

# Planning Application for Solar Development and Associated Works.

Land at Varley Farm.

On behalf of RES Ltd.

Date: December 2022 | Pegasus Ref: P22-0915: R001v3\_PL

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## Document Management.

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# 1. INTRODUCTION

- 1.1. This statement has been prepared by Pegasus Group on behalf of the applicant, RES Ltd, in support of the planning application for a solar farm at Varley Farm, South of Cromhall.
- 1.2. Following a description of the site, consideration is given to the proposed development. The report assesses the proposal in relation to relevant planning policy and shall demonstrate that the application is in accordance with the Development Plan. This statement draws conclusions as to the suitability of the proposal for the granting of planning permission in the context of the Development Plan and taking into account any material considerations.

## Who are RES Ltd?

- 1.3. RES Ltd is the world's largest independent renewable energy company with 40 years' experience developing, constructing and operating renewable assets. RES has delivered more than 21GW of renewable energy projects across the globe and support an operational asset portfolio of over 7.5GW worldwide.
- 1.4. The Group's head office in Kings Langley, near London, is complemented by other offices across the UK including Glasgow, Cardiff, Gateshead, Exeter, Truro, Guildford, Rugby and Larne in Northern Ireland, with engineers working across the UK. Internationally, RES has overseas subsidiary offices in France, Scandinavia, Australia, New Zealand, Canada, Turkey, Germany, and across the USA. The RES Group employs 3,000 staff.
- 1.5. RES has the expertise to develop, construct and operate solar farms of outstanding quality. RES track record has given them a reputation for excellence that is second to none and have achieved significant success in the solar energy market.
- 1.6. Within the UK&I, RES has a team dedicated to solar development and have an exceptional track record. Examples of our recent planning consents are Ballymoneen (105MW), Manusmore (76MW), Cuilmore (40MW), Ballyteige (37MW), and Derril Water (42MW), and of our recent planning submissions are Rathduff (25MW), Longhedge (50MW) and Kingston (50MW).

## Pre-Application Discussions

- 1.7. A request for pre-application advice was submitted to South Gloucestershire Council in May 2022 (Reference PRE22/O331). A meeting was held on 6th July 2022 with Rae Mephram (Case Officer) and subsequent written advice issued on 26th July 2022.
- 1.8. When considering the principle of development, it was acknowledged that renewable energy generation and moving to a low carbon economy would fall under the 'environmental' sustainability principles established within the National Planning Policy Framework as well as contributing to national and local climate change policies. Furthermore, it was advised that the proposed development would make a positive contribution to the South Gloucestershire Climate Change Strategy and would bring positive wider environmental benefits, and this would be given weight in determining a formal planning application.

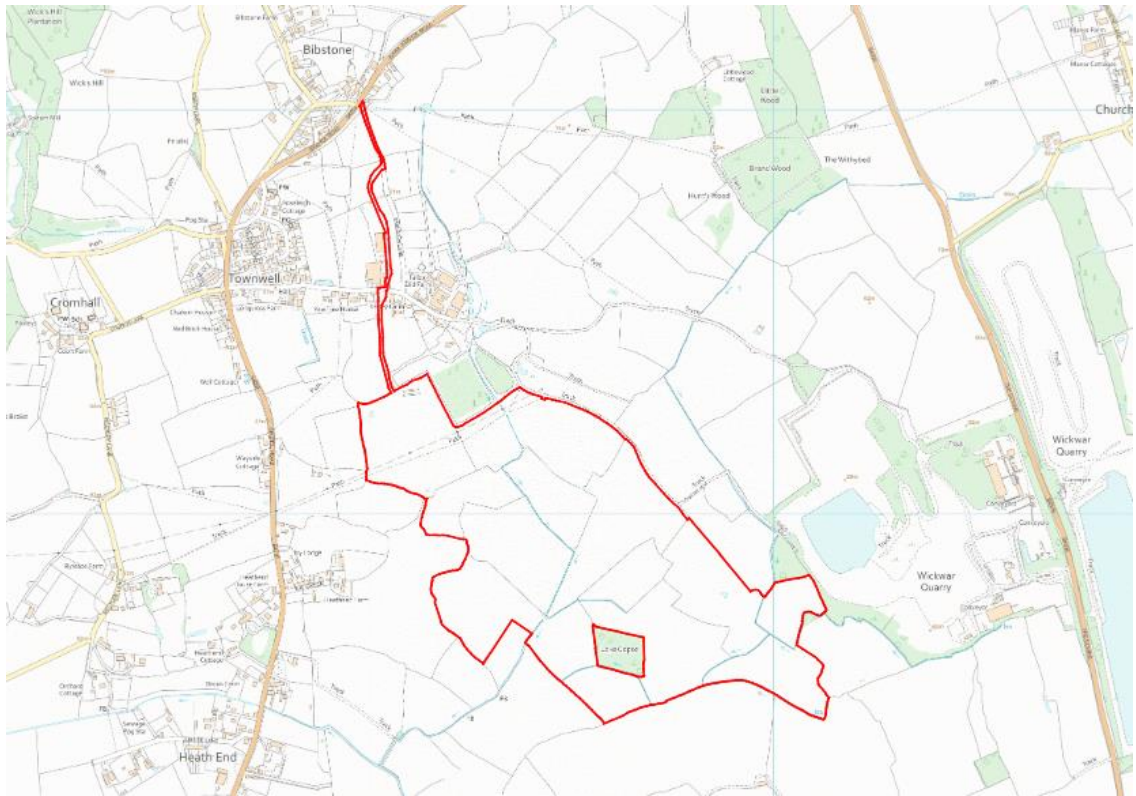


### EIA Screening

- 1.9. An EIA Screening Request was made under Regulation 6 of the Town and Country Planning (Environment Impact Assessment) Regulations 2017, to determine whether the proposals comprised EIA development and the requirement of an Environmental Statement. This submission was made in June 2022 (Reference P22/O18/SCR). The Screening Decision from South Gloucestershire Council outlined that it is the authority's opinion an EIA submission is not required (dated 1st July 2022).

## 2. SITE DESCRIPTION AND CONTEXT

- 2.1. The site is located less than 1km from the villages of Cromhall, Heath End and Cromhall Common and 2km to the northwest of Wickwar (refer to Figure 1 – Site Location Plan and Context Plan below). The proposed solar farm comprises approximately 53.4 hectares of agricultural land.



**Figure 1 – Site Location**

- 2.2. The site is considered to be suitable for solar development and relevant representations have been made to the emerging Local Plan. The site has been assessed for its suitability and has available grid capacity with a connection proposed to existing overhead lines. This Grid connection proposal from the DNO has been accepted in early 2022. Furthermore, it is considered that the site is suitable for renewable development following initial feasibility works with an engaged landowner.

### Relevant Planning History

- 2.3. A search of the Council's online planning application search system has identified an application for the existing solar arrays within the site:

**PT12/4262/F** – Installation of 160no. 40kWp ground mounted solar PV system. Approved 13 February 2013.



## Context

- 2.4. There is an explicit need for the deployment of solar farms and other renewable energy generation, which is driven by a plethora of government legislation at both a local and national level in the UK.
- 2.5. South Gloucestershire Council declared a Climate Emergency in July 2019<sup>1</sup> and pledged to provide the leadership to enable South Gloucestershire to become carbon neutral by 2030. Works going forward include the Council signing up to the UK100 Pledge to enable communities to achieve 100% clean energy across all sectors. Furthermore, the South Gloucester Climate Change Strategy will be updated to reflect the increased urgency and ambition outlined in this motion, and, with our partners across the community, to develop and action plan and 'route map' to a sustainable, low carbon future for the community and also to reflect the new proposed national target of net zero by 2050.

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<sup>1</sup> <https://beta.southglos.gov.uk/wp-content/uploads/Climate-Emergency-Declaration.pdf>



### 3. PROPOSED DEVELOPMENT

3.1. The proposal is for a solar development (PV) farm on land at Varley Farm, south of Cromhall. The development would have the capacity of up to 25MW of renewable energy.

3.2. The description of development is as follows:

**“Construction of a solar farm with all associated works, equipment and necessary infrastructure.”**

3.3. The solar farm would consist of solar PV panels on metal arrays arranged in rows, allowing for boundary landscaping, perimeter fencing and access as detailed on the submitted Infrastructure Layout (Figure 4 –Drawing Number O4886-RES-LAY-DR-PT-003 Rev 1). The panels will have a maximum height of less than 3.5m. The arrays are spaced to avoid any shadowing effect from one panel to another with topography dictating exact row spacing that can range between 2 and 10 meters. The development will have an operational life of 40 years, after which time it will be decommissioned, the equipment will be removed and the land restored to its original condition.

3.4. The application comprises a number of agricultural field enclosures of 53.4 hectares. The scheme will produce up to 25MW of renewable energy. A substation is also necessary to house the equipment that connects the solar park to the local energy distribution network. The Grid connection proposal from the DNO has been accepted in early 2022.

3.5. The Proposed Development can be summarised as follows:

- Solar PV Arrays (up to 3.5m in height)
- 10 no. Inverters – 9m x 3m x 3m (L x W x H) including hard standing inverter pad.
- Substation Compound (34m x 27m) including all relevant infrastructure
- Spares Container
- Fencing
- Surface Water Attenuation Pond
- Sheep Handling System
- CCTV columns (3.5m in height)

3.6. The site has been carefully selected and is capable of supporting the development. It has no environmental or historic designations, is relatively secluded from surrounding residential properties and will have limited impact on the visual amenities of the surrounding area. In addition, it is possible to obtain a viable connection to power lines with the capacity to take the power produced.





3.7. Care has been taken to retain existing trees and hedgerows where possible: to retain the character of the local area: to maintain existing visual buffers; and to maintain biodiversity.

3.8. Landscape mitigation proposals, include the following where practicably possible:

- Offsetting from the existing field boundaries and hedgerow to avoid impact on the root protection areas. A generous buffer has been incorporated to allow for maintenance.
- Management and enhancement of all existing field boundary hedgerows to an approximate height of 3.5m to reduce visibility from the north.
- Physical offsets to be provided from the Public Rights of Way (PROW) that cross the site. This will reduce the visibility from all PROWs within the site.
- New hedgerows are to be implemented either side of the retained Public Footpaths within the site.

#### **End of Life Decommissioning**

3.9. Compared to other power generation technologies, solar parks can be easily and economically decommissioned and removed from the site at the end of their life (40 years) with the site returned to its original form, in this instance agricultural land though the proposed landscaping may be retained.

3.10. There are several aspects involved with the decommissioning phase. The main activities comprise:

- Removal of PV panels with them taken away for recycling.
- Removal PV support. With no supporting concrete foundations, these can easily be mechanically abstracted from the ground.
- Removal of inverters with cranes. The prefabricated concrete slab upon which they are supported can be lifted or broken up and removed.
- Removal of cable and ancillary structures.
- Removal of fencing and any ancillary associate equipment.

## 4. PLANNING POLICY CONTEXT

### Legislative Background

- 4.1. This chapter summarized the planning policies and guidance relevant to the development proposed.
- 4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 required that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) is a key materials consideration in the determination of planning applications and also sets out the framework of policies with which up-to-do development plans must be in accordance.

### Development Plan

- 4.3. The current development plan for South Gloucestershire comprises the Core Strategy (2013) and Policies, Sites and Place Plan (2017). The local policies recognised as relevant to any subsequent application are as follows:

#### Core Strategy 2006–2027 (2013)

- 4.4. The policies relevant to this application are as follows:
- Policy CS1 – High Quality Design
  - Policy CS2 – Green Infrastructure
  - Policy CS3 – Renewable and Low Carbon Energy Generation
  - Policy CS4A – Presumption in Favour of Sustainable Development
  - Policy CS5 – Location of Development
  - Policy CS6 – Infrastructure and Developer Contributions
  - Policy CS9 – Managing the Environment and Heritage
  - Policy CS10 – Minerals
  - Policy CS34 – Rural Areas
  - Policy CS36 – Proposals for Major Infrastructure Projects
- 4.5. Specifically, Policy CS3 states that proposals for the generation of energy from renewable or low carbon sources, provided that the installation would not cause significant demonstrable harm to residential amenity, individually or cumulatively, will be supported where:

*“In assessing proposals significant weight will be given to:*

1. *The wider environmental benefits associated with increased production of energy from renewable sources.*
2. *Proposals that enjoy significant community support and generate an income for community infrastructure purposes by selling heat or electricity to the National Grid.*
3. *The time limited, non-permanent nature of some types of installation; and*
4. *The need for secure and reliable energy generation capacity, job creation opportunities and local economic benefits.*

*Renewable or low carbon energy installation will not be supported in areas covered by national designations and area of local landscape value unless they do not individually or cumulatively compromise the objectives of the designations especially with regard to landscape character visual impact and residential amenity.*

*Developments will also be required to meet objectives of Policy CS1 (High Quality Design), as far as engineering requirements permit.”*

#### Policies, Sites and Places Plan (2017)

4.6. The policies relevant to this application are as follows:

- Policy PSP1 – Local Distinctiveness
- Policy PSP2 – Landscape
- Policy PSP3 – Trees and Woodland
- Policy PSP6 – Onsite Renewable and Low Carbon energy
- Policy PSP8 – Residential Amenity
- Policy PSP11 – Transport Impact Assessment
- Policy PSP17 – Heritage Assets and the Historic Environment
- Policy PSP18 – Statutory Wildlife Sites: European Sites and Sites of Special Scientific Interest (SSSIs)
- Policy PSP19 – Wider Biodiversity
- Policy PSP20 – Flood Risk, Surface Water and Watercourses
- Policy PSP21 – Environmental Pollution and Impacts
- Policy PSP24 – Mineral Safeguarding Areas

### Emerging Planning Policy

- 4.7. South Gloucestershire Council are currently in the process of developing their new Local Plan with the Phase 2 consultation concluding in April 2022. The emerging Local Plan seeks to support the development of renewable energy generation in South Gloucestershire and achieve 100% renewable energy across all sectors. Furthermore, the emerging Local Plan focuses primarily on wind and solar renewable energy because:
- evidence also shows that standalone wind and solar photovoltaic (ground mounted) technologies are the cornerstone of any renewable energy strategy;
  - these resources provide the most opportunities in South Gloucestershire, compared to other resources such as hydropower;
  - they are a 'mature' technology in that they are technically well developed, widely used globally and cost effective, and can be deployed rapidly;
  - they have the most significant spatial implications of all types of renewable energy generating development;
  - this is consistent with existing national policy and the Government's recently published Net Zero Strategy; and
  - the council, as the local planning authority, can play an important role in their delivery.
- 4.8. The proposed development aligns with the primary focus of the emerging Local Plan and the site at Varley Farm is located within land which the Local Plan Phase 2 has identified as suitable for solar development.

### **Supplementary Planning Documents (SPDs)**

#### South Gloucestershire Council Renewables SPD (November 2014)

- 4.9. This document acknowledges that the South Gloucestershire Climate Strategy document sets local target on carbon reduction and renewable energy. When considering ground mounted solar (Section 8.6) it is identified that medium to large scale solar parks are likely to require buildings for switch gear and inverters etc. Cumulatively it is discussed that this can have a significant impact on the character of the locality and the below ground archaeological resource, therefore sensitive siting and design is required to ensure that the impacts are reduced to an acceptable level. Where located on derelict or previously intensively managed ground, solar parks have the potential to improve biodiversity value. Solar parks however are generally considered to be 'temporary' features in the landscape, generally planning for 25 to 30 years duration.

## National Policy

- 4.10. In June 2019, the UK became the first major economy to implement a legally binding net zero carbon emissions target by 2050.<sup>2</sup> Decarbonising the power sector is integral to achieving this target and requires major investments into renewable technologies, such as solar power, which are supported by planning policy at both local and national levels.
- 4.11. The National Infrastructure Committee (NIC), official advisor to the Government on Infrastructure, has published a report (Net-Zero Opportunities for the Power Sector, March 2020<sup>3</sup>) setting out the key infrastructure requirements needed to meet the UK's 2050 net-zero target, including the amount of renewable energy development that would need to be deployed. The NIC recommends that in meeting these targets, the UK's energy mix needs to be made up of around 90% renewables. The NIC recommends that across all scenarios, significant levels of solar, onshore wind and offshore wind will need to be deployed with between 129–237GW (gigawatts) of renewable energy capacity in operation by 2050. Furthermore, the British Energy Security Strategy<sup>4</sup> published in April 2022 states that solar deployment will increase five-fold by 2035.
- 4.12. Furthermore, the Draft National Policy Statement for Renewable Energy Infrastructure (EN-3)<sup>5</sup> acknowledges that electricity generation from renewable sources of energy is an essential element of the transition to net zero. When specifically considering solar development this document outlines at paragraph 2.47.1 that the government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector.

## National Planning Policy Framework (NPPF)

- 4.13. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development in its three dimensions; economic, social and environmental. Central to the NPPF is presumption in favour of sustainable development. For decision taking this means (paragraph 11):
- *Approving proposals that accord with the development plan without delay; and*
  - *Where the development plan is absent, silent or relevant policies are out of date, granting permission unless;*
    - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF; or*

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<sup>2</sup> <https://www.legislation.gov.uk/ukdsi/2019/978011187654>

<sup>3</sup> <https://nic.org.uk/studies-reports/net-zero-opportunities-for-the-power-sector/>

<sup>4</sup> <https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy#renewables>

<sup>5</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1015236/en-3-draft-for-consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015236/en-3-draft-for-consultation.pdf)



- *Specific policies in the framework indicate development should be restricted."*

4.14. Paragraph 152 of the NPPF states that the planning system should support transition to a low carbon future in a changing climate and should support renewable and low carbon energy and associated infrastructure.

4.15. Paragraph 154 of the NPPF states that new renewables development should be planned for in ways that:

- a) *avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and*
- b) *can help to reduce greenhouse gas emissions, such as through its location, orientation, and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.*

4.16. Paragraph 157 outlines that when determining planning applications, local planning authorities should expect new development to:

- a) *comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*
- b) *take account of landform, layout and building orientation, massing and landscaping to minimise energy consumption.*

4.17. Finally, Paragraph 158 states 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 used in identifying suitable areas.*

4.18. Best and most versatile land is defined within the glossary of the NPPF as "Land in grades 1, 2 and 3a of the Agricultural Land Classification."

National Planning Practice Guidance (NPPG) (first published March 2014)

4.19. The Government's web-based NPPG went live on 6th March 2014 and contains guidance on the planning system and has been updated periodically. The web-based guidance should be read alongside the NPPF and is a material consideration in the consideration of planning applications.

4.20. Renewable and Low Carbon Energy forms one of the chapters in the NPPG. Paragraph O13 (ID: 5-013-20150327) is entitled “What are the particular planning considerations that relate to large scale ground-mounted solar photovoltaic farms?” and sets out the following factors for consideration:

- encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value;
- where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.
- that solar farms are normally temporary structure 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 largescale 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.

## 5. SITE SELECTION ASSESSMENT

- 5.1. This section of the report confirms the requirements and circumstances which need to be in place for solar farm to be provided in order to determine a 'Site Search Area' and the detailed considerations undertaken to find suitable land within these identified areas.

### **Fundamental Requirements**

- 5.2. As discussed within the Planning Statement, there are a number of fundamental considerations for the applicant to understand whether a solar farm can be accommodated on the land.

### **Capacity of Electricity Network and Ability to Connect**

- 5.3. The solar farm needs to be capable of connecting to the Electricity Network at a location where there is existing capacity.
- 5.4. Further, the Applicant is required to have agreement from the District Network Operator (DNO) to export electricity at that location.

### **Viable Connection**

- 5.5. A scheme of this scale is required to connect into a 33kV High Voltage line in order to export electricity. Where a site is not adjacent to a power line, the cost of the grid connection will usually make it uneconomical.
- 5.6. It is not possible for a solar scheme to connect to lines that have voltage or thermal constraints. The further the distance from suitable grid access as site is located, the greater the challenge of transferring any generated electricity to the grid. Increased cabling and labour costs as well as potentially more 3rd party land easements increase costs dramatically and can therefore render a project uneconomical.
- 5.7. The area of search has therefore been narrowed down substantially, to an area adjoining the power lines with capacity.

### **Site Identification Criteria**

- 5.8. In order to identify potential locations for the solar farm within the Site Search Area, the matters outlined below are considered.

### **Environmental and Planning Constraints**

- 5.9. The Applicant considers the presence of designation and constraints which would mean the principle of a solar farm would unlikely be acceptable or be less preferable than in order locations. Such designations include:
- Planning designations, including Green Belt land.
  - Landscape designations, including Areas of Outstanding Natural Beauty.
  - Ecological designations, including SACs, SPAs, SSSIs and Local Nature Reserves.





- Heritage designations, including scheduled monuments, listed buildings, conservation areas and Ancient Woodland.
- Environment Agency defined Flood Zone 2 and 3 land.

#### Achieving a Viable Scale and Land Ownership

- 5.10. The UK Government's Renewables Obligation Certificate scheme to subsidise solar PV development ended in April 2017. In the absence of subsidy, the scale of solar farms is required to be larger in capacity in order to achieve a viable scheme and economies of scale.
- 5.11. The Applicant requires sufficient land to accommodate a solar PV development with a capacity of 25MW in order to achieve viability. The land requirements vary depending on various matters, however a significant area of land is required to maximise efficiency and yield of the solar farm to maximise renewable energy benefits.

#### Availability of Non-Agricultural Land / Previously Developed Land

- 5.12. In recognition of National Planning Practice Guidance relating to large-scale solar PV, land which is not in agricultural use and/or previously developed is prioritised.
- 5.13. The Natural England Provisional Agricultural Land Classification (ALC) Map identified land which is non-agricultural, supported by analysis of aerial photography.
- 5.14. The relevant Brownfield Land Register is consulted for details of potentially available previously developed land within the Site Search Area along with aerial photography analysis.
- 5.15. Note that development on rooftops is not considered feasible or viable at the proposed scale.

#### Agricultural Land Quality

- 5.16. In circumstances where no non-agricultural or previously developed land is identified in the Site Search Area, and use of agricultural land is therefore necessary, consideration is given to the Natural England Provisional ALC Maps to consider the agricultural land quality.
- 5.17. The ALC maps define agricultural land quality as being Grades 1-5 (1 being 'Excellent' and 5 'Very Poor'). Note that the mapping does not distinguish between Grade 3a 'Good' and Grade 3b 'Moderate' land.
- 5.18. Preference is given to the use of poorer quality agricultural land over higher quality land.

#### Site Access

- 5.19. The construction and decommissioning phases of the development require access by Heavy Goods Vehicles (HGVs) to the site to transport solar panels and supporting equipment. It is necessary for any land to be accessible from the highway network from roads capable of accommodating such vehicles. Typically, those roads considered suitable in scale to accommodate construction and decommissioning vehicles are 'A' and 'B' roads.



### **Site Identification – Land at Varley Farm**

- 5.20. The Application Site is considered to be the most preferable having regard to the relevant matters set out above and was therefore progressed to a planning application. In summary, the reasons are:
- The Applicant Site allows for a viable connection to the Electricity Network. This will be achieved by connecting to the existing 33kV overhead line via a substation in the north west corner of the site.
  - The landowner is willing to enter into an agreement to promote the land for a solar farm and the Application Site is therefore available to accommodate this development.
  - The available land and large landholding on which the Application Site is located means that a scheme of a viable scale can be achieved.
  - The Application Site avoids any statutory environmental and planning designations, including Green Belt land. Whilst it is acknowledged that there is an area of flood zone 2 and 3 within the south-western area of the site, the scheme has been appropriately designed to account for this constraint and the development is supported by a Flood Risk Assessment.
  - The Application Site can be accessed using roads of sufficient capacity to accommodate vehicles for construction and decommissioning, with site access connecting to the B4058 (via Farleigh Lane and Talbots End).
  - There is no unconstrained non-agricultural land or any previously developed land on which the scheme could alternatively be provided. It is therefore necessary for this development to be located on agricultural land.
  - The Application Site has been subject to a detailed Agricultural Land Classification study which confirms the site comprises 98.2% Grade 3b 'moderate' quality land' and Grade 4 land, which is not classed as best and most versatile (BMV) land and subject to protection in planning policy. It is acknowledged that there is a small area of Grade 3a land (1.8%) but it is considered that the significant environmental benefits and location to a viable grid connection outweigh the loss of land.
- 5.21. The Landscape and Visual Impact Assessment confirms that there is little or no visibility towards the site from Cromhall or other surrounding settlements with any impacts being revised fully following the decommissioning of the proposed solar farm at the end of its life.
- 5.22. In the context of the other considerations relevant to site selection, the Application Site would allow for a viable scheme on land which is available for a solar farm development which is preferable in planning terms to other land in the Site Search Area to achieve the substantial public benefits of renewable energy generation.
- 5.23. The Application Site is therefore considered to represent an appropriate location of the Proposed Development. Any heritage or landscape and visual effects considered must be judged in this context.



### **Conclusions**

- 5.24. The specific land take and land characteristics guiding a c.25MW ground mounted solar scheme make the application site the best and most viable site within the search area. There are no alternative sites that are more sequentially favourable.
- 5.25. Key to suitability and viability is grid access. Sites must be within 1km of a grid connection to be viable, and for a site such as that being proposed to connection would normally need to be on site.
- 5.26. There are no brownfield sites available that can accommodate the proposal.
- 5.27. Having narrowed the search area, key to the suitability of this particular site was the landowner agreeing to a solar park on the site and other features such as good screening, relatively poor land quality, neighbouring developments, the contained nature of the site.

## 6. ASSESSMENT OF PROPOSED DEVELOPMENT

6.1. The following section of this report assesses the development proposals against the policies of the Development Plan, the NPPF and NPPG. It is considered that the key issues in the determination of the application are the principle of development, the impact upon landscape, amenity and biodiversity, highways and traffic implications and flood risk.

### General Principle of Development

6.2. This application seeks permission for a solar photovoltaic (PV) farm on land at Varley Farm, South of Cromhall.

6.3. Policy CS3 states that proposals for the generation of energy from renewable or low carbon sources, provided that the installation would not cause significant demonstrable harm to residential amenity, individually or cumulatively, will be supported where:

*“In assessing proposals significant weight will be given to:*

1. *The wider environmental benefits associated with increased production of energy from renewable sources.*
2. *Proposals that enjoy significant community support and generate an income for community infrastructure purposes by selling heat or electricity to the National Grid.*
3. *The time limited, non-permanent nature of some types of installation; and*
4. *The need for secure and reliable energy generation capacity, job creation opportunities and local economic benefits.*

*Renewable or low carbon energy installation will not be supported in areas covered by national designations and area of local landscape value unless they do not individually or cumulatively compromise the objectives of the designations especially with regard to landscape character visual impact and residential amenity.*

*Developments will also be required to meet objectives of Policy CS1 (High Quality Design), as far as engineering requirements permit.”*

6.4. The South Gloucestershire Council Renewables SPD (November 2014) outlines a number of design guidelines identified on the key matters of significance when assessing the impact of solar park proposals. These are as follows:

Guidelines of Section 8.6	Requirements Met
Select a site with close proximity to a grid connection, and utilise underground connections where possible, carefully planning to route to avoid damage to heritage, landscape or wildlife features.	The site is located adjacent to existing 33kV overhead powerlines. The substation has been suitably located within the site to allow for the connection to the Grid. Please see Infrastructure Layout (Figure 4 - Drawing Number O4886-RES-LAY-DR-PT-

	003 Rev 1). Site selection is discussed in greater details at Section 5
Seek to utilise previously developed land where available.	As discussed in the Site Selection methodology there were no appropriately located sites available and this site is considered to meet the necessary requirements of grid connection in line with the Draft National Policy Statement for Renewable Energy Infrastructure (EN-3).
Seek sites with less visibility in public views	It is acknowledged that the site is intersected by a number of Public Rights of Way (PROW). However, this scheme has been designed to provide necessary mitigation from local viewpoints as demonstrated within the submitted Landscape and Visual Assessment and discussed in detail at Section 6.25 onwards.
Ensure that proposals do not compromise the objectives and settings of sites and areas that are defined for their natural beauty, heritage value or biodiversity.	The site is not located within and nationally or locally designated area for heritage, landscape or ecology. The local landscape character area is appraisal in the submitted Landscape and Visual Assessment.
Avoid higher grade agricultural land, i.e. that defined as best and most versatile (grades 1, 2 and 3a).	The land is predominantly Grade 3b in classification with a small area of Grade 3a land. As such the land is not considered to comprise Best and Most Versatile (BMV) land.
Avoid sites where levelling works will be required.	No levelling works are required for this site.
Site planning and design should ensure that there is no disturbance to local communities and sensitive receptors.	This has been accounted for within the design and is therefore met.
Retain, protect, actively manage & enhance hedgerow network and tree cover to help absorb solar park and maintain and enhance biodiversity. Laid hedges can be stock proof and improve the security of the site.	The scheme has been designed to retain and enhance existing landscape features included existing hedgerow field boundaries and tree copses. This is discussed further at Section 6.25 onwards.
Seek to manage ground vegetation by sheep grazing, as this allows the panels to be kept relatively low to the ground. Grazing by	The scheme has been designed to allow for the grazing of sheep under the panels. This

larger animals should be avoided as this requires the panels to be raised up, increasing their visibility and disruptiveness in the landscape	will be subject to an appropriately worded management strategy.
Encourage floriferous native ground flora to enhance biodiversity for bees/ insects.	The proposal includes provision for biodiversity net gains and landscape enhancement.
Ensure that the project is constructed to be reversible so that there is no permanent degradation of the landscape. For example, ensure that installations (e.g pile or screw foundations that are capable of easy removal) and access tracks are 'reversible' at the end of their life, so that the land can be returned to its original form and condition	As discussed at Section 3 the development will be decommissioned and removed from the site at the end of its life (40 years) with the site returned to its original form, in this instance agricultural land though the proposed landscaping may be retained.
Locate access tracks connecting to the installation to run alongside linear features such as hedges or stone walls.	This guidance has been implemented within the design of the scheme with access tracks located adjacent to field boundaries where feasible to do so.
Allow for at least 5+m buffers to existing hedgerows to conserve ground flora, allow for the movement of wildlife and to prevent shading.	Appropriate buffers have been accounted for from existing hedgerows and appropriate mitigation and gap filling proposed where necessary. This approach has been supported by the Arboricultural Impact Assessment.
Locate and design any buildings or structures, including transformer boxes to avoid intrusive locations such as open or high ground, take advantage of the screening effect of landscape features such as trees or hedgerows, and to blend with the landscape and to reflect local building form and materials	The substation has been appropriately designed and located within the north-eastern area of the site at an appropriate location away from nearby residential receptors.
Ensure the conservation of top soil, by stripping in advance of construction, handling and storing in accordance with best practice, and reinstating once the scheme is installed. Similar procedures should be followed at decommissioning.	N/A

<p>Where security fencing is necessary utilise a design that is not intrusive (such as weld mesh in a dark colour), that it does not form a barrier to wildlife movement and use existing hedges to screen.</p>	<p>Fencing details are provided on Typical Substation Security Fence Details (Figure 9 –Drawing Number O4886-RES-SEC-DR-PT-001 Rev2) and Perimeter Deer Fence and Typical Detail (Figure 10 – Drawing Number O4886-RES-SEC-DR-PT-002 Rev 1). It is considered that this meets the necessary criteria.</p>
<p>Minimise security lighting and use passive infra-red (PIR) to minimise glare, light pollution and impacts on biodiversity.</p>	<p>The scheme will not be lit following the completion of construction. Sensitive lighting will be implemented as part of the construction phase as agreed in a condition Construction Environmental Management Plan (CEMP).</p>
<p>If CCTV is required this must be carefully located and integrated with the landscape scheme to minimise visual and landscape impact.</p>	<p>CCTV details are provided on the submitted Typical CCTV Details (Figure 13 – Drawing number O4886-RES-SEC-DR-PT-003 Rev 1). It is considered that this meets the necessary criteria.</p>
<p>Ensure that drainage is designed to avoid concentration of run off and the formation of gulleys.</p>	<p>A water supply attenuation pond is proposed to be provided within the site adjacent to the substation. Further details of the drainage strategy are detailed within the Flood Risk Assessment.</p>
<p>Ensure that there is a mechanism for community liaison prior to and during development, operation and decommissioning.</p>	<p>Public Consultation works to date are detailed within the submitted Consultation Statement and a project website available to provide ongoing updates to the local community.</p>
<p>Grid connections should be sensitively designed and planned as an integral part of the scheme design, and undergrounded where necessary to protect the character and visual amenity of the locality</p>	<p>Grid connection will be achieved via the existing 33kV overhead powerline. The substation is therefore located accordingly</p>

6.5. It is considered that these are the main local level policies against which a development of this kind will be assessed.

6.6. Planning permission should therefore be granted unless adverse effects of the development outweigh these beneficial impacts. The individual policy considerations are provided below, in order to make this judgment. As this Planning Statement demonstrates, the scheme is in



accordance with the key policies from within the Development Plan. Notwithstanding this, the benefits outlined below weigh in favour of the proposals and would outweigh any of the very low level harm that has been identified.

#### Benefits of Solar Generation

- 6.7. Producing electricity with photovoltaic (PV) panels, produces no greenhouse gases during operation and uses no finite fossil-fuel resources. Where, as has been generally recognised, the current consumption of and reliance on fossil fuels is unsustainable, there is a very real need to find a viable long term alternative solution. To this end, there is greater emphasis on renewable energy sources for the production of power, with all Local Authority being encouraged to ensure that a greater percentage of the power consumed in their areas is from these sources, thereby reducing their carbon emissions.
- 6.8. In addition, it is now widely accepted that climate change is happening and a key contributing factor are carbon emissions from the use of fossil fuels. The increased production of energy from renewable sources, such as solar PV, has very real benefits in off-set saving in carbon dioxide emissions and reducing the potential impact of greenhouse gases on climate change. It will also ensure a constant and affordable source of energy, contribute to economic stability and provide a further form of diversification to support total economies.
- 6.9. The amount of energy which can be harnessed from the sun's radiation is often underestimated. In the UK, we receive a vast amount of solar energy. In an average year we receive as much as 60% of the solar energy which is received on the equator. There is often the misconception that solar technologies can only be used within the summer months, but the UK has a large number of clear spring, autumn and winter days, where the Sun's radiation can be harnessed, meaning that solar technologies can contribute to energy consumption for the whole year.
- 6.10. The provision of a broad range of energy solutions, including solar, creates a more robust energy network that is less susceptible to fluctuations in global markets for oils and gas, making the UK energy supply less carbon intensive with greater levels of resilience, security and self-sufficiency.

#### Social, Economic and Local Community Benefits

- 6.11. The proposed development would generate social, economic and local community benefits, these include but are not limited to:
- Increased renewable energy generation
  - Reduction in carbon emissions has a consequential positive effect upon public health, via the reduction in greenhouse gases and associated improvements to air quality.
  - Economic benefits associated with investment and support of jobs during the construction phase of development. RES encourage contractors to source construction materials locally (i.e. within the country) and to use local transport and plant hire companies where possible, in addition to local services and amenities.
  - Appropriate biodiversity and landscape enhancements via increased boundary planting and species-rich grassland.



- South Gloucestershire Council retains 100% of all the business rates due from Renewable Energy businesses (Solar and Wind Farms) to fund vital local services for all local residents. If consented, we estimate Varley Solar Farm would deliver around £80,000 in business rates annually.
- As a result of the consultation outlined above, if the Proposed Development is consented, the Applicant has committed to supporting the Cromhall Road Safety Project towards the purchase of a Safe Speed Camera System to be used in combination with/as part of the Cromhall Community Speed Watch team.

6.12. The above outcomes associated with the scheme progressing, and associated Local Plan support for renewable energy generation, are considered to cumulatively represent very substantial benefits and as such are material considerations which weigh greatly in favour of planning permission being granted.

6.13. It is considered that the general principle of the development is acceptable. The proposed development provides a real opportunity to make a meaningful contribution to the UK's renewable energy and climate change target as well as providing opportunities to enhance local economic development. The site is sustainably located as is considered to meet the requirements of national policy.

#### **Agricultural Land Classification**

6.14. The site in its current use comprises agricultural land. The accompanying agricultural land classification document confirms that 66 hectares of land was surveyed. The grading of the land as concluded within the submitted report is as follows:

<b>Table 2. ALC gradings and limitations</b>			
<b>Grade</b>	<b>ha</b>	<b>%</b>	<b>Limitation</b>
<b>1</b>			
<b>2</b>			
<b>3a</b>	10.0	15.2	<b>Droughtiness and wetness</b>
<b>3b</b>	43.0	65.2	<b>Wetness</b>
<b>4</b>	13.0	19.6	<b>Wetness</b>
<b>5</b>			
<b>Non-agricultural land</b>			
<b>Total</b>	<b>66</b>	<b>100%</b>	

6.15. However, following the initial constraints analysis field 1 as detailed on the submitted Figure 3 (O4886-RES-LAY-DR-PT-006 Rev 2) was excluded from the red line development boundary. This reduced the amount of Grade 3a land within the red line boundary by approx. 1.8%, the remaining and within the site is classified is Grade 3b land and therefore does not comprises best and most versatile land.

6.16. It is acknowledged that the development will require agricultural land to be removed from arable production but will not preclude its use for grazing of smaller animal, grass cutting for conservation nor establishment of biodiversity or pollinating area for the duration of the

scheme. As such, this form of development is, with appropriate management, a reversible proposal.

6.17. Policy CS9 of the Core Strategy identified that, *"the natural and historic environment is a finite and irreplaceable resource, In order to protect and manage South Gloucestershire's environment and its resources in a sustainable way, new development will be expected to:*

*9. Maximise opportunities for local food cultivation by (a) avoiding the best and most versatile agricultural land and; (b) safeguarding allotments."*

6.18. Furthermore, Policy CS34 of the Core Strategy identifies the vision for rural areas including, to *"protect the best and most versatile agricultural land and opportunities for local food production and cultivation to provide for nearby urban areas and settlements."*

6.19. The NPPF outlines that planning policies and decisions should contribute to and enhance the natural and local environment by 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.

6.20. It is acknowledged that development is generally supported in areas of outside of best and most versatile (BMV) land. However, as detailed within the Draft National Policy Statement EN-3, developers consider several factors when identifying the location and layout of sites including solar irradiance, proximity to available grid capacity to accommodate the scale of generation, predominance of open land, topography, previous land use and the ability to mitigate environmental impacts and any flood risk. Therefore, it is not considered that the absence of BMV land should be predominant factor in determining the suitability of site selection. This should be considered on balance, with all benefits arising from the scheme.

6.21. The proposed development will result in a loss of an area of best and most versatile land (but not in its entirety, nor permanently). When considering the most appropriate locations for solar development, there are a number of requirements for a site to be viable and suitable. Other criteria include, but are not limited to:

- Suitable location which benefits from sunlight intensity levels.
- Suitable grid connectivity.
- Site of suitable shape, orientation and size that can accommodate the development proposal.
- Suitable location which is served by appropriate highway infrastructure.
- Suitable site which is available for the duration of the development.
- Not located within a sensitive area as defined by the EIA Regulations.

6.22. The site meets the criteria outlined above.

6.23. In a recent Appeal (APP/B3030/W/21/3279533) the Inspector acknowledged in the context of the scheme presented that, aside from the presence of electricity substation, the proposal would not result in the permanent loss of agricultural land and that one of the elements of site selection is the availability of the grid connection. In the case of this scheme, it is not

considered that the introduction of solar arrays on this land will degrade that land so that it is not able to be used for agricultural purposes following the decommissioning of the site.

- 6.24. As such, whilst the proposal will result in the temporary loss of a small portion of BMV land, when considered against the other significant benefits associated with the development, the planning balance makes the harm acceptable in planning terms.
- 6.25. It is therefore considered that the proposed development accordance with Policies CS9 and CS34 of the Local Plan Core Strategy.

### **Landscape and Visual Amenity**

- 6.26. The site is located within a rural area to the south of Cromhall. The site lies outside of any nationally designated landscape (National Parks, AONBs), with the Cotswolds AONB lying over 5km to the east of the site. The site also lies outside of any locally designated landscapes. It is not therefore envisaged that there would be any notable impact on designated landscapes as a result of the proposed development.
- 6.27. The site is covered by the South Gloucestershire Landscape Character Assessment Supplementary Planning Document (2014). The majority of the site lies within the northernmost section of the 'Yate Vale' Landscape Character Area, with the northernmost section of the site lying within the southernmost section of the 'Falfield Vale' Landscape Character Area.
- 6.28. The site comprises of a series of irregular shaped agricultural fields, divided by mature hedgerows which include trees. Several individual mature trees also lie within the fields, with a small block of woodland, known as Lake Copse lying towards the southern part of the site, but excluded from the site boundary. The landscape is almost entirely flat in its profile, lying around 60m AOD.
- 6.29. The site is crossed by two footpaths. One route (OCR/17) crosses the northern part of the site on a broadly east-west alignment. The other route (OCR/18) crosses the south-eastern section of the site and runs on towards Wickwar. A number of other footpaths also run in relatively close proximity to the site. There are no individual residential properties or farmsteads in immediate proximity of the site, but the settlements of Heath End and Talbot's End both lie within 1km, to the north and west respectively. The site is bounded along its north-eastern edge by a minor road, Lake Lane which comes to a dead end at the boundary of Wickwar Quarry. To the west, the B4058 runs 200m to the west of the site as it passes south into Heath End and another minor road runs into Talbot's End.
- 6.30. Policy CS1 of the Core Strategy states at part 3 the development proposals will be required to demonstrate that: "*existing features of landscapes, nature conservation, heritage or amenity value and public rights of way, are safeguarded and enhanced through incorporation into the development.*"
- 6.31. Furthermore, Policy PSP2 of the Policies, Sites and Places Plan states:
- "Development proposals will be acceptable where they conserve and where appropriate, enhance the quality, amenity, distinctiveness and special character of the landscape (defined by the Landscape Character Assessment). This includes, but is not limited to:*

- *landscape attributes which define the inherent character of an area, such as: landscape patterns arising from roads, paths, hedges, waterways and buildings; designed and natural landscapes, which include elements of natural beauty, historical or cultural importance and ecological features;*
- *the tranquillity of a landscape, sense of place and setting;*
- *landscape features, such as trees, hedgerows, woodlands, views, banks, walls, ponds and waterways;*
- *distinctive or characteristic topography and landforms."*

6.32. A Landscape and Visual Impact Assessment (LVIA) has been prepared to accompany this planning application and confirms that the scheme can be effectively integrated and assimilated into the surrounding landscape with the adverse effects highly localised to the immediate environs only. The rural character of the medium and distant landscape would be no changed and would be preserved. This document is supported by a landscape masterplan that takes account of the identified areas of sensitivity by providing additional planting where required. Care has been taken to retain existing trees and hedgerows where possible; to retain the character of the local area; to maintain existing visual buffers; and the maintain biodiversity value.

6.33. The proposed development has been considered to fit well into the existing field pattern and scale of landscape, does not negatively altering the field boundaries, and being respectful of the existing landscape features that characterise part of the landscape. The existing landscape character has been judged to be robust enough to withstand the introduced changes.

6.34. With regards to cumulative impact the proposed development has been considered against the approved solar farm at Newlands Farm, Wickwar, located to the south of Cowslip Lane. This assessment concludes that the introduction of the proposed development would result in a minor adverse cumulative effect upon the character of the Landscape Character Area 8 Yate Vale i.e. that between the proposed scheme and approved scheme.

6.35. It is therefore considered that the proposed development is consistent with the requirements of Policy CS1 of the Local Plan Core Strategy and Policy PSP2 of the Policies, Sites and Places Plan.

### **Trees and Landscaping**

6.36. When considering landscape character, Policy PSP3 of the Policies, Sites and Places Plan states:

*"Development proposals should minimise the loss of existing vegetation in a site that is of importance in terms of ecological, recreational, historical or landscape value.*

*Development proposals which would result in the loss of, or damage (directly or indirectly) to, existing mature or ancient woodland, veteran trees, ancient or species-rich hedgerows will only be acceptable where the need for, and benefits of, the development in that location clearly outweigh the loss or damage.*

*Development proposals should, where appropriate, include:*

- *the protection of trees; and*
- *replacement trees, of an appropriate size and species, where tree loss or damage is essential to allow for development; and*
- *additional tree planting, in accordance with Core Strategy Policy CS1 and the Landscape Character Assessment SPD's, including, but not limited to, planting along arterial roads, in car parks and in the public realm; and*
- *new planting schemes that retain and integrate healthy, mature trees and hedgerows, and include native species."*

6.37. The proposed development has been designed to retain existing trees and hedgerows on site, only extending existing gaps in the hedgerows for the purpose of construction access. The application is supported by an Arboricultural Survey Report that concludes that the developable site is focused within the interior of existing agricultural fields and therefore are relatively free from arboricultural constraints. On this basis, the development of the site to provide a solar farm is feasible from an arboricultural perspective.

6.38. As such, it is considered that the development is in accordance with Policy CS1 of the Core Strategy and Policy PSP3 of the Policies, Sites and Places Plan.

#### **Ecology and Biodiversity**

6.39. There are no internationally designated sites within 5km of the proposed development site. The nearest internationally designated site is the Severn Estuary which is located approximately 9.9km northwest and is designated as a Special Area of Conservation ("SAC"), Special Protection Area ("SPA") and Ramsar Site. The SAC is designated for five qualifying wetland and marine habitats and three lamprey and fish species. The SPA qualifies for designation due to its wintering populations of Bewick's swan, overall waterfowl numbers, and migratory waterbird populations. The above habitats and waterbird numbers are also the reason for its designation as a Ramsar site, together for its importance for other fish including salmon and sea trout. It is considered that the proximity and distance from this designated site means that the development is in accordance with Policy PSP18 of the Policies, Sites and Places Plan.

6.40. The NPPF identifies that planning policy should identify and pursue opportunities for securing measurable gains for biodiversity. In accordance with the objectives of the South Gloucestershire Biodiversity Action plan 2016–2026, biodiversity net gains are also being considered in the design of the proposed development and will be informed by ongoing ecological baseline surveys.

6.41. Policy PSP19 of the Policies, Sites and Places Plan identified that,

*"Development Proposals resulting in the loss or deterioration or irreplaceable habitats, including unimproved grassland (lowland hay meadows), ancient woodland, and ancient trees will be refused unless the need for, and benefits of, the development in that location clearly outweigh the loss.*

*Where appropriate, biodiversity gain will be sought from development proposals. The gain will be proportionate to the size of the scheme and be secured through an appropriate planning condition or legal undertaking. This will include sites of low nature conservation interest (for example, intensive agricultural land) where new semi-natural habitat (green infrastructure) would provide opportunities and gains for local wildlife."*

- 6.42. The application is supported by a preliminary ecological appraisal that summarises the potential ecological constraints to the development. This report concludes that hedgerows will be retained where possible however, some removal will be required to facilitate access across the site. However, the amount of hedgerow to be removed is unlikely to have a significant impact on the hedgerows, however the loss of this habitat should be mitigated for by hedgerow planting and enhancement. Hedgerow management will continue in line with the current management and gaps will be infilled elsewhere, mitigation for the minor hedgerow loss. The Landscape Mitigation Strategy Plan and Ecological Enhancement Plan shows the following enhancements including, but not limited to:
- Grassland under and around the solar arrays in the two arable fields will be sown to a mixed native grassland with wildflower species and will be managed through low intensity grazing by sheep.
  - Buffers and other retained areas outside the solar arrays will be enhanced for wildlife. These will be seeded with wildflower mix and managed through rotational cutting every two to three years.
  - An area of blackthorn scrub has been added on site.
  - Enhancement of 3 existing ponds on site and creation of a new small pond adjacent to the Public Right of Way (PROW)
  - Proposed implementation of bat boxes, barn owl box, kestrel box and habitat piles
- 6.43. The supporting Ecological Appraisal outlines the biodiversity net gains that can be achieved on site. This concludes that there is a 14.61% net gain in habitat units on site and a 19.94% net gain in hedgerows units on site. The details of the habitat creation and ongoing management are detailed in the submitted Landscape Ecological Management Plan (LEMP).
- 6.44. Appropriate offsets from existing features on site have been reflected within the design of the scheme. It is considered that necessary mitigation has been reflected in the scheme. Where necessary a Construction Environment Management Plan (CEMP) can be conditioned to any planning consent.
- 6.45. As such, it is demonstrated that the scheme complies with Policy PSP18 of the Policies, Sites and Places Plan.

### **Heritage and Archaeology**

- 6.46. There are no designated heritage assets (listed buildings, conservation areas, scheduled monuments, world heritage sites, registered parks and gardens) within the proposed development boundary. It is however acknowledged that there are a number of listed buildings within the proximity of the proposed site boundary. To the north, along the line of Talbots End, approximately 200–250m north of the site boundary are six grade II listed buildings. Approximately 800m northwest of the proposed site boundary, beyond the B4058

Bristol Road is a grouping of 22 listed buildings, mostly grade II, and mostly associated with the grade I Church of St. Andrew. The majority of the 22 listed buildings comprise the locations of chest tombs within the graveyard of the church.

- 6.47. 218m to the west of the proposed site, located alongside the B4058 is a grade II listed Milestone at National Grid Reference ST6977 8999 (1321197). Further west, beyond the B4058 are two further listed buildings. The grade II Heathend Court (1114972) located 470m west and the grade II The Old Rectory (1114983) located 588m west. To the south of the proposed site, approximately 1km from the southern boundary are a small grouping of three grade II listed buildings: The Meads Farmhouse (1115053), 2 Gatepiers, 25 yards to north of The Mead Farmhouse (1321154) and Westend House (1137326).
- 6.48. Policy PSP17 of the Policies, Sites and Places Plan identifies that, "*development proposals should serve to protect, and where appropriate, enhance or better reveal the significance of heritage assets and their settings. They should be conserved in a manner that is appropriate to their significance.*"
- 6.49. The application is supported by a Heritage Statement which provides information with regards to the significance of the historic environment and archaeological resource of the site. This report assesses the implication of the scheme on both archaeological potential and built heritage assets.
- 6.50. The submitted Heritage Statement (RO04v1 HT) reviews the potential harm to the heritage significance of Talbot's End House (Grade II Listed) and The Gables (Grade II Listed) through changes to their setting. This report does not identify any harm to either of these Listed Buildings. No other designated heritage assets were potentially sensitive to the proposed development of the site.
- 6.51. In terms of archaeology, a geo-physical survey has been undertaken on the site and full details are provided. It is concluded that the features identified are considered to be of limited archaeological interest. The potential for significant unrecorded archaeological remains dating to the early medieval, medieval, post-medieval, early modern, or modern periods within the site is low.
- 6.52. As such, it is considered that the proposed development is in accordance with the requirements of Policy PSP17 of the Policies, Sites and Places Plan and the relevant paragraphs of the NPPF.

### **Highways and Transport**

- 6.53. As detailed on the submitted Infrastructure Layout Enlargements (Figure 5 -Drawing Reference O4886-RES-LAY-DR-PT-004 RevO), access to the site will be obtained from Talbots End to the north of the site via an existing farm track. The full extent of the route for constructions traffic is detailed within the submitted Construction Traffic Management Plan.
- 6.54. Whilst it is acknowledged that there will be an increase in highways movement during the construction period, it is not anticipated that outside of this time, the proposed development will accrue a high number of trips.
- 6.55. The submitted Construction Traffic Management Plan has been submitted in support of the application. This document sets out the framework for managing movement of traffic associated with the proposed development in order to mitigate against the effects of traffic

travelling to and from the site during the construction period. It is considered that the implementation of the recommended mitigation strategy, the construction of the site will not have any unnecessary negative impacts on the local highways network.

- 6.56. As such, it is considered that the proposals are in accordance with Policy PSP11 of the Policy PSP17 of the Policies, Sites and Places Plan.

### **Flood Risk and Drainage**

- 6.57. The site is predominantly located within Flood Zone 1, an area identified as being at lowest risk of flooding. However, it is recognised that there is a southern and central area of the site is located within Flood Zones 2 and 3. However, the scheme has been designed to remove all infrastructure (with the exception of the arrays themselves) outside of sensitive areas.
- 6.58. Policy CS1 of the Local Plan Core Strategy outline at Point 11 that development proposals will be required to demonstrate that it has accounted for the South Gloucestershire Strategic Flood Risk Assessment and provide where appropriate, measurements to manage flood risk and prepare surface water management plans.
- 6.59. This is re-iterated in Policy PSP20 of the Policies, Sites and Places Plan that outlines the Council approach to surface water drainage and runoff rates, where applicable.
- 6.60. The application is supported by a Flood Risk Assessment that concludes that the proposed development will not add any significant areas of impermeable surfacing. It is important to note that although the panels will deflect precipitation, the panels will not increase the impermeable area of the site. There is deemed to be no increase in flood risk from the proposed development. During times of flooding infrastructure will be installed at a suitable height above existing ground levels to avoid contact with flood waters.
- 6.61. In terms of the drainage strategy for the site, it is proposed to retain the existing agricultural drains within the site allowing the site to drain naturally. All access tracks will be constructed out of gravel or grass reinforcement or would simply be a mown path for vehicles to gain access to panels for maintenance.
- 6.62. It is therefore considered that the proposals are in accordance with Policy CS1 of the Core Strategy and Policy PSP20 of the Policies, Sites and Places Plan.

### **Noise**

- 6.63. Policy PSP8 of the Policies, Sites and Places Plan states:
- "Development proposal(s) will be acceptable provided that they do not create unacceptable living conditions or have an unacceptable impact on the residential amenity of occupiers of the development or of nearby properties.*
- Unacceptable impacts could result from (but are not restricted to):*
- d. noise or disturbance"*
- 6.64. The proposed development has sought to locate inverters and the substation at a sufficient distance from the nearest residential receptors. The application is also supported by a Noise Impact Assessment. Noise surveys were undertaken to monitor the levels at the nearest



noise sensitive receptors. Fixed noise limits have been proposed, to which all future items of fixed plant should adhere. It is considered that this can be controlled through the imposition of a suitably worded condition.

- 6.65. With the necessary limits in place, it is not considered that the scheme will have negative implications on the nearest residential receptors and is therefore in accordance with the requirements of Policy PSP8 of the Policies, Sites and Places Plan.

### **Minerals**

- 6.66. It is acknowledged that the site is located within an identified Mineral Safeguarding Area in the Local Plan. It is understood that the area is likely to be a resource area quarried for sandstone, although this is something that is likely to be extracted in the west of England in the forthcoming period.

- 6.67. Policy PSP24 of the Policies, Sites and Places Plan states:

*"Within these defined areas, development proposals for non-mineral development will be acceptable where it is satisfactorily demonstrated that:*

- i. They do not sterilise, or unduly restrict, the future extraction of mineral deposits; or*
- ii. The mineral resource is no longer of value or potential value for safeguarding; or*
- iii. It is not practicable or environmentally acceptable to extract the mineral resource prior to the proposed development; or*
- iv. The development is temporary and would be completed and removed, and the site restored to a condition that does not inhibit extraction of the mineral within the timescale that the mineral resource is likely to be needed; or*
- v. There is an overriding need for the development, which outweighs safeguarding or prior extraction of the mineral deposit; or*
- vi. The mineral resource would not be sterilised by the development.*

*If planning permission is to be granted for non-mineral development within the MSA, applicants must demonstrate that the opportunity to recover mineral resource present has been considered. The prior extraction of mineral, where it is practicable and environmentally acceptable to do so, will be encouraged."*

- 6.68. The application is supported by a Minerals Safeguarding Assessment that acknowledges that the development is limited in timeframe, with a lifespan of 40 years after which time the site would be returned to its current conditions and use. As such, the development will not permanently sterilise any mineral resource should they exist.

- 6.69. As such, it is confirmed that the that the application is in accordance with Policy CS 10 of the Local Plan Core Strategy and Policy PSP 24 of the Local Plan Policies, Sites and Places Plan.

### **Glint and Glare**

- 6.70. The extent to which the proposed development will have an impact on light sensitive receptors have been assessed within a Glint and Glare report. Generally, solar photovoltaic (PV) system are constructed of dark, light-absorbing material designed to maximise light absorption and minimise reflection.
- 6.71. This report concludes that the proposed development does not pose any risks towards any of the assessed/considered light sensitive receptors, namely nearby dwellings, road infrastructure and aviation.

## 7. PLANNING BALANCE

- 7.1. To summarise, the above planning assessment has demonstrated the following:
- This planning application is in broad compliance with the Development Plan and national planning policy and guidance. Policy compliance strongly supports planning permission being granted;
  - The development and operation of the solar farm would give rise to a wide range of social, environmental and economic benefits which amount to a very substantial weight in favour of planning permission being granted (against what are very limited effects);
  - The impacts associated with the development at this location are potentially limited, and the proposal is in compliance with relevant issue specific planning policies in the Development Plan, so do not weigh against the development.
- 7.2. Whilst it is accepted that the proposal will result in changes to the local environment, such as in terms of visual impact, those changes are not such that would constitute a breach of the policies contained within the Development Plan. This is also the case where any identified harm can be addressed by way of a planning condition, such as matters of landscaping, ecological mitigation and enhancement. The principal policies for this type of application are CS3 of the Cores Strategy and PSP6 of the Policies, Sites and Places Plan. This application, as summarised by this planning statement, has demonstrated accordance with these policies and others within the wider Development Plans. Consequently, there is accordance with the guidance contained within the NPPF, NPG and draft national policy ENV3.
- 7.3. Notwithstanding this accordance with the development plan, the change to the local environment could be perceived as being harmful. This statement has set out the benefits of the proposal and these are substantial in their weight (particularly in combatting climate change and meeting ambitious targets for renewable energy production). As such, those benefits can be regarded as further supporting the acceptability of the scheme against the Development Plan or should a more pessimistic view be taken as being capable of outweighing any conflict with the Development Plan (which we do not consider there to be). It is noted that there is a loss of a limited amount of Grade 3a (BMV) agricultural land, it is considered that the benefits of the scheme far outweigh the limited loss associated with the development. As discussed above, Draft National Policy Statement EN-3 that developers consider several factors when considering the location and layout of sites including solar irradiance, proximity to available grid capacity to accommodate the scale of generation, predominance of open land, topography, previous land use and the ability to mitigate



environmental impacts and any flood risk. Therefore, it is not considered that the absence of BMV should not be a predominant factor in determining the suitability of site selection. This should be considered on balance, with all benefits arising from the scheme.

- 7.4. The benefits of a solar scheme of this scale can be listed as, but not limited to:
- Increased renewable energy generation, equivalent to provide electricity to assist towards reducing CO<sub>2</sub> emissions per annum.
  - Economic benefits associated with investment and support for on-site employment during the construction period and with associated management and maintenance of the scheme.
  - Appropriate biodiversity and landscape enhancement via increased boundary planting and species-rich grassland resulting in a gain in biodiversity across the site.
  - Reduction in carbon emission has a consequential positive effect upon public health and community benefits, via the reduction in greenhouse gases.
- 7.5. In consideration of compliance with the Development Plan and other planning policy requirements, the significant benefits associated with the Proposed Development and limited adverse effects, it is clear that this development is, on balance, acceptable in planning terms.
- 7.6. The Proposed Development has been shown to achieve the main objectives of sustainable development (environmental, social and economic) without causing undue detriment to any of these matters. The presumption in favour of sustainable development set out in the NPPF therefore applies here. As the NPPF directs, in such circumstances and where the application complies with the Development Plan, the application should be approved without delay.

## 8. SUMMARY AND CONCLUSIONS

- 8.1. This Planning Statement has been prepared by Pegasus Group on behalf of RES Ltd in support of the accompanying application for full planning permission for a solar farm on land at Varley Farm.
- 8.2. The proposed development would involve the construction of a ground mounted solar farm with associated security fencing and buildings within the application site. The solar farm will have a capacity of up to 25MW.
- 8.3. The development supports the UK Government's intention to move to a low carbon economy, which represents a substantial benefit. The impacts of the proposal have been shown to be acceptable and, where necessary mitigation measures have been set out to reduce potential impacts of the proposed development.
- 8.4. The significant benefits associated with this proposal, primarily through the generation of renewable energy to provide low carbon electricity and a valuable contribution towards meeting the challenging obligations of the Government regarding renewable energy generation, and also in the form of economic investment and ecological and landscape enhancements, are factors which weigh heavily in favour of this development.
- 8.5. This statement therefore demonstrates that, upon considering the following matters, this proposal, on balance falls well within the scope of acceptability:
  - broad compliance with the Development Plan and national planning policy guidance.
  - the significant benefits associated with the scheme; and
  - the relatively benign impacts associated with the development.
- 8.6. Accordingly, this proposal represents sustainable development and, as such, this planning application should be approved without delay.

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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