

# Planning Statement (inc. Green Belt Assessment)

## Six Oaks Renewable Energy Park



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# 1. Introduction

## Purpose of Statement

- 1.1 This Planning Statement (inc. Green Belt Assessment) has been prepared by ELG Planning to support a full planning application for a solar array and Battery Energy Storage System (BESS) on land between the A14 and A11 trunk roads in East Cambridgeshire.
- 1.2 The application is supported by a range of supporting reports, an Environmental Statement and information dealing with the technical matters arising from the proposals.

## Structure of Statement

- 1.3 This statement is structured as follows:

**Section 2** analyses the context of the site.

**Section 3** sets out the relevant planning policy context.

**Section 4** describes the development proposals.

**Section 5** assesses the key planning issues relating to the proposed development, including in the context of the adopted development plan and NPPF, as well as any other material considerations.

**Section 6** draws conclusions on the overall findings of the statement

## 2. Site Context

### Local Context

- 2.1 The application site is located on an area of land between the A14 and A11 to the west of Cambridge as shown on Figure 1 below.

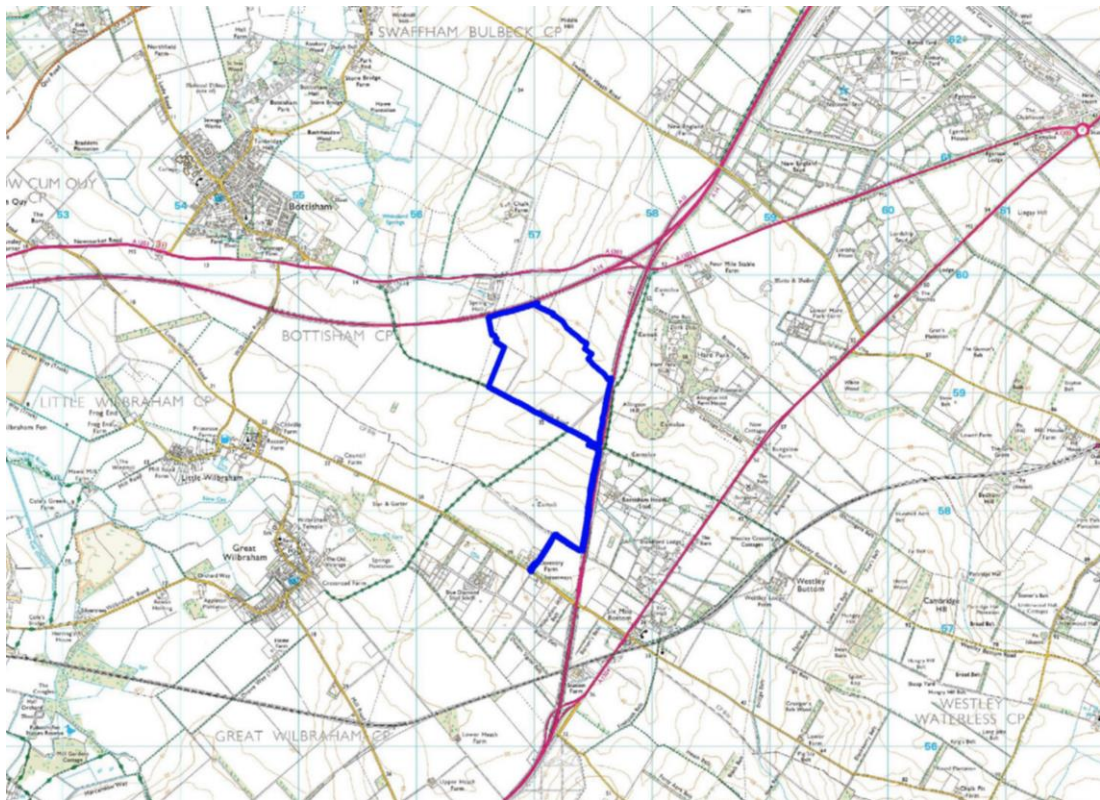


Figure 1: Site Location Plan

- 2.2 The village of Bottisham is 1.3km to the north-west, Little Wilbraham is 1.6km to the south-west and Great Wilbraham is 1.9km to the southwest of the proposal. The site lies within East Cambridgeshire District Council with the site access crossing into South Cambridgeshire. The application site extends to approximately 76.1ha (189 acres) and is predominately in agricultural use.

## Designations & Constraints

- 2.3 There are no statutory historic or environmental designations within the application site itself but there are a number of designated heritage assets within the wider study area. The site is however located within the Green Belt.

## Planning History

- 2.4 The development proposals were subject to an EIA screening request in January 2022.

22/00072/SCREEN - SCREENING OPINION - Installation of ground mounted solar array and Battery Energy Storage System. EIA required.

- 2.5 As such, the planning application is supported by an Environmental Statement.

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

### 3. Development Proposals

3.1 The proposals include the development of:

- solar photovoltaic panels with a total export capacity of up to 49.9MW up to 3m high
- panel frames with ground anchors
- new access track, up to 4.5m wide
- approximately 232 inverters mounted to the rear of the panels
- nine transformer units
- 1 customer cabin
- a perimeter fence, up to 1.8m tall
- cables and conduits
- CCTV cameras on 2m posts
- a 1.1ha BESS and substation compound with 28 containerised battery units, 28 attendant PCS modules and 14 switchgear containers
- a substation compound
- a temporary construction compound with welfare, storage and office facilities.

3.2 It is anticipated that the proposed development would be generating electricity for a period of 40 years. The proposed solar farm will have an installed AC capacity of up to 49.9MW and the panels will be ground mounted to a maximum height above ground of 3 metres. The BESS would have a capacity of up to 50 MW with a duration of 2 hours.

3.3 It has been predicted that the proposed solar farm will generate an annual average of approximately 48 700 000kWh (net) of electricity (to 3 S.F). It is predicted that the

renewable energy park at this site would offset the equivalent annual electricity needs of approximately 10,730 Cambridgeshire homes (based on average domestic consumption per household of 4 540kWh p.a., (DBEIS 2022)).

- 3.4 From the displacement of electricity generated from fossil fuels, the proposed development would offset the emission of a significant quantity of pollutants, particularly carbon dioxide, into the atmosphere. This reduction in emissions would contribute to the national legislation of achieving zero net carbon emissions by 2050 and international reductions required under the legally binding obligations of the Climate Change Act 2008 and International Paris Agreement 2016.
- 3.5 Electricity generated using a solar system varies throughout daytime hours according to changes in irradiance (or light levels). The BESS will therefore complement this generation. The battery serves a number of purposes, including stabilising the generation as well as operating independently of the solar farm to provide energy during times of peak demand or system frequency instability.

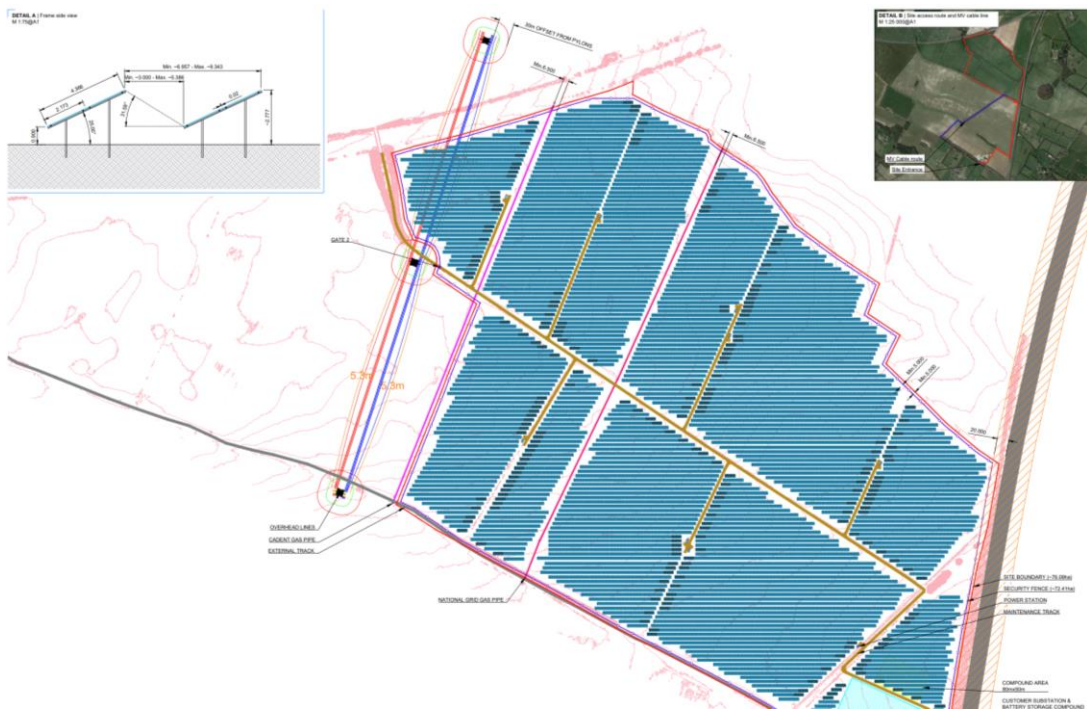


Figure 2: Proposed Layout Plan

- 3.6 Once operational there are very limited impacts from the development in terms of noise or traffic movements etc. and the use is essentially temporary.



## 4. Planning Policy Context

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 indicates that the statutory Development Plan will continue to be the starting point for the consideration of planning applications for the development or use of land, unless material considerations indicate otherwise.

4.2 This section of the statement identifies the Development Plan in force for the area in which the application site is located and also sets out the Development Plan policies of relevance to the assessment of the current application proposals. The key material considerations relevant to the determination of the application are also highlighted.

### Development Plan

4.3 For the purpose of section 38(6) of the Planning and Compulsory Purchase Act 2004, the currently adopted Development Plan comprises:

- East Cambridgeshire Local Plan (adopted 2015)
- South Cambridgeshire Local Plan (adopted 2018)
- Cambridgeshire & Peterborough Minerals and Waste Local Plan (adopted 2021)

## East Cambridgeshire District Local Plan (2015)

- 4.4 The application site is located within the Green Belt as shown on the adjacent extract (figure 3) from the local plan proposals map. It is not subject to any other planning policy designations.

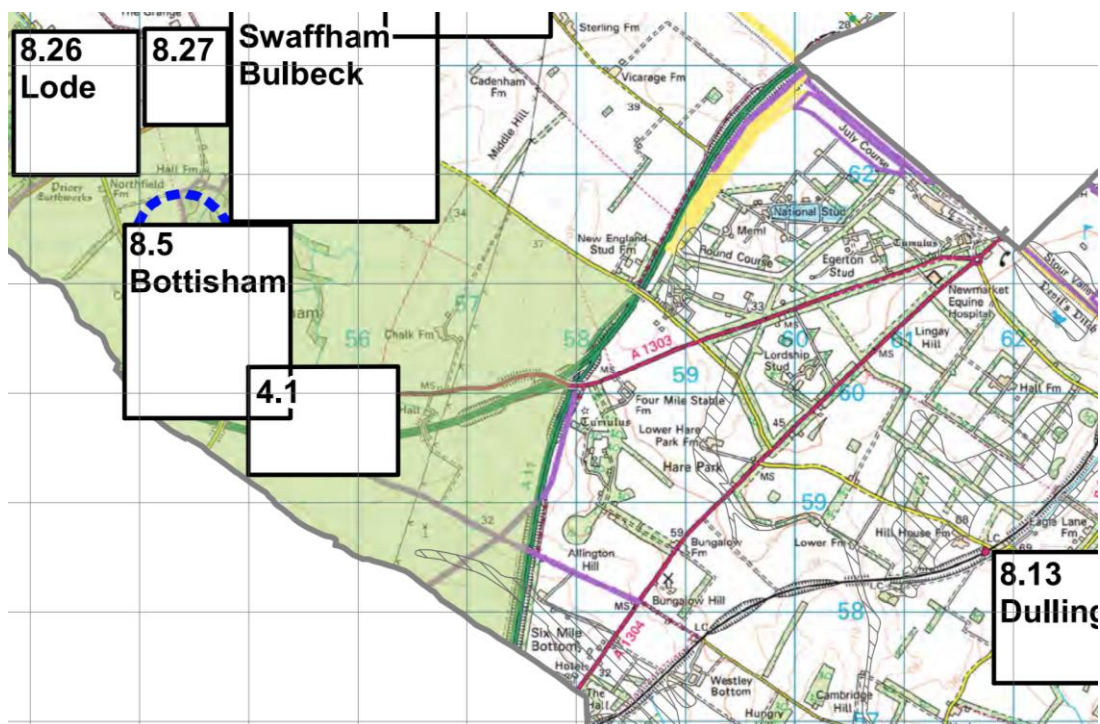


Figure 3: Extract Local Plan Proposals Map

- 4.5 The following policies from the East Cambridgeshire District Local Plan are of relevance to the consideration of the planning application:

- Policy ENV 1: Landscape and settlement character
- Policy ENV 6: Renewable energy development
- Policy ENV 7: Biodiversity and geology
- Policy ENV 8: Flood risk
- Policy ENV 9: Pollution

- Policy ENV 10: Green Belt
- Policy ENV 12: Listed Buildings
- Policy COM 7: Transport impact

### **South Cambridgeshire Local Plan (2018)**

4.6 The following policies from the South Cambridgeshire Local Plan are of relevance to the consideration of the limited part of the application site which falls within the district;

- Policy S/4: Cambridge Green Belt
- Policy CC/2: Renewable and Low Carbon Energy Generation
- Policy NH/8: Mitigating the Impact of Development In and Adjoining the Green Belt

## **Material Considerations**

### **National Planning Policy Framework (NPPF)**

4.7 The National Planning Policy Framework (“NPPF”) updated in July 2021 is a significant material consideration in the consideration of planning decisions. This was a revision to the NPPF that was originally published in March 2012. Paragraph 2 of NPPF confirms that development which accords with the Development Plan should be approved unless material considerations indicate otherwise.

4.8 The NPPF confirms that the purpose of the planning system is to contribute towards the achievement of sustainable development and, in order to achieve this purpose, the planning system has three overarching objectives, which are interdependent and need to be pursued

in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) *an economic objective* - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) *a social objective* – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) *an environmental objective* – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.’

4.9 The NPPF introduces a presumption in favour of sustainable development. For decision making this is defined in paragraph 11 as approving development proposals which accord with the development plan without delay; and where the development plan is silent, absent or relevant policies are out of date, permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits of specific policies of the NPPF that indicate that development should be restricted.

4.10 Section 13 of the NPPF sets out the Government’s policy guidance in the Green Belt. The paragraphs relevant to the development proposals are set out below:

*147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.*

*148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*

*151. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. **Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.***

- 4.11 Section 14 of the NPPF outline policy guidance on meeting the challenge of climate change, flooding and coastal change.

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

- a) *provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*

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

*158. 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 used in identifying suitable areas.*

4.12 Section 15 of NPPF relates to conserving and enhancing the natural environment.

*174. Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*

- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

*180. When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless*

*there are wholly exceptional reasons and a suitable compensation strategy exists; and d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.*

- 4.13 Section 16 relates to conserving and enhancing the historic environment and sets out the government's policies on these matters. Paragraph 195 of NPPF states that LPAs should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

#### **Planning Practice Guidance (PPG)**

- 4.14 The Planning Practice Guidance (PPG) is an online resource which provides guidance on how the governments planning policies in the NPPF should be applied. Of relevance to the consideration of the development proposals is the following guidance (Paragraph: 013 Reference ID: 5-013-20150327).

What are the particular planning considerations that relate to large scale ground-mounted solar photovoltaic farms?

*"The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.*



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

- *encouraging the effective use of land by focussing large scale solar farms on previously developed and non agricultural land, provided that it is not of high environmental value;*
- *where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays. See also a speech by the Minister for Energy and Climate Change, the Rt Hon Gregory Barker MP, to the solar PV industry on 25 April 2013 and written ministerial statement on solar energy: protecting the local and global environment made on 25 March 2015.*
- *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 (see guidance on landscape assessment) and on neighbouring uses and aircraft safety;*
- *the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;*
- *the need for, and impact of, security measures such as lights and fencing;*
- *great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on*

*such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset;*

- *the potential to mitigate landscape and visual impacts through, for example, screening with native hedges;*
- *the energy generating potential, which can vary for a number of reasons including, latitude and aspect.*

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

### **National Policy Statements**

4.15 Paragraph 5 of NPPF confirms that the national policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications. These include:

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

### **East Cambridgeshire District Council Renewable Energy Development (Commercial Scale) SPD (October 2014)**

4.16 The SPD sets out East Cambridgeshire District Council's approach to renewable energy proposals. It is aimed at developers, local communities, Parish Councils and landowners and

seeks to provide people with a better understanding of how planning applications for renewable energy proposals may be assessed by the Council.

4.17 Paragraph 2.4.5 confirms that,

*“In summary proposals for renewable energy generation will be considered on their merits, on a case by case basis. The Council will take account of any environmental, economic or social benefits (as outlined on page 3), and will consider whether there are any adverse impacts, for example on landscape character, the natural and historic environment, public rights of way and highway network, residential amenity and the operation of aviation sites. The Council will refuse planning permission for commercial scale renewable energy schemes where it is considered that there are significant adverse impacts which outweigh the wider benefits of renewable energy development identified above”.*

## 5. Planning Assessment

5.1 Having regard to the local planning policy context and the requirements of the National Planning Policy Framework (NPPF), the key planning considerations are:

- Principle of Development
- Are the proposals Sustainable Development as envisaged in the NPPF?

5.2 This section assesses the proposals against the relevant policies (having regard to the context of the site in respect of constraints) in the NPPF. It also considers the development proposals against relevant up to date development plan policies.

### Principle of Development

5.3 The policy support at a national level to increase the use and supply of renewable and low carbon energy is clear through the government's policies set out in NPPF. Paragraph 158 of NPPF sets out the main planning policy test in relation to renewable and low carbon developments and confirms local planning authorities should:

- *“not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and*
- *approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale*

*projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas”.*

- 5.4 Whilst there is no requirement to demonstrate the overall need for renewable or low carbon energy, the accompanying Environmental Statement prepared by Engena sets out the position in relation to global climate change and associated policies, climate change in the UK, as well as energy security which has come to the fore in recent months following the Russian invasion of Ukraine. The impacts of the proposed development are also considered further in this Statement, the Environmental Statement as well as the accompanying supporting reports.
- 5.5 As outlined above, the application site is located within the Green Belt and notwithstanding the clear broader planning policy support for the development of renewable energy schemes, the principle of development on the site turns on demonstrating compliance with the relevant Green Belt policies.
- 5.6 Policy ENV10 (Green Belt) of the East Cambridgeshire Local Plan outlines the Council's policy on the Green Belt. It states:

*“Development in the Green Belt will be strictly controlled, and limited to certain exceptions as prescribed in the NPPF. Development proposals for exceptions will also need to accord with other policies in the Local Plan.*

*Where development is permitted within the Green Belt it must be:*

- *Located and designed so that it does not have an adverse effect on the rural character and openness of the Green Belt; and*

- *Subject to landscaping conditions, together with a requirement that any planting is adequately maintained to ensure that any impact on the Green Belt is mitigated"*

5.7 Paragraph 147 of NPPF confirms:

*"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances"*

5.8 Paragraph 148 follows:

*"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".*

5.9 In terms of whether development is inappropriate in the Green Belt, the NPPF advises that new buildings are inappropriate subject to a number of exceptions (Para. 149). Paragraph 150 advises that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, however none of these exceptions are considered relevant to the development proposals.

5.10 Paragraph 151 relates specifically to renewable energy projects and states:

*"When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to*

*demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources”.*

- 5.11 The proposed development is by definition inappropriate development in the Green Belt. The acceptability of the proposals in planning terms therefore turns on whether the harm to the Green Belt as a result of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.12 The Planning Statement now considers the development proposals against the Green Belt purposes before outlining the case for very special circumstances.

#### **Green Belt Purposes**

- 5.13 Paragraph 137 of NPPF advises that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 5.14 Paragraph 138 of NPPF outlines the five purposes of the Green Belt as:
- a) to check the unrestricted sprawl of large built-up areas;
  - b) to prevent neighbouring towns merging into one another;
  - c) to assist in safeguarding the countryside from encroachment;
  - d) to preserve the setting and special character of historic towns; and
  - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

5.15 PPG provides guidance on what factors can be taken into account when considering the potential impact of development on the openness of the Green Belt (Paragraph: 001 Reference ID: 64-001-20190722) and advises:

*“Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:*

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation”.*

5.16 The proposed development will consist of solar panels that are ground mounted in rows facing south, and ancillary infrastructure including inverters, transformers, grid connection cabling, CCTV, storage containers, a substation cabinet and a temporary construction compound. In addition, a Battery Energy Storage System (BESS) will be located near to the substation.

5.17 The solar panels will be mounted at a fixed angle of approximately 25 degrees and will have maximum height of 3m, with a minimum clearance from the ground of 0.9m. The other elements of the proposals including the transformer, storage container, battery storage, and security fence range from 2 metres to 3.5 metres in height. The tallest elements of the



substation compound are the DNO Control Room and Solar PV and BESS Substation building at 6 metres to the roof apex. As such, the overall scale of the development proposals from a height perspective is limited.

5.18 As outlined at paragraph 137 of NPPF, the essential characteristics of the Green Belt are their openness and their permanence. The proposals also only have a lifespan of 40 years after which they will be decommissioned unless a further permission is sought, so any harm arising will be temporary and reversable and will not result in the permanent loss of Green Belt.

5.19 The development proposals have been assessed against the 5 purposes of the Green Belt below.

*a) to check the unrestricted sprawl of large built-up areas*

5.20 The development proposals would not result in unrestricted sprawl of large built up areas as shown on Figure 1. Solar farms are not development which would result in the type of sprawl which purpose a) is trying to prevent. Moreover, it is only often possible to locate solar farms of the scale proposed (and needed to increase the amount of green energy generated in this way) on greenfield land in the countryside. As such, large scale solar farms are no longer an unusual feature in the countryside as opportunities to place them anywhere else are limited.

*b) to prevent neighbouring towns merging into one another*

5.21 The application site lies within the very eastern extent of the Cambridge Green Belt and is located a significant distance from any settlement including Cambridge itself as shown on Figure 4 overleaf.

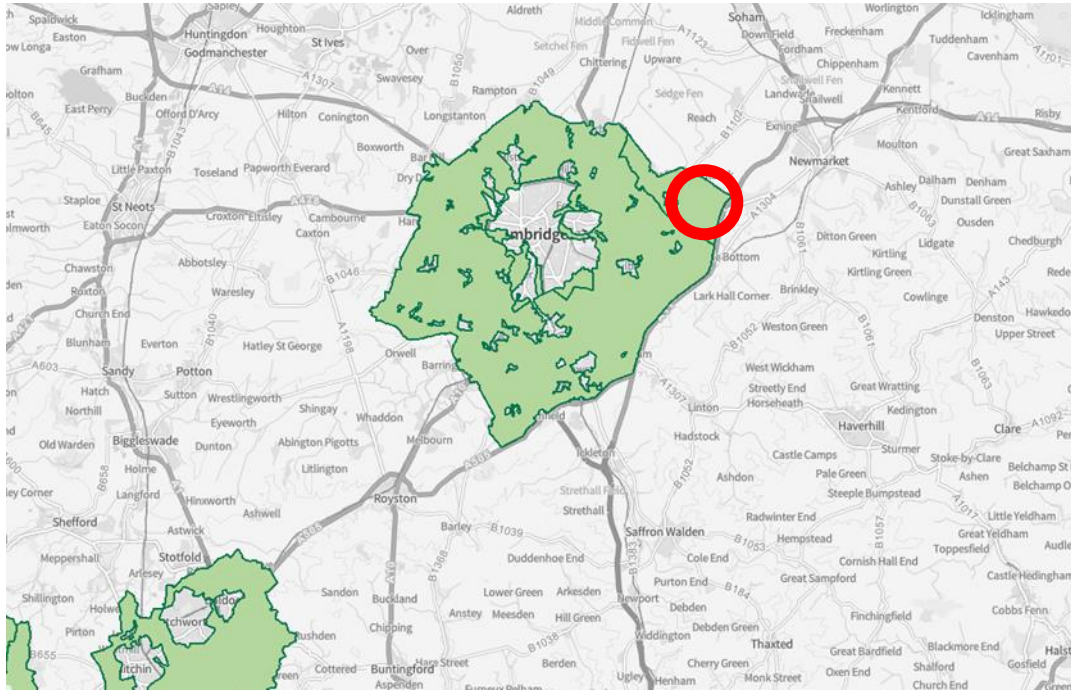


Figure 4: Cambridge Green Belt

- 5.22 It is therefore not considered that the development proposals would lead to towns merging into one another.
- 5.23 Moreover, the nature of the development itself, with the majority of the elements proposed being less than 3 metres in height, alongside the majority of the proposed solar farm will be well screened by existing and proposed hedgerow planting ensuring that there will be no perception of merging.

*c) to assist in safeguarding the countryside from encroachment*

- 5.24 It is acknowledged that the introduction of man-made structures into what is currently open agricultural fields would change the character of the land and would represent an encroachment of 'development' into the countryside. However, the proposed development has a lifespan of 40 years and will be decommissioned unless a further permission is

sought, so any harm arising will be temporary and reversible. The application site is also bound on three sides by major road of electrical infrastructure which contain the site.

5.25 In addition, the degree of activity generated by the development proposals when operational will be limited. During normal operations, personnel will visit the site approximately once a month, in a light van or four-wheel drive vehicle and the panels will be cleaned once or twice a year.

5.26 In terms of the landscape and visual effects of the proposals, the LVA concludes:

*“Overall, the assessment has concluded that there would be no significant changes in views from within any of the settlements and therefore no significant impacts on these receptor groups.*

*The conclusions are that the development would have a substantial and significant impact on the appreciation of views from a single adjacent byway used as a cycle path, footpath and bridleway that crosses the landscape adjacent to the southern edge of the site and moderate to substantial and significant changes in view from a short section of the A11 road east of the site alongside the site, and a not significant change in view from one short section of local road.*

*Following the establishment of the mitigation and landscape enhancements set out in the Landscape and Ecological Management Plan, the changes to the views of the site in the landscape would become only slightly less noticeable, with arable reversion, hedge creation and letting the hedges grow up over the first four years bringing the greatest visual amenity benefits. The resulting long-term effect on the views of the area is assessed as being moderate and adverse.*

*The addition of the proposed Renewable Energy Park in a few middle-distance publicly afforded linear route views in the landscape would adversely alter the appreciation of the viewer of the view. There would be no significant impacts more broadly on the landscape character or views in the local area.*

*The cumulative assessment identifies no cumulative visual effects and no cumulative landscape that would be sufficiently numerous or large in scale to create a solar-farm landscape or alter the perception of view and the landscape”.*

- 5.27 The key consideration from a Green Belt perspective is that impact on views is relatively limited in the context of the scale of the scheme and there would be no significant impacts more broadly on landscape character or views in the local area. Moreover, the landscape and habitat improvements proposed as part of the development will outlast the proposals.

*d) to preserve the setting and special character of historic towns*

- 5.28 It is not considered that the development proposals impact upon the setting or special character of any historic towns.

*e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land*

- 5.29 Whilst not directly contributing to urban regeneration it is not considered that the proposal would neither hinder nor discourage urban regeneration in the settlements of Cambridgeshire.

- 5.30 In addition, the Cambridge City Local Plan (2018) at table 2.4 outlines the purposes of the Cambridge Green Belt as being:

- to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
- to maintain and enhance the quality of its setting; and
- to prevent communities in the environs of Cambridge from merging into one another and with the city.

5.31 For the reasons outlined above, it is not considered that the development proposal conflicts with any of these local purposes largely given the distance of the application site from Cambridge itself and as a result of the nature of the proposals.

5.32 As such, it is considered that the resultant harm to the openness of the Green Belt has been kept to a minimum and will be reduced further by the landscape enhancements that will be implemented as part of the development proposals. Therefore, in addition to any harm arising from the fact that the development would be inappropriate, there is a degree of harm arising from the loss of openness albeit the proposals are only temporary as set out previously and the site is located between two major roads and is adjacent to 400kV powerline. It is considered for the reasons above that the level of harm to openness, as a result of the nature of the proposals and enhancements proposed, will be relatively low.

#### **Other Harm**

5.33 In addition, to the harm to the Green Belt by virtue of inappropriateness, and landscape harm, the development proposals will impact upon the setting the setting of two scheduled monuments in the study area. As set out at paragraphs 5.78 -5.86, it is concluded that the impact on the setting of these assets amounts to less than substantial harm which would be reduced even further through mitigation planting on study site's northern/north-eastern boundary.

## Site Selection

- 5.34 The critical element for new solar farms in the current climate for energy generation is the grid connection and grid capacity in the area. The availability of a grid connection with available capacity in close proximity to the site of a solar farm is a fundamental element of the technical and cost considerations which drive the search for sites for solar farms in England. Without a readily available grid connection close to the site, most sites for solar farms would not be viable. Indeed, as sites scale up in terms of their capacity, the nature of the power lines and connection points becomes even more critical. In addition, the extent of available capacity in the local grid is of equal relevance, since there is significant variability across a District, County or Region as to the available capacity in the grid network.
- 5.35 In terms of current proposals, the developer went through a detailed site selection process and considered a range of environmental and technical constraints. Within East Cambridgeshire district, the developer secured a grid connection at the Fulbourn substation.
- 5.36 Land within relative proximity of this connection location was screened to identify areas with enough contiguous land to host a solar farm with an associated BESS facility. An arbitrary search radius was not applied, rather, a pragmatic review of proximate farmland was considered in light of environmental constraints. Considerations included:
- proximity to ecological, historic or landscape designations
  - proximity to settlements
  - access
  - agricultural land classification
  - land availability

5.37 Taking these constraints into account, the well enclosed land between the A11 and A14 was identified to the east of Bottisham and the application site was chosen as a suitable option. Where sites are available and come forward that demonstrate they have the essential characteristics necessary for electricity generation with an economically viable scheme such opportunities should be embraced due to the limited site options available and the urgent need for domestic renewable energy , especially in light of the Government's BES strategy of an expected five-fold increase in solar.

#### **Case for Very Special Circumstances (VSC)**

5.38 Lord Justice Sullivan in his judgment in *R. (Chelmsford BC) v First Secretary of State* [2003] EWHC Admin 2978) advises that the decision-maker must first decide whether VSC exists before then determining whether those VSC outweigh the potential harm to the Green Belt. Moreover, other established case law (*Sullivan J. in R (Basildon DC) v FSS* [2004] EWHC 2759 (Admin)) confirms that a number of factors, none of them "*very special*" when considered in isolation, may when combined together amount to very special circumstances. The judgement goes on to say that "*there is no reason why a number or factors ordinary in themselves cannot combine to create something very special*".

5.39 The VSC relevant to this case are considered to be:

- the presumption in favour of the proposed development as a sustainable renewable energy scheme;
- the urgent need for renewable energy projects to contribute towards meeting the legally binding and challenging net zero targets, as recognised at a national and local level; and

- the wider environmental, social and economic benefits associated with the proposed development.

#### Presumption in Favour of Sustainable Development

5.40 Paragraph 11 of the NPPF outlines the presumption in favour of sustainable development. Renewable energy can be recognised inherently as a form of sustainable development and in this case fulfils all three of the limbs of economic, social and environmental elements of sustainable development as set out within the NPPF.

5.41 The proposed development benefits from a presumption in favour of sustainable development at a national and local level and as a clean renewable energy project, it is a form of development which is supported in principle for the reasons set out earlier in this Statement.

#### Urgent Need for Renewable Energy

5.42 The accompanying Environmental Statement provides a detailed summary of the policy and guidance which underpins the urgent need to reduce greenhouse gas emissions and reduce reliance on fossil fuels. This is accepted at international, national and local levels, with the Council having also declared a climate emergency and acknowledged the part it is required to play in contributing towards meeting those targets.

5.43 It is predicted that the renewable energy park at this site would offset the equivalent annual electricity needs of approximately 10,730 Cambridgeshire homes (based on average domestic consumption per household of 4 540kWh p.a., (DBEIS 2022)). This level of renewable energy generation is significant and itself justifies very special circumstances.



- 5.44 Six Oaks Renewable Energy Park will connect directly in to the Fulbourn substation at 33kV. Whilst the site is generating it will supply electricity directly into the local distribution offsetting the import of power from the National Grid. Moreover, Cambridge is a city that is planning for significant growth in the future which will require electricity, therefore, Six Oaks is well situated for this.
- 5.45 From the displacement of electricity generated from fossil fuels, the proposed development would offset the emission of a significant quantity of pollutants, particularly carbon dioxide, into the atmosphere. This reduction in emissions would contribute to the national legislation of achieving zero net carbon emissions by 2050 and international reductions required under the legally binding obligations of the Climate Change Act 2008 and international Paris Agreement 2016. It also contributes to the Council's aims of achieving net zero carbon following the Council's declaration of a Climate Emergency in 2019.
- 5.46 Calculations undertaken by Engena and set out in the accompanying Environmental Statement advise that on a conservative basis, the electricity produced by the solar array will offset approximately 9 430 000kgCO<sub>2</sub> /annum or 9 430 tonnes CO<sub>2</sub> per annum (to 3 S.F.). As such, the development proposals would significantly contribute towards reducing CO<sub>2</sub> emissions and the Government meeting its zero net carbon target by 2050.
- 5.47 In addition to the clear environmental benefits associated with the reduction of CO<sub>2</sub> emissions, the development of such facilities will help ensure energy security which has become a much more pertinent issue since the Russian invasion of Ukraine in February 2022 and the pledges made to reduce reliance on Russian oil and gas. It will also reduce the impact of volatile and high gas prices if we're able to use less gas. In April 2022, the UK Government published the British Energy Security (BES) Strategy in response to the global

energy price rise and conflict between Russia and the Ukraine. The Prime Minister set out that "*we're going to take advantage of Britain's inexhaustible resources of wind and - yes – sunshine*" (DBEIS and Prime Ministers Office, 2022a).

- 5.48 For solar the BES Strategy reported that there is currently 14GW of solar capacity in the UK and the cost has fallen so a five-fold increase in deployment is expected by 2035. It goes on to state, "*we will continue supporting the effective use of land by encouraging large scale projects to locate on previously developed, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites.*"
- 5.49 The development proposals will deliver enough electricity annually to power approximately 10,730 Cambridgeshire homes (based on average domestic consumption per household of 4 540kWh p.a., (DBEIS 2022)). This is a significant amount from one development and will further assist the UK in meeting its energy needs in a clean and sustainable manner.
- 5.50 In Autumn 2019, East Cambridgeshire District Council declared a climate emergency and in doing so, agreed to explore a wide range of actions to improve the local environment and do their bit to help mitigate climate change. An annual Environment Plan has then been prepared by the Council to provide a clear statement of the Council's climate change and environmental objectives and to set out how the Council will continue to address environmental and climate change challenges.
- 5.51 In June 2021, the Council agreed to bring forward to 2040 (from 2050) the date for the Council's operations to become truly net zero, with an effectively net zero level achieved by 2034/35. The Council also agreed a series of interim targets towards net zero. The development proposals will therefore assist the Council deliver on its net zero target by 2040.

Wider environmental, social and economic benefits

5.52 In addition to the clear benefits arising from the proposed development as a renewable energy scheme outlined above, the following site specific benefits will also arise from the proposed development:

- socio-economic benefits to local and national UK based contractors, including the supply of construction materials, accommodation and food for construction workers, and of course on construction, the owners of the land where the panels are located will benefit from rental payments, as well as service personnel for site maintenance, with further local demands for equipment and materials, and the payment of business rates for the completed renewable energy park.
- a range of biodiversity benefits including a significant biodiversity net gains of 101 habitat units (an increase of 66%) and 3 hedgerow units (an increase of 2%) arising from the planting of species rich grassland, native tree planting – a line of rowan trees in the south east of the site and provision of bird and bat boxes around the site.
- economic benefits in the form of job generation over the construction, operational and decommissioning phases. Though not quantified, there will be jobs generated in respect of the construction and decommissioning phases for work including civil engineering design, geotechnical ground investigations, civil works, onsite electrical network design, installation and commissioning, aggregate supply, haulage, plant hire and ancillary and tertiary sectors relating to supplies, accommodation, catering etc.

## Conclusions on Green Belt Policy

- 5.53 The development proposals are by definition inappropriate development in the Green Belt. The acceptability of the proposals in planning terms therefore turns on whether very special circumstances can be demonstrated and the harm to the Green Belt by virtue of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.54 It is considered that the harm to the openness Green Belt has been kept to a minimum given the nature of the proposals, position of the site and the landscape and habitat mitigation proposed. The resultant harm is therefore considered to be limited. Some limited harm to the setting of two designated heritage assets has also been identified.
- 5.55 Paragraph 151 of NPPF advises in relation to renewable energy development that, "*very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources*".
- 5.56 For the reasons outlined below, it is considered that very special circumstances exist for the development of the proposed solar farm and battery storage facility in the Green Belt to the east of Cambridge on the basis that the identified harm is clearly outweighed by the following benefits of the scheme:
- The presumption in favour of the proposed development as a sustainable renewable energy scheme.
  - The application site is technically suitable for a solar farm with an appropriate grid connection and the site design software PV Syst confirms a good energy generating potential.

- The majority of the application is lower grade agricultural land (85% - Grade 3b) where planning policy seeks to direct such uses after previously developed land.
- The proposed energy park at this site would offset the equivalent annual electricity needs of approximately 10,730 Cambridgeshire homes (based on average domestic consumption per household of 4 540kWh p.a., (DBEIS 2022)).
- Calculations undertaken by Engena and set out in the accompanying Environmental statement advise that on a conservative basis, the electricity produced by the solar array will offset approximately 9,430 tonnes CO<sub>2</sub> per annum.
- The development proposals would significantly contribute towards reducing CO<sub>2</sub> emissions and the Government meeting its zero net carbon target by 2050. The development proposals will also assist the Council deliver on its zero net carbon target following its declaration of a Climate Emergency in 2019.
- The development of such facilities will help ensure energy security which has become a much more pertinent issue since the Russian invasion of Ukraine in February 2022.
- The proposals have a lifespan of 40 years after which it will be decommissioned unless a further permission is sought, so any harm arising will be temporary and reversible.
- A range of biodiversity benefits including a significant biodiversity net gains of 101 habitat units (an increase of 66%) and 3 hedgerow units (an increase of 2%)
- The scheme will deliver wider social and economic benefits as outlined in paragraph 5.52.

5.57 It is therefore considered that harm to the Green Belt by virtue of inappropriateness, and other limited identified harms, are clearly outweighed by the substantial environmental benefits from the generation of renewable energy that will flow from the granting of

planning permission for the development proposals along with the other identified social and economic benefits. For the reasons outlined above, these significant environmental, social and economic benefits amount to very special circumstances. The proposals therefore accord with the requirements of section 13 of NPPF and Policy ENV10 of the East Cambridgeshire Local Plan.

### **Are the development proposals sustainable development as envisaged by NPPF?**

- 5.58 This section assesses the proposals against the relevant policies in the NPPF. It also considers the development proposals against relevant up to date development plan policies.

#### **Will the scheme meet the challenge of climate change, flooding and coastal change?**

- 5.59 Paragraph 152 of the NPPF advises that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to:
- Shape places in ways that contribute to radical reductions in greenhouse gas emissions
  - Minimise vulnerability and improve resilience
  - Encourage the re-use of existing resources
  - Support renewable and low carbon energy, and associated infrastructure

## Planning for Climate Change

5.60 As set out throughout this Statement, the development proposals will support the transition to a low carbon future by providing a solar farm and battery storage facility with sufficient capacity to power approximately 10,730 Cambridgeshire homes (based on average domestic consumption per household of 4 540kWh p.a., (DBEIS 2022)).

5.61 At a local level the East Cambridgeshire Local Plan (2015) at paragraph 6.7.3 states, *"proposals for renewable energy schemes will be supported wherever possible. The wider environmental, social and economic benefits will be **given significant weight** in planning decisions (Our emphasis)".* Policy ENV 6 (Renewable energy development) of the East Cambridgeshire Local Plan is of most relevance to the assessment of the proposals and confirms;

*"Proposals for renewable energy and associated infrastructure will be supported, unless their wider environmental, social and economic benefits would be outweighed by significant adverse effects that cannot be remediated and made acceptable in relation to:*

- *The local environment and visual landscape impact.*
- *Impact on the character and appearance of the streetscape/buildings.*
- *Key views, in particular those of Ely Cathedral.*
- *Protected species.*
- *Residential amenity*
- *Safeguarding areas for nearby airfields*
- *Heritage assets*

*Renewable energy proposals which affect sites of international, national and local nature importance or other irreplaceable habitats will be determined against the relevant sections of Policy ENV 7.*

*The visual and amenity impacts of proposed structures will be assessed on their merits, both individually and cumulatively.*

*Provision should be made for the removal of facilities and reinstatement of the site, should they cease to operate'.*

- 5.62 The development proposals have been assessed against the criteria in Policy ENV6 in the East Cambridgeshire Local Plan in Table 1 below.

Policy ENV 6 (Renewable energy development)	
Policy Criteria	Response
1 - <i>The local environment and visual landscape impact.</i>	<p>The conclusions of the LVA are outlined at paragraph 5.26 of this Statement so are not re-iterated here.</p> <p>In addition, the cumulative assessment within the LVA identifies no cumulative visual effects and no cumulative landscape that would be sufficiently numerous or large in scale to create a solar-farm landscape or alter the perception of view and the landscape.</p>



<p>2 - <i>Impact on the character and appearance of the streetscape/buildings.</i></p>	<p>The development proposals are not considered to have any impact of the character and appearance of any streetscapes/buildings.</p>
<p>3 - <i>Key views, in particular those of Ely Cathedral.</i></p>	<p>The development proposals would not impact upon any key views.</p>
<p>4 - <i>Protected species</i></p>	<p>The application is supported by an Ecological Impact Assessment which considers the potential impact of the development proposals on protected species. It concludes that other than potential impacts on breeding birds, no other protected species are likely to be affected by the development given the results from the ecological surveys.</p>
<p>5 - <i>Safeguarding areas for nearby airfields</i></p>	<p>A detailed assessment of glint and glare has been undertaken by Neo Environmental. No unacceptable impacts are anticipated.</p>
<p>6 - <i>Heritage assets</i></p>	<p>The planning application is supported by a Heritage and Archaeology Assessment prepared by Orion Heritage. There are no Scheduled Monuments, World Heritage Sites, Registered Battlefields or Registered Parks and Gardens within the site. In addition, there are no listed buildings within the site area. In the wider 2km study area, listed buildings are located within the settlements of Bottisham and Great Wilbraham, with the closest being across the A14 to the north of the site. As such, any potential views will be screened by built form and intervening landscape.</p>

The assessment has considered the following designated archaeological assets: Wilbraham Temple (NHLE1000397), Three bowl barrows 640m north west of Hare Park Stud (NHLE1016819), Five bowl barrows 270m north of Hare Park Stud (NHLE1016818), Four bowl barrows at Allington Hill 420m south west of Allington Hill Farm (NHLE1016820) and Romano-British settlement 200m west of Allington Hill (NHLE1006901).

In the case of Wilbraham Temple there is no intervisibility with the study site, due to intervening topography. For this reason, it is clear that no harm to the significance of the asset would result from the proposed development.

In the case of the Romano-British settlement 200m west of Allington Hill there is no intervisibility with the study site, due to intervening planting and topography. For this reason, it is clear that no harm to the significance of the asset would result from the proposed development.

In the case of the Four bowl barrows at Allington Hill 420m south west of Allington Hill Farm intervisibility is almost completely severed, with only the trees of Allington Hill visible from the study site and the study

	<p>site not visible from the monument. For this reason, it is considered that no harm to the significance of the asset would result from the proposed development.</p> <p>In the case of Three bowl barrows 640m north west of Hare Park Stud and Five bowl barrows 270m north of Hare Park Stud there is intervisibility with the study site and the study site forms part of the setting of the monuments, which contributes to their significance. As such, the monuments have the potential to be indirectly affected by the proposed development and it is considered that less than substantial harm to the significance of the assets would result from the proposed development. Mitigation measures such as additional planting to the study site's northern/north-eastern boundary will aid in reducing the less than substantial level of harm to the assets' significance.</p>
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5.63 It has been demonstrated in this Statement and the accompanying Environmental Statement, that there are no significant adverse effects that cannot be remediated and made acceptable. In addition, the development proposals will not affect any sites of international, national and local nature importance (other than crossing of Heath Road County Wildlife site) or other irreplaceable habitats. The visual and amenity impacts of the proposed structures has been assessed in the LVA both individually and cumulatively. The proposed development has a lifespan of 40 years and will be decommissioned unless a further permission is sought, so any harm arising will only be temporary and reversible.

5.64 The assessment in Table 1 demonstrates that the proposals positively address the requirements of Policy EN6 of the East Cambridgeshire Local Plan and can therefore be considered to fully accord with the policy.

#### Planning & Flood risk

5.65 The application is supported by a Flood Risk Assessment and Surface Water Drainage Assessment prepared by RAB Consultants. The application site is located within Flood Zone 1 and is therefore at the lowest risk of flooding.

5.66 The development proposals will positively address the requirements of section 14 of NPPF by delivering a renewable energy scheme which will support the transition into a low carbon economy by reducing greenhouse gas emissions. In addition, the proposals accord with Policy 8 (Flood Risk) of the East Cambridgeshire Local Plan.

#### **Conserving and enhancing the natural environment**

5.67 Paragraph 174 of NPPF confirms that the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)
- by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland

- maintaining the character of the undeveloped coast, while improving public access to it where appropriate
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate

### Landscape

- 5.68 The conclusions of the LVA submitted with the planning application has been summarised at paragraph 5.26 of this Statement.
- 5.69 The development proposals incorporate a significant amount of landscape planting by way of enhancement including species rich grassland, hedgerow and tree planting,
- 5.70 The objectives of Policy ENV1 of the East Cambridgeshire District Council Local Plan have been fully considered in the LVA and are met by the addition of the long-term reversion of the arable to grassland, reduced intensity of the use of the land, the addition of the new hedges, rowan tree line and the letting up of existing hedges. These landscape maintenance and enhancement details are set out within the Landscape and Ecological Management Plan.

### Agricultural Land

- 5.71 The Environmental Statement prepared by Engena includes a detailed section on agricultural land classification. It confirms that the proposed development will be located on grade 3 land, 15% Grade 3a and 85% Grade 3b. The development proposals therefore only affect predominately Grade 3b agricultural land and which is not best and most versatile in line with the NPPF definition.
- 5.72 Through the development of the proposals, the applicant altered the site design so no Agricultural Land Classification (ALC) Grade 2 land would be developed on, also ensuring that the grade 2 land is still accessible and sizeable enough to be farmed.
- 5.73 Moreover, it is only intended that the proposed solar farm will operate for 40 years after which the land will be restored and, as such, the proposed use does not result in any loss of agricultural land. This is acknowledged in the PPG which states at Paragraph 13 (Reference ID: 5-013- 20150327) 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.'*
- 5.74 The development proposals are predominately using an area of lower grade land in line with the national planning policy requirements. Further detailed analysis is provided in the accompanying Environmental Statement.

## Biodiversity

- 5.75 The planning application is supported by an Ecological Impact Assessment. This summarises the avoidance, mitigation measures and residual impacts on protected and other species and concludes:

*“The proposed development is located on arable farmland, and this is the only habitat that would be lost to the development (other than a small loss of native species-poor hedgerow).*

*There will be no need for any tree felling, and no watercourse crossings are required. The site design has ensured that only lower quality habitats would be affected, with buffers applied from all hedgerows (minimum 5m). These buffers will also ensure that any adverse effects on bats are avoided*

*Mitigation measures will be required during construction to avoid any significant impacts on breeding birds, through the implementation of a Breeding Bird Protection Plan. Pre-construction survey checks will also be required for badgers, to inform any additional mitigation for this species (in case they have moved into the site prior to construction).”*

- 5.76 The biodiversity enhancements will be incorporated with the development of the renewable energy park and managed over the project life in accordance with an outline Landscape and Biodiversity Mitigation and Enhancement Plan. The measures include:
- *Restoration of lowland species-rich grassland* – most of the site is currently arable farmland of low diversity and low ecological value. This will be restored

to grassland habitat, will be managed after construction of the renewable energy park by sustainable grazing (or cutting) and to promote the re-establishment of a diverse meadow community, with abundant wildflowers to provide food for pollinators. An area of 76ha. of arable farmland will be enhanced to deliver a more biodiverse neutral grassland wildflower meadow. This will be located under and around the proposed solar panel land within the site.

- *Native hedgerow planting* – 1.1km of new native hedgerow will be planted and a further 2.5km of existing hedgerow restored to native species-rich hedgerow.
- *Native tree planting* – a line of Rowan *Sorbus aucuparia* will be planted in the south-east corner of the site.
- *Other measures* - A range of bird and bat boxes will be installed to improve the availability of nesting and roosting resources, all to be manufactured from high quality long-lasting material such as 'Woodcrete'. This will include:
  - Barn owl box – one to be erected at a secure location within the site (specific location confidential to avoid disturbance to this species which is specially protected from disturbance under Schedule 1 of the 1981 Wildlife and Countryside Act).
  - Songbird nest boxes – 20 boxes of mixed type (5 x small hole for tits, 5 x larger hole for sparrows, 5 x larger boxes for starlings and 5 x open-fronted boxes for flycatchers/robins/thrushes). These will be erected within existing woodland patches and on trees within existing hedgerows/field boundaries.
  - Bat boxes – 10 boxes – the same locations as songbird nest boxes.

5.77 The creation of new habitat areas will deliver significant biodiversity net gains of 101 habitat units (an increase of 66%) and 3 hedgerow units (an increase of 2%) in line with the requirements of NPPF.



- 5.78 For the reasons outlined above, the development proposals positively address the requirements of section 15 of NPPF and Policy ENV7 (Biodiversity and Geology) of the East Cambridgeshire Local Plan.

### **Conserving and Enhancing the Historic Environment**

- 5.79 Paragraph 195 of NPPF states that LPAs should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).
- 5.80 The planning application is supported by a Heritage and Archaeology Assessment prepared by Orion Heritage. There are no Scheduled Monuments, World Heritage Sites, Registered Battlefields or Registered Parks and Gardens within the site. In addition, there are no listed buildings within the site area. In the wider 2km study area, listed buildings are located within the settlements of Bottisham and Great Wilbraham, with the closest being across the A14 to the north of the site. As such, any potential views will be screened by built form and intervening landscape.
- 5.81 The assessment has considered the following designated archaeological assets: Wilbraham Temple (NHLE1000397), Three bowl barrows 640m north west of Hare Park Stud (NHLE1016819), Five bowl barrows 270m north of Hare Park Stud (NHLE1016818), Four bowl barrows at Allington Hill 420m south west of Allington Hill Farm (NHLE1016820) and Romano-British settlement 200m west of Allington Hill (NHLE1006901).
- 5.82 In the case of Wilbraham Temple there is no intervisibility with the study site, due to intervening topography. For this reason, it is clear that no harm to the significance of the asset would result from the proposed development.

- 5.83 In the case of the Romano-British settlement 200m west of Allington Hill there is no intervisibility with the study site, due to intervening planting and topography. For this reason, it is clear that no harm to the significance of the asset would result from the proposed development.
- 5.84 In the case of the Four bowl barrows at Allington Hill 420m south west of Allington Hill Farm intervisibility is almost completely severed, with only the trees of Allington Hill visible from the study site and the study site not visible from the monument. For this reason, it is considered that no harm to the significance of the asset would result from the proposed development.
- 5.85 In the case of Three bowl barrows 640m north west of Hare Park Stud and Five bowl barrows 270m north of Hare Park Stud there is intervisibility with the study site and the study site forms part of the setting of the monuments, which contributes to their significance. As such, the monuments have the potential to be indirectly affected by the proposed development and it is considered that less than substantial harm to the significance of the assets would result from the proposed development. Mitigation measures such as additional planting to the study site's northern/north-eastern boundary will aid in reducing the less than substantial level of harm to the assets' significance.
- 5.86 In terms of the test at paragraph 202 of NPPF, the public benefits associated with the development proposals are clearly set out at paragraph 5.58 of this Statement.
- 5.87 For the reasons outlined above and within the accompanying report, the development proposals meet the requirements of section 16 of the NPPF and Policy ENV12 of the East Cambridgeshire Local Plan.

## 6. Conclusions

6.1 This Planning Statement (inc. Green Belt Assessment) has been prepared to support a full planning application for a solar array and Battery Energy Storage System (BESS) on land between the A14 and A11 trunk roads in East Cambridgeshire.

6.2 As the application site is located within the Green Belt an assessment of the relevant policies within NPPF has been undertaken. It has demonstrated that any harm to the Green Belt by virtue of inappropriateness and other limited landscape and heritage harm, are clearly outweighed by the substantial environmental benefits from the generation of renewable energy that will flow from the granting of planning permission for the development proposals along with the other identified social and economic benefits as outlined below:

- The presumption in favour of the proposed development as a sustainable renewable energy scheme
- The application site is technically suitable for a solar farm with an appropriate grid connection and the site design software PV Syst confirms a good energy generating potential.
- The majority of the application is lower grade agricultural land (85% - Grade 3b) where planning policy seeks to direct such uses after previously developed land.
- The proposed energy park at this site would offset the equivalent annual electricity needs of approximately 10,730 Cambridgeshire homes (based on average domestic consumption per household of 4 540kWh p.a., (DBEIS 2022)).
- Calculations undertaken by Engena and set out in the accompanying Environmental Statement advise that on a conservative basis, the electricity produced by the solar

array will offset approximately 9 430 000kgCO<sub>2</sub> /annum or 9 430 tonnes CO<sub>2</sub> per annum.

- The development proposals would significantly contribute towards reducing CO<sub>2</sub> emissions and the Government meeting its zero net carbon target by 2050. The development proposals will also assist the Council deliver on its zero net carbon target following its declaration of a Climate Emergency in 2019.
- The development of such facilities will help ensure energy security which has become a much more pertinent issue since the Russian invasion of Ukraine in February 2022.
- The proposals have a lifespan of 40 years after which it will be decommissioned unless a further permission is sought, so any harm arising will only be temporary and reversible.
- The scheme will deliver wider social and economic benefits as outlined in paragraph 5.50

6.3 The proposals are therefore deemed to accord with the requirements of section 13 of NPPF and Policy ENV10 of the East Cambridgeshire Local Plan.

6.4 It has also been demonstrated that the development proposals positively address the requirements of Policy ENV6 in the East Cambridgeshire Local Plan and are therefore deemed to be acceptable in principle. The development proposals will make a valuable contribution towards cutting greenhouse gas emissions.

6.5 The application is supported by a suite of technical documents and an Environmental Statement. These demonstrate that the development proposals will not give rise to any issues which cannot be adequately mitigated. It has been demonstrated, through the planning application, the development proposals would deliver a scheme which complies

with the requirements of the East Cambridge Local Plan and also fully addresses policies and guidance in the NPPF and PPG.

- 6.6 For the reasons outlined in this statement and in line with paragraph 11 of NPPF planning permission should be granted without delay.