual amenity impacts that cannot be appropriately mitigated;
- Outside of an area which is predominantly in a high flood risk zone or an area historically prone to flooding owing to safety risks associated during the operational phase;
- Topographically advantageous land to limit the need for earthworks;
- Land that is available for development, with no other planning applications or permissions over it, and land that is not competing for use for higher-value developments such as residential or commercial; and
- Land that is not in proximity to large built-up residential areas or other sensitive receptors where construction or landscaping impacts cannot be managed with appropriate mitigation.

7.4.17 Table 7.3 below seeks to provide an assessment of both identified alternative sites against the criteria outlined above:

Table 7.3: Assessment against locational requirements criteria

Criteria	Site A	Site B
Minimum site area of 53 hectares	1.55 hectares	28.09 hectares
Is of ALC Grade 3 or below	Grade 3 ALC	Grade 3 ALC
Have sufficient access for construction and management	Accessible from Toseland Road, however there is no existing access to the site	There is existing access to the site from Yelling High Street, albeit this runs along a PRow.
Not be subject to any heritage, ecological or land-based designations	There are no designations within or adjacent to the site	Yelling Conservation Area is located directly to the north of the site, any development of this site would have a significant adverse impact on the setting of the Conservation Area
Free of landscape designations	There are no landscape designations within or adjacent to the site	There are no landscape designations within or adjacent to the site
Outside of high-risk flood zone areas	The site is entirely within Flood Risk Zone 1 (low risk of flooding)	The site is bisected by a beck running through the centre of the site, the beck is within Flood Risk Zone 3 (high risk of flooding). This area of higher flood risk measures approximately 0.6 hectares and represents 2% of the site that would likely be undevelopable or require extensive mitigation.
Topographically advantages	The site is entirely flat and open	From west to east, the site has a varied topography, sloping downwards to the beck at the centre of the site before a steep incline to the east of the site
Land is available with no other planning permissions over it	There is no planning history associated with the site	There is no planning history associated with the site
Land not close to sensitive receptors	Whilst not close to any sensitive receptors, the site has limited screening meaning that there is potential for glare on users of Toseland Road.	The site is located immediately adjacent to the built form of Yelling and is within 25 metres of residential dwellings. There is significant potential for an impact on these dwellings, however there is existing extensive screening to the north of the site which does act as screening of the site from sensitive receptors.
<p>Key – Compliance with criteria:</p> <p> Relates well to criteria</p> <p> Relates reasonably well to criteria</p> <p> Relates poorly to criteria</p>		

7.4.18 As is noted within Table 7.3, neither of the sites identified relate well to the criteria in their entirety. Both sites fail to meet the land area required for a solar farm of this scale with Site B (the larger of the two) fulfilling just 53% of the size required to produce 49.9 MW of solar energy. In addition to this, the site's proximity to Yelling Conservation Area and the built-up area of the village would have a significant adverse impact. Given this, neither of the identified alternative sites are considered appropriate for solar development of the scale proposed.

7.5 Summary

7.5.1 This Alternative Sites Assessment has been provided to justify the choice of application Site. In this instance, the proposed solar farm has been allocated a point of connection along Toseland Road, this will be a T-off connection to the national grid and will be supported by the Proposed Development of a new substation on site.

7.5.2 The existing cabling route to be provided between the PoC and the furthest transformer (located within the southern parcel of the site) measures 2.7km. It is however considered that a cabling route of up to 4km would be appropriate and result in minimal losses of energy. A 4km search area has therefore been identified to demonstrate some flexibility throughout this assessment.

7.5.3 Policy LP10 (The Countryside) of the Local Plan seeks to locate development away from the best and most versatile agricultural land, it is necessary to identify the ALC of land within the search area. Given that the Site is considered mostly as BMV land, it was required to search for land within the search area that is of Grade 3 land and below.

7.5.4 This exercise identified two potential alternative sites, Site A to the south of Graveley and Site B to the south of Yelling. An assessment against a number of criteria required to bring forwards a solar farm of the scale proposed found that neither site was appropriate. The predominant reasoning for this being that there is no site of an appropriate size to provide the 53 hectares of land, this is the area considered the minimum to provide the solar panels and infrastructure required to generate 49.9MW of solar energy.

7.5.5 Therefore, the outcome of this Alternative Sites Assessment has been that neither of the identified sites are suitable for the development proposed.

7.5.6 The Proposed Development Site is within close proximity to the PoC and is suitably located in an area that is not subject to any designations and is located away from any sensitive receptors. It is therefore considered, in light of any alternatives, that the Site is the most suitable for the development proposed within the identified 4km search area from the PoC.

8 Summary

- 8.1.1 In summary, the NPPF supports a transition towards the use of renewable energy infrastructure, this is echoed by policies within the Huntingdonshire District Local Plan. Namely, Policy LP35 supports renewable energy developments provided that there are no adverse impacts and any that may occur as a result of the development proposed can be mitigated against appropriately.
- 8.1.2 It is considered that the proposed 49.9MW solar farm and 50MW BESS is compliant with the provisions set out in Policy LP35 in terms of its insignificant impact on amenity, heritage assets, biodiversity and landscape, subject to appropriate mitigation as detailed within the accompanying reports and plans. It is therefore considered that the Proposed Development will not result in any adverse impacts, furthermore, demonstrating how the principle of development for a solar farm and BESS is acceptable in this location. The development also complies with Policy LP 10, whilst BMV land cannot be avoided the scheme has significant public benefits which provide the exceptional circumstances required by the Policy to permit the development.
- 8.1.3 Given the acceptability of the Proposed Development in terms of principle of development, it is important to assess other material considerations that may be given weight in the planning balance. The Proposed Development seeks to take account of the existing constraints including archaeology and the PRoW running through the Site, the scheme creates an exclusion zone around the route of the PRoW, resultantly having an insignificant impact on users of the PRoW.
- 8.1.4 Additionally, the Site is not currently subject to a high risk of flooding, the Proposed Development will not increase this risk and subsequently is considered acceptable in terms of flood risk. As noted above, the majority of the Site is located within land considered as 'best and most versatile agricultural land' (land identified as Grades 1 to 3a), however given the reversible nature of the Proposed Development and lack of land nearby to the point of connection of a lesser quality of agricultural land it is considered that the Site is generally appropriate for the purpose of the Proposed Development. It is therefore considered that the Proposed Development is acceptable in terms of its compliance with policies of the Local Plan.
- 8.1.5 The suite of assessments and reports submitted as part of the planning package provides sufficient information and evidence to support statements made throughout this Planning Statement.
- 8.1.6 Essentially, the Proposed Development represents sustainable development in a suitable location that will provide a substantial amount of energy whilst contributing to the Council's goal of becoming carbon neutral by 2040.
- 8.1.7 Based on the evidence and justification set out within this Planning Statement and supporting evidence, and in accordance with the NPPF, it is respectfully requested that this application is approved without delay.