

DEVELOPMENT MANAGEMENT COMMITTEE 18 DECEMBER 2023

Case No: 22/00668/FUL
Proposal: Installation of a solar park to export up to 25 MW (AC) electricity, comprising up to 65,000 photovoltaic panels, 10 inverter/transformer cabins associated works.
Location: Land North East Of Bates Lodge, Peterborough Road. Haddon
Applicant: Ms Charlotte Peacock (Wessex Solar Energy Ltd)
Grid Ref: (E) 512694 (N) 293208
Date of Registration: 13/05/2022
Parish: Haddon

RECOMMENDATION –

Delegated powers to APPROVE subject to conditions.

This application is referred to the Development Management Committee (DMC) in accordance with the Council’s Scheme of Delegation, at the request of the Chief Planning Officer, on the grounds of the level of local interest.

1. DESCRIPTION OF SITE AND APPLICATION

- 1.1 The application site comprises approximately 46ha of agricultural land, situated in two parcels north and south of the A605, with the bulk of the site being to the south. The site is wholly within Haddon Parish, and Chesterton and Elton Parishes border the north and west edges of the northern part of the site, respectively.
- 1.2 Along the western edge of the northern parcel, running north to south, is Billing Brook, located within flood zones 2 and 3a, that cover the western most edges of the site. Those areas run concurrently with areas identified as being at risk from surface water flooding at the 1 in 30 and 1 in 100 year event category. A number of areas to the edges of the site are noted as being within areas at risk of ground water flooding in a 1 in 1000 year event.
- 1.3 A permissive path runs along the north edge of the northern parcel, with Bridleway 111/8 running partially along the western boundary into the site terminating midway in the field. These Public Rights of Way (PROWs) connect to others to the north and east of the northern parcel. The site is located within the Brickclay Mineral Safeguarding Area and along the eastern boundary of the northern half of the site runs an oil pipeline.
- 1.4 The proposed connection to the electricity network runs to the east of the site, along an agricultural track, before reaching and running to the east along Haddon Road. It crosses 2no. PROWs, Bridleway 111/5 and Footpath 111/2 and terminates at Toons Lodge. The application notes further connections would be made through underground cables into the

wider grid network, carried out by a Statutory Undertaker who has separate statutory powers to carry out these works, and therefore do not form part of this application.

- 1.5 Topographically, the site slopes down from east to west, reflective of the general landscape of this area that rises and falls in noticeable peaks and valleys. The site is located within National Character Area (NCA) 88: Bedfordshire and Cambridgeshire Claylands, and within the Northern Wolds Landscape Character Area as identified in the adopted Landscape and Townscape SPD 2022. Along the boundaries of the site is established planting, predominantly hedgerows, with some intermittent trees, though with trees mostly sited around the areas of the site close to the A605 and along Billing Brook.
- 1.6 There are a number of designated heritage assets in the surroundings, with the closest being the Grade II* St Marys Church in Haddon, sited approximately 800m from the edge of the site where solar panels are proposed. Approximately 950m to the north is a Schedule Ancient Monument, a Roman Barrow, and approximately 1100m to the north west are a pair of Grade II listed buildings that form part of Sheepwalk Farm.
- 1.7 As amended, the application proposes the erection of ground mounted solar panels across most of the site, with a bank of panels being approximately 12.5m in length, 6.2m in depth, with the maximum height of the panel being 3.5m. Panels would be sited in rows, with gaps of 0.2m between each bank, and sited on regularly spaced columns that penetrate the ground. The exact depth of the mounting column will vary across the site due to topographical changes and to accommodate varying soil constraints but is indicatively shown as 2m.
- 1.8 The application also proposes 10no. cabins to house inverters and transformers, measuring 2.6m in width, 10.4m in depth and 3.2m in overall height with a flat roof. The proposed security fencing and gate to the perimeter of the solar panels measures approximately 2m in overall height. Engineering operations are proposed to create new swales, and to create the route needed to run cables that will attach to the network to the east, close to Haddon House and Toons Lodge. A single control building is proposed within the site, measuring 7m in width, 3m in depth, 4m in overall height and 3.5m to the eaves.

2. NATIONAL GUIDANCE AND POLICY AND RELEVANT LEGISLATION

- 2.1 The National Planning Policy Framework 2023 (NPPF) sets out the three economic, social and environmental objectives of the planning system to contribute to the achievement of sustainable development. The NPPF confirms that 'So sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development...' (para. 10). The NPPF sets out the Government's planning policies for, amongst other things:
 - delivering a sufficient supply of homes;
 - achieving well-designed places;
 - conserving and enhancing the natural environment;
 - conserving and enhancing the historic environment.

- 2.2 The National Planning Practice Guidance (NPPG), the National Design Guide 2019 (NDG) and the Noise Policy Statement for England (NPSE) are also relevant and a material consideration.
- 2.3 For full details visit the government website [National Guidance](#).
- 2.4 Relevant Legislation;
- Planning and Compulsory Purchase Act 2004
 - Town and Country Planning Act 1990 (as amended)
 - Planning (Listed Buildings and Conservation Areas) Act 1990
 - Ancient Monuments and Archaeological Areas Act 1979

3. LOCAL PLANNING POLICIES

- 3.1 Huntingdonshire's Local Plan to 2036 (Adopted 15th May 2019)
- LP1 Amount of Development
 - LP2 Strategy for Development
 - LP3 Green Infrastructure
 - LP4 Contributing to Infrastructure Delivery
 - LP5 Flood Risk
 - LP10 The Countryside
 - LP11 Design Context
 - LP12 Design Implementation
 - LP13 Placemaking
 - LP14 Amenity
 - LP15 Surface Water
 - LP16 Sustainable Travel
 - LP17 Parking Provision and Vehicle Movement
 - LP19 Rural Economy
 - LP29 Health Impact Assessment
 - LP30 Biodiversity and Geodiversity
 - LP31 Trees, Woodland, Hedges and Hedgerows
 - LP34 Heritage Assets and their Settings
 - LP35 Renewable and Low Carbon Energy
 - LP36 Air Quality
 - LP37 Ground Contamination and Groundwater Pollution
- 3.2 Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 (Adopted July 2021)
- Policy 5 Mineral Safeguarding Areas (MSAS)
- 3.3 Supplementary Planning Documents (SPD)
- Huntingdonshire Landscape and Townscape Assessment – Adopted 2022
 - Huntingdonshire Design Guide – Adopted 2017
 - Cambridgeshire Flood and Water SPD – Adopted 2017
 - RECAP Waste Management Design Guide (CCC SPD) – Adopted 2012
 - Developer Contributions – Adopted 2011 (Costs updated annually)
- 3.4 Overarching National Policy Statement for Energy EN-1 (2023)
- 3.5 National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)

- 3.6 *Officer note – National Policy Statements, with those relevant to this application set out in paras 3.4 and 3.5 above, are primarily produced to support the National Significant Infrastructure Project (NSIP) regime. However, both identify that they may be material planning considerations in standard planning applications, but it is for the decision maker to consider the level of weight that should be attributed to them in each circumstance. Noting the scale of development that they are specifically produced to support; officers consider the adopted local plan policies should take primacy in consideration.*
- 3.7 For full details visit the Council's website [Local policies](#).

4. PLANNING HISTORY

- 4.1 21/70004/SCRE - Proposed solar park and associated infrastructure across a 43.3ha (approx. 107 acres) site. Screening Opinion Adopted 02/02/21 – Concludes the development is not EIA.

5. CONSULTATIONS

- 5.1 Haddon Parish Council – No comments received.
- 5.2 Elton Parish Council (Copy of latest comments attached) – Objection. The proposed solar park would not accord with local plan or landscape policies. The development will destroy the historic landscape and harm views that are available for significant distances. The development will massively reduce ecological biodiversity and adversely affect wildlife. Reflections from the panels could compromise flying safety. The development will destroy the ability of the good quality agricultural land to produce food. The construction will permanently damage the land beyond reasonable prospect of long-term recovery and is likely to cause traffic issues along the A605. Any approval should require a legal agreement that returns the land to agricultural on cessation of use and prevent further development and require the re-engineering of junctions to ensure construction vehicles do not stray into villages. No assessment of potential alternative locations has been carried out. The latest amendments have not addressed the fundamental objections to the development.
- 5.3 Chesterton Parish Council (Copy of latest comments attached) – Recommend neither approval nor refusal but concludes HDC has more expertise to judge the application. The Parish Council supports and promotes green energy. The integrity of the local plan should be upheld in recognising the value of the landscape in this area, which is situated across undulating 'clay vale' landscape. The Huntingdonshire Design Guide suggests that designs should be sensitively located to not overwhelm the landscape and avoid high points. There are queries regarding the impacts of light reflection or pollution on highway and aircraft safety, and why the inverter/transformer cabins are not better related to solar panels they serve. It is assumed a time limit will be set on the life of the contractors compound.
- 5.4 Alwalton Parish Council (Copy of latest comments attached) – Objection. The application is not in accordance with the adopted local plan. The development will be detrimental to the local area through harm to landscape, loss of ecology and biodiversity and loss of agricultural land.

Solar panels could be sited on alternative brownfield sites. The A1 motorway currently forms a boundary between industrial development in Peterborough and the rural countryside.

- 5.5 CCC Lead Local Flood Authority (LLFA) – No objection following revised details. The submission has demonstrated surface water can be managed through the use of permeable paving, swales and filter strips to restrict discharge to below greenfield equivalents. The measures proposed will also provide water quality treatment which is important when discharging into a watercourse.
Conditions are recommended requiring the submission of the full detailed design of the drainage scheme, requiring details for its long term maintenance and requiring details of how surface water runoff will be managed during construction.
- 5.6 Environment Agency – No objections subject to securing the mitigation measures in the submitted Flood Risk Assessment that all development is located outside Flood Zones 2 and 3.
- 5.7 HDC Landscape Officer – No objection following revised planting plans. It is considered the landscape has the capacity to absorb the development, and that the proposed planting, subject to a fully detailed planting plan being submitted, will provide adequate mitigation for the landscape impacts, and a suitable level of screening.
- 5.8 HDC Conservation Officer – No objection. The solar farm is screened from the majority of nearby heritage assets by the flanking ridges of Chesterton Hill, Stock Hill and Morborne Hill. The wider setting of nearer assets will see change but the siting will limit impact and the immediate settings will be preserved. Any minor harm would be modest, less than substantial and more than outweighed by the public benefits of the proposal.
- 5.9 Natural England – No objection. It is unlikely the proposed development, if temporary, would lead to significant permanent loss of best and most versatile (BMV) agricultural land. Although some components of the development may permanently affect agricultural land this would be limited to small areas. It is important that appropriate management of the soil is carried out to ensure it retains its long term potential as a future resource.
It is recommended that any application is granted subject to conditions to safeguard soil resources and to secure appropriate agricultural and biodiversity land management during the lifetime of the development, and to require the site is decommissioned and restored to its former condition when permission expires.
- 5.10 CCC Definitive Maps Team – No objections. It is understood the applicant is leasing the land and it is not within their gift to dedicate a new or additional Right of Way. The best alternative is for a permissive route to be provided and the applicant proposes a 4m wide circular permissive bridleway around the north plot. To ensure that is protected as part of the development conditions are recommended requiring the full detailed design is submitted and approved, that no fencing is erected within 0.5m of the permissive bridleway and that no planting is erected within 2m.
- 5.11 Designing Out Crime Officer – No objections. Recommend the proposed fencing is to LPS1175 SR2 standard. Recommend the CCTV images are stored for evidential purposes. Recommend a lighting plan is provided

when available, designed by a fully qualified lighting engineer to ensure the safety and security requirements are met with ecology and wildlife in mind.

- 5.12 British Horse Society (BHS) – Objection. BHS believes there is historical evidence of rights of way that are either unrecorded or under recorded within and surrounding the site. These have been submitted to the County Council as a Definitive Map Modification Order (DMMO) application and it is the BHS position that these are legal bridleways that must be considered in this application and it should not progress until a decision has been made. It is noted that the applicant proposes improvements to Bridleway 111/5, but there are concerns that works to this will undermine the quality of that surface, and further information should be provided. Conditions are requested that address widths, lack of obstruction and traffic management in relation to bridleways.
- 5.13 Hunts Ramblers Association – Objection. Support the comments of the BHS. The Hunts Ramblers wish to ensure any permission granted protects the rights of walkers.
- 5.14 Exolum (Oil Pipelines) – No objection. The proposed development will not affect the onsite apparatus. It should be noted that the developer may require a Works Consent.
- 5.15 CCC Historic Environment Team – No objections. The proposed works do not impact archaeological deposits or features.
- 5.16 Wildlife Trust – No objection. The submitted reports cover all relevant issues and follow established best practice. They include appropriate avoidance, mitigation and enhancement recommendations and should be conditioned if the application is approved. It is likely the net gain calculation would be lower than indicated, as the grassland habitats created are commonly poorer than predicted. However, the scheme still achieves significant positive net gain, and there are no biodiversity or ecological reasons to refuse the application.
- 5.17 CCC Local Highway Authority (LHA) – No objections following confirmation that an appropriate Construction Traffic Management Plan can be secured by condition that includes a left turn in and out arrangement. Recommend conditions restricting the provision of fences and gates, requiring provision and retention of visibility splays, that the width, depth, material, and form of accesses and their construction accords with specific requirements and County specification, that internal parking and manoeuvring areas are retained, that details of any temporary construction facilities to be submitted and that a revised Construction Traffic Management Plan is submitted.
- 5.18 HDC Environmental Health Officer (EHO) – No objection. Noise generated during the construction phase can be controlled through a Construction Environment Management Plan, which is recommended to be conditioned, and during the operational phase minimal noise will be generated.
- 5.19 CPRE – Objection. The proposal is not compliant with national or local policy. The proposal will remove agricultural land from production. There will be significant adverse impacts on residential and visual amenity. There will be a risk to safety on local roads. There will be unacceptable

levels of harm to local landscape and significant harm to historic landscapes. The proposed mitigation is inadequate and will not reduce negative impact to the most sensitive receptors. Security lighting will disturb residents and wildlife. There will be a safety risks to users of the Rights of Way. Security fencing will be inconsistent with the landscape. CCTV will be an invasion of privacy. There is not clarity around possible installation of lithium-ion batteries. There is no detailed plan for decommissioning. Funding for decommissioning must be available and secured in advance of construction commencing. A lifecycle carbon analysis has not been carried out.

6. REPRESENTATIONS – Done to 30th Oct 2023

- 6.1 Elected Members (HDC Cllr Alban, Cllr Beuttell; CCC Cllr Bywater; MP Shailesh Vara; full copies available on Public Access); Objection. The development will create significant scarring and destruction of the landscape with visual impacts for considerable distances along one of the highest points in Huntingdonshire. The loss of productive agricultural land adversely affecting food security. There will be considerable soil damage and pollution to the land and Billing Brook. The development will reduce biodiversity of the area and its operation will result in pollution that threatens protected species, including Great Crested Newts that have been identified in the Brook. There is a risk of glint and glare affecting aviation safety from the nearby airfields. There is a potential road safety and congestion issue from the construction deliveries using the A605 that will likely lead to fatalities. The construction and decommissioning of the solar panels will contribute to emissions and air pollution and the panels contain toxic materials that result in pollution. The materials used in solar panels are not renewable. There is concern electromagnetic interference has hidden or unknown risks to traffic on the A605. There is no detail on the risk of fire caused by solar panels. There are no detailed plans on decommissioning the site and concerns the development will become abandoned.
- 6.2 106no. objections received, raising the following summarised material points;
- The development should not utilise agricultural land.
 - The land has good agricultural value that is needed to support food production.
 - There is insufficient information on the connection between the two parts of the development across the A605.
 - The security fencing will be visually intrusive to the rural environment.
 - The development will cause harm to the surrounding area.
 - The benefit of the development does not outweigh the harm.
 - There will be a loss of land and habitat for wildlife.
 - There will be significant harm to the local landscape.
 - The timescale for the development will mean it will likely become irreversible.
 - There will be considerable soil damage and pollution to the land and to Billing Brook.
 - There is potential risk to aviation safety for surrounding airfields.
 - No details are available on how the decommissioning of the proposal.
 - There is evidence of protected Great Crested Newts within Billing Brook.

- There will be safety risks to aircraft through glint and glare.
- The A605 is a fast-moving road not appropriate for construction traffic.
- There are major visual amenity impacts to neighbouring residential properties.
- There is no assessment of the emissions from the manufacturing of the solar panels.
- Deliveries from the A605 during construction will lead to highway safety issues.
- There has not been adequate public consultation from the applicant.
- The development is contrary to the Local Plan.
- The local area suffers from flooding that will be exacerbated by the development.
- The area is used regularly by walkers and cyclists.
- The development will adversely impact users of surrounding open spaces to the detriment of public health.
- There have been several fatalities along the A605 and the level of construction traffic generated will adversely impact highway safety further.
- The development is unlikely to generate a significant amount of electricity and any generated will be intermittent.
- The proposal may lead to drainage issues.
- Availability of food is more essential than electrical power availability.
- The proposed development is contrary to the adopted Supplementary Planning Documents due to its prominent location and scale.
- The road network will require improvements to support the development.
- There is nothing to control vehicle movements related to the development onto the A605.
- There is a safety concern with Battery storage located close to Billing Brook that is known to flood.
- There are national shortages in world food supply such that agricultural land should not be lost.
- The development will give rise to carbon emissions.
- The solar farm will be visually intrusive into the area.
- There is a high risk of pollution associated with the development.
- There are a number of protected species on and adjoining the site that will have their habitat disrupted or destroyed.
- The site is one of the few highpoints in the area and is therefore visible from considerable distances.
- It is unlikely all elements of the proposal will be removed once decommissioned.
- There will be a loss of trees and hedges on the site.
- The application does not sufficiently show the land level changes across the site to demonstrate its impacts.
- The application has not demonstrated the impacts of long-term chemical use proposed as part of the maintenance programmes.
- Cambs Police have requested a lighting plan, and any lighting would result in significant light pollution in the area.
- The viewpoints used in the submitted Landscape and Visual Impact Assessment do not include the most impacted views.
- The solar panels will result in electrical interference with surrounding communications networks.

- The proposal is contrary to national planning guidance.
- Concerns the development will give rise to land instability.
- The development will not contribute to long term employment in the area.
- There will be no net gain in biodiversity.
- The development will interfere with Public Rights of Way in the area.
- Glint and glare from the development will lead to highway safety issues.
- The proposal is out of character with the area.
- The development will result in an adverse urbanising impact.
- The application is likely to generate harmful light pollution.
- The development does not accord with the policies in the NPPF.
- Mitigation planting will not screen the development until late in its operational period.
- The proposed undertaking does not accord with the CIL Regulations and should be given limited weight.
- The length of time the development will be in place means little weight should be given to reversibility of the scheme.
- The development is not sustainable.
- The development will lead to harm to heritage assets through development in their setting.
- The development will adversely impact water quality in the area.
- The economic benefits of the proposal are overstated.
- Electricity generated is unlikely to be used locally.
- It will not be possible to screen the development.
- There is a risk to human health through the location of the solar panels.
- The site is a haven for wildlife and protected species that will be lost through the development.
- Concerns regarding the recyclable nature of the development.
- The Wildlife Trust consider the submitted information overrates the grassland habitat and net gain will be significantly lower.
- The proposed surface water mitigation is insufficient to prevent the significant risk of flooding.
- The site contains large areas of higher quality land at Grades 2 and 3a.
- Concern the proposal will result in an increased risk of crime in the area.
- The application has not included specific viewpoints that would experience significant adverse impacts.
- The submitted Landscape and Visual impact assessment underestimates the visual impact of the development which would not be acceptable and would not be capable of being made acceptable. *(Officer note – a third party review of the submitted LVIA was received and is considered elsewhere in this report.)*
- The visual impact of the development will harm amenity of nearby properties.
- The development is contrary to policy LP10.
- Funds to enable decommissioning should be secured at this stage and held until required.
- The development does not accord with National Policy Statement EN-1.
- Any planted screening along the boundaries will not be able to screen the entire development due to the topography of the land.

- Planting will take a significant length of time to develop to adequate levels.
- The site is considerable landscape quality.
- The development will harm the agricultural economy.
- No evidence of alternative locations has been provided.
- It is uncertain the proposed development is viable.
- Works have previously been carried out to Trees and Hedgerows (*Officer note – while this has been considered, it is not material that the applicant may have carried out works historically, only in-so-far as it relates to the current situation of vegetation on and around the site in considering landscape impact and the potential level of mitigation that might be required to make the development acceptable.*)

Officer note – 3no. objection were received anonymously in addition to those above. For the avoidance of doubt those objections carry minimal weight in the determination of the application. Notwithstanding, they raise no material points that were not already raised within other representations.

6.3 49 no. comments of support received, raising the following summarised material points;

- It is a priority to generate renewable energy, irrespective of the cost.
- This will contribute to carbon neutrality and improve energy security.
- Wildlife impacts appear to be minimal and other areas are devoted to increasing biodiversity.
- The development will accommodate multiple uses.
- The development is needed to support solutions to the global environmental crisis.
- The development has been carefully considered to minimise impact on the landscape.
- The proposed grazing on the land will promote regenerative farming.
- The planting around the edges of the solar park will bring benefits to biodiversity.
- There is a substantial amount of land in the UK devoted to agriculture and some can be shared with solar panels.
- The development will support reduction in greenhouse gas emissions.
- 80% of the land is classified as Grade 3b and less suitable for food production.
- The development will create construction and long-term maintenance jobs.
- The development is reversible and all equipment can be removed at the end of its life.

6.4 The following points have been raised that are not material considerations. Officer notes are *italicised* for explanation where necessary;

- The development will be visible from surrounding properties (*Officer note – that the development can be seen from a neighbouring property, and alterations to private views, is not a material consideration. Where the development may affect residential amenity, that has been assessed below.*)
- The development will reduce house prices. (*Officer note – This is a private land interest and not a material planning consideration.*)

- Impacts from existing issues (*Officer note – The development cannot address existing issues, only mitigate for its own impacts. Where there are impacts arising from the development, this has been considered below.*)
- Concerns regarding precedent for other proposals or future proposed extensions (*Officer note – Applications must be considered on their own merits. Speculation of future applications that may or may not be submitted is not material.*)
- Comments relating to who the applicant is.
- The panels will likely be outdated due to changing technology (*Officer note – This is speculative and cannot be given any weight in the determination of the application which must be based on policy and circumstances at the time of decision.*)
- Comments relating to the date of submission or any consultation period of the application. (*Officer note – The application is consulted on in accordance with statutory requirements.*)
- Solar Panels should be sited on industrial buildings. (*Officer note – This is not in the control of the LPA, is not a matter of policy, and is not a relevant consideration of this application which must be considered on its own merits.*)
- The Council's public access system does not show the correct number of responses received (*Officer note – this is a technical matter due to how the LPA is required to record comments for data protection reasons. Comments are instead shown within the documents tab, but this is no requirement to publish any comments received. A summary of all comments is included within this report.*)
- Comments relating to professional integrity of the applicant or any professional body that has carried out work on their behalf.
- Comments relating to the control building labelled 'option 2' (*Officer note – this building has been removed from the application and is no longer proposed. It is therefore no longer a matter for consideration in this application.*)
- The application site is not allocated. (*Officer note – The current Local Plan does not allocate solar farm development as it does with, for example, residential development. Applications must be considered on their own merit.*)
- The application should not have been accepted (*Officer note – The LPA has no power to refuse to accept or consider an application.*)
- Comments related to Areas of Outstanding Natural Beauty (AONB) (*Officer Note – The site is not within, adjacent or near to an AONB.*)
- Comments of a defamatory nature.
- Comments relating to the validity of any representations submitted.
- Comments relating to EIA development. (*Officer note – The development has been determined not to represent EIA development for the purposes of the relevant regulations, a copy of which can be publicly seen through Public Access under reference 21/70004/SCRE.*)
- Threat of Legal Challenge.
- Comments relating to any precedent set by any decision outside Huntingdonshire District. (*Officer note – the application must be determined on its own merits. References to decisions outside the district, determined on the policies relevant to that area, are not relevant to the assessment of this application under the policies relevant to this district.*)
- Comments relating to a lack of engagement by the applicant or landowner.

- Comments relating to the applicant's reason for submitting the application.
- Comments relating to the Landscape and Nature Recovery (LNR) Plan (*Officer Note – The LNR Plan is a programme which incentivises biodiversity enhancement projects for landowners and is not policy relevant to the determination of planning applications.*)
- Matters covered by legislation outside planning legislation. (*Officer Note – Such matters fall to the relevant body to enforce, and any relevant process or controls should not be duplicated.*)
- Comments relating to the reasons the applicant has made changes since any pre-application discussions.
- Information identified as part of a Freedom of Information Request (*Officer note – Any FOI can only relate to written records kept by the Council. Any information found or lack thereof is not preclusive of any discussions, it only indicates no formal records are available. Any information identified as part of an FOI, particularly carried out prior to submission of the application, does not preclude that the application is assessed on its own merits at the time of the application being submitted.*)
- Comments made on Television Programmes.
- Comments regarding potential requirement for further applications. (*Officer Note – The application as proposed is for consideration at this stage. It is for the developer to ensure they have adequate permissions for any further works that may be required, for example to connect to the grid.*)

7. ASSESSMENT

7.1 The main issues to consider in the determination of this application are:

- Principle of Development
- Character and Landscape
- Highway and Transport Impacts
- Public Rights of Way
- Impacts from Glint and Glare
- Ecology and Biodiversity
- Drainage and Flood Risk
- Impacts to Heritage Assets
- Impacts to Neighbouring Amenity
- Contamination Risks and Pollution
- Other Matters

7.2 The starting point for proposals, in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004 is that developments shall be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Principle of Development

7.4 This section is concerned with the broad principle of development for a renewable or low carbon energy generating scheme in the open countryside. More detailed, site-specific matters are considered elsewhere in the report.

- 7.5 The application site is located outside and built-up area and is therefore considered to be within the countryside for planning purposes. In such a location development is restricted under policy LP10 to those that are provided for in other policies within the Local Plan. The supporting text to that policy notes that this is in order to balance support for a thriving rural economy and land-based business, while protecting the character and beauty of the countryside.
- 7.6 Of particular relevance in this instance is policy LP35 which states that “a proposal for a renewable or low carbon energy generating scheme, other than wind energy, will be supported where it is demonstrated that all potential adverse impacts including cumulative impacts are or can be made acceptable”.
- 7.7 As stated above, LP35 provides support in principle for renewable and low carbon energy generation and is therefore considered by Officers to be one of the specific opportunities for development in the countryside supported in the local plan, subject to a detailed assessment of the proposal and its impacts. In terms of the countryside location, and notwithstanding further assessment in respect of the use of agricultural land, it is therefore considered there is in-principle policy support for the proposal in this location.
- 7.8 With respect to use, the application site currently comprises approximately 46ha of agricultural land. Policy LP10, (reflecting para 174b) of the NPPF, seeks to protect best and most versatile (BMV) agricultural land, classified as Grades 1, 2 and 3a from irreversible development.
- 7.9 Natural England have raised no objections to the proposal, and consider that, subject to conditions requiring details of decommissioning and safeguarding of the land quality, there would be no loss of BMV land.
- 7.10 A significant number of objections have been received from local residents, Elton Parish Council, Ward members and CPRE on the grounds that the land is fertile, good quality agricultural land that should be retained for food production.
- 7.11 The application has been accompanied by a report detailing Agricultural Land Classification (ALC) across the site. It concludes 20% of the site falls into Class 3a, with the remainder falling into Class 3b. Comments have raised concerns that there is a discrepancy between the size of the site, as the report refers to 41ha, whereas the site is approximately 46. The ALC report has not investigated the proposed cable run, which accounts for the discrepancy. Officers consider this is acceptable as the cable would be buried at sufficient depth that it would not prevent use of the land above it, and in any event, it largely runs along existing field access routes, as opposed to farmed agricultural land.
- 7.12 It is noted, and was highlighted in some comments received, that a single sample of soil was found to be Grade 2 land. The land surrounding that point is Grade 3b, and the Natural England ALC maps show that the closest Grade 2 land is some distance from the site. As such, it is considered this is an anomaly in that single sample point, and not an indication that there is land that falls into any higher category not accounted for.

- 7.13 The use of Grade 3b land for development is supported under policy LP10, as it is not BMV land. The remaining 8.3ha of 3a land falls the definition of BMV land. Policy LP10 is clear that development should seek to avoid irreversible loss of BMV land. This development that covers this land includes swales, an access track, fencing, solar panels and two inverter/transformer cabins. Of these elements, and having regard to a potential 'worst-case' scenario, the access track and the two inverter/transformer cabins would require some hardstanding and are likely to be more permanent fixtures, though the access track is of limited depth and officers do consider it highly likely this could be removed without any notable impact. The swales, fencing and solar panels are either relatively straightforward earthworks or temporary ground mounted structures that could be readily removed from the site once their use has ceased.
- 7.14 The remaining elements identified, the access track and inverter/transformer cabin hardstanding, would be minor in their scale at approximately 0.1ha, limited to the periphery of the field. A condition is recommended in accordance with LP35 that, prior to decommissioning, a plan is submitted to the LPA that sets out the approach to removal of the equipment, and that seeks to revert the land to its former status in accordance with that agreed plan as well as a condition will also be required that imposes a temporary time limit on the development. Subject to those conditions and the wholly minimal area of land where development is unlikely to be reversed it is considered there would not be any material loss of best and most versatile agricultural land. The development is therefore considered not to represent the irreversible loss of BMV land.
- 7.15 Officers note comments regarding the need for the land to be retained for food production. A number of references have been made to the Food Security report, an investigation by central government into food supply within the UK and identifying potential risks. That report is not planning policy and is therefore not a material planning consideration. Regard has been had to it insofar as it acts as evidence of current situation in the context of planning policy, but it is not considered to carry any weight in the determination.
- 7.16 Notwithstanding, no evidence has been provided that demonstrates the site must be retained for food production or that its temporary loss (even in the context of the proposed time period) would undermine the ability of the country as a whole to maintain stable food supplies. As the proposal would not result in the irreversible loss of agricultural land, which is predominantly not BMV land, it could therefore be reverted and used for crop production if necessary. It would be for wider government policy and legislation to direct such matters, but at this stage there is considered to be no policy basis to refuse planning permission on the grounds the development could undermine food supplies.
- 7.17 A number of comments from local residents and the CPRE have raised concerns that decommissioning is not likely to occur, and that the development will become permanent. Comments have recommended that a bond is secured to ensure there is capital needed for decommissioning. No comments received have referred to the potential use of conditions, or identified any reason that a condition would not be appropriate, having regard to material planning reasons.

- 7.18 Officers note many of these comments are based on assumptions of the applicant's finances. Planning permissions run with the land, not an individual, and there is no basis to restrict this development through a personal permission. In accordance with NPPF Para. 58 the financial viability of a development should be assumed acceptable where it accords with the provisions of the development plan. Viability is considered on a site-specific basis of the development and should not be predicated on the financial status of the applicant.
- 7.19 Policy LP35 notes that provision will be made for the removal of apparatus and the reinstatement of the site to an acceptable condition at the end of the permitted time period for the development. This is achievable by condition, which will be enforceable on any relevant landowner at the appropriate time, as permission runs with the land. It is standard practice to secure the decommissioning of such developments through condition, and officers consider there is no reason in this instance that would require an alternative arrangement.
- 7.20 Officers therefore consider there is no basis to require a bond or other such form of trust to secure the mitigation that could not be readily achieved through a condition, having regard to paras. 55 to 58 of the NPPF. Such a condition would deal with the physical works needed, as well as appropriate investigation into any potential impacts of the development in terms of ground, soil quality or water quality, to ensure they are reverted to at least current baselines.
- 7.21 On the whole, therefore, and subject to the conditions identified above, it is considered the principle of the development is acceptable, in terms of use and location, and in accordance with policies LP10 and LP35.

Character and Landscape

- 7.22 The Council's Landscape and Townscape Supplementary Planning Document 2022 (LTSPD) notes that this site sits within the Northern Wolds Landscape Character Area. In terms of nationally designation, the site also sits within National Character Area (NCA) 88 (Bedfordshire & Cambridgeshire Claylands) and NCA 89 (Northamptonshire Vales). The landscape is characterised predominantly through its strong visual topography, well vegetated valleys of an intimate scale, and open ridges and plateaus. It notes key issues within this area are the protection and enhancement of the distinctive ridge and valley landscapes, including the pattern of smaller fields in the valleys, the preservation of key views towards the distinctive skyline of ridge tops, church towers and woodland, the protection of existing watercourses and enhancement of their biodiversity value and the protection of ancient hedgerows and oaks within the valleys.
- 7.23 In respect to this application, the LTSPD particularly notes that all new development proposals should protect key views of the skyline of ridge tops and woodlands, improve the nature conservation value of streams and immediate valley sides and protect and enhance the distinctive characters of valleys and plateau landscapes through maintaining field patterns and long-distance views from the upland areas and protection of ancient hedgerows and oak trees within the valleys.
- 7.24 The application site sits within a valley, with the land rising to the eastern edge of the solar array and reaching a peak on the edge of the site and

continuing as a plateau to the east. The topography of the area, forming peaks and valleys across relatively short distance, is distinct within the region, where generally topography has limited variation across shorter distances.

- 7.25 The development proposes the solar panels away from the edge of the site, with vegetated landscape proposed along the edges in the form of high hedgerows, with interspersed clusters of trees along the boundaries, including stopping up existing gaps within existing hedgerows.
- 7.26 The application has been accompanied by Landscape and Visual Impact Assessment (LVIA) that has assessed the landscape as having a 'community' value in terms of the scale of importance attached to the landscape because of its special qualities or attributes in a national context. Officers consider this an appropriate classification in terms of the scale of locality in which this landscape is valued but note that this does not preclude further consideration of the actual value that might be placed on the landscape as a resource. The assessment considers the sensitivity of the landscape character on the whole to be low, having regard to the susceptibility to change and its value.
- 7.27 The LVIA has also been accompanied by viewpoints and assessment of the scale of change that would arise in the context of this development at various points. In general, it has concluded large scale effects would arise within the site and immediately adjacent to the southern parcel, but that effects beyond 300m of the northern parcel, and along Haddon Road and Bullock Road, would be small or negligible. It identifies that, in the short and long term, the effect of the proposal would be adverse, and at a moderate/slight impact in terms of magnitude on the landscape character, and moderate/minor impact in terms of the significance.
- 7.28 Objections have been received from Elton Parish Council and from a significant number of local residents on the basis of landscape harm. In particular, these consider that the planting proposals will not be able to screen the development to a satisfactory scale, particularly having regard to the topographical changes. They draw attention to the level difference across the site and note that the location of the solar panels on the highest points will result in their visibility in the surroundings from significant distance above the tops of any planting along the western boundaries.
- 7.29 An objection received from a neighbouring property, Bates Lodge, approximately 480m to the west, has been accompanied by a review of the applicant's LVIA, carried out by The Landscape Partnership Ltd (TLP), a qualified landscape consultant. This is a review of the applicant's submitted information and does not represent an LVIA in its own right. TLP have concluded in their view that the LVIA does not adequately assess the impact of the development and that the development cannot be made acceptable in landscape terms. They also conclude that the LVIA underestimates the value of the landscape, and in turn sensitivity of the receptor to change, which is considered too low.
- 7.30 The Landscape Officer has reviewed the application, the submitted Landscape and Visual Impact Assessment (LVIA) and its addendum, and the proposed planting plan. They note that the valley is relatively contained and consider the position of the panels on lower land, rather than the ridge considered at preapplication stage, will help contain and minimise the visual effects of the development.

- 7.31 While the Landscape Officer considers the sensitivity of the landscape within this area to be medium-low, as opposed to the low sensitivity identified within the LVIA, they have agreed in principle with the conclusions that the landscape has the capacity to accommodate the solar array at this scale without material harm in the context of the development. They raise no objections to the proposed development, and recommend a condition is imposed that requires a full planting scheme to be provided.
- 7.32 Officers have considered the details submitted from all parties in the context of the adopted LTSPD and the NCA designations. It is considered that the landscape does have the ability to accept the development, and that in terms of principle landscape matters its impact can be mitigated. The position within a valley is considered to substantially limit views of the site from beyond ridgelines at substantial distance.
- 7.33 Officers note the viewpoints submitted as part of the LVIA and the addendum, and which were subject to discussion with the Landscape Officer in terms of location. Local residents have expressed that these are not sufficient, and the submitted TLP report provides further points they consider should have been included. Officers note, however, that some viewpoints indicated from local residents are from private property, or in the case of the TLP report, are at a significant distance. Viewpoints that have been included in the applicant's LVIA are taken from positions that are considered sufficient to provide an understanding of the visual impact at these viewpoints suggested by third parties.
- 7.34 Officers note the comments in respect of the planting scheme, in that it does not screen the development. It is not considered that total screening of the development would be feasible, nor that it is a realistic or appropriate goal of a planting scheme for a development of this nature and scale. Such a planting scheme should aim to mitigate for the impacts of the solar farm by offering selective screening where the impacts are so harmful that it is warranted, but in general officers consider the aim of this planting proposal should be to introduce planting in a manner that otherwise breaks up continuous views of the development.
- 7.35 The use of high hedgerows would provide significant screening from views close to the site, where the highest magnitude of change is considered likely to be experienced. In longer views, the use of clustered tree planting, using the trees indicated within the submitted mixes, are considered likely to have a substantial impact in breaking up views of the solar panels and reflect the landscape character identified with the LTSPD. While it is considered unlikely planting would screen the development in its entirety, to achieve that level of screening would require a complete tree belt at significant scale that officers consider would be an alien feature in its own right. The proposed solar panels in the southern fields, which officers consider to be the area most visually apparent in the surroundings, are located away from the highest points. This will give the western boundary planting a greater opportunity to extend beyond the overall height of the solar panels, having regard to topographical changes, and while it is not considered likely to be able to achieve that across the entirety of all views, officers consider the most impacted views from the west will be afforded a sufficient level of mitigation, albeit that this level of mitigation will not provide immediate screening.

- 7.36 Overall, in terms of impacts on public views, officers consider those at the immediate edges of the site, and in close proximity are likely to experience a high level of change. Most of these would be from roads, and therefore views of the proposed development would be at speed and would only form a small part of the overall experience of the landscape. The boundary planting is considered sufficient to mitigate for views from non-motorised users. At longer distances, particularly along the southern fields where is considered views are more readily available due to the right of way network on the other side of the valley, officers consider that the distance of the view, coupled with the proposed planting scheme, will break up the views of solar panels sufficiently to limit their visual dominance in the landscape.
- 7.37 On the whole, and subject to conditions requiring a fully detailed planting scheme to be submitted, officers consider the proposal has demonstrated the proposed development would not result in a materially harmful impact to the landscape as a resource and has suitably integrated itself into the topography and character. The proposal would therefore accord with policies LP11 and LP12.

Highway and Transport Impacts

- 7.38 The application is located north and south of the A605, a busy, national speed limit road that adjoins the A1 to the east and provides connection to Peterborough. The application proposes access from this road, making use of existing farm access points either side of the road, for both construction and maintenance. It is noted that there have been a significant number of accidents on that road. Physically, the A605 is a wide, well-made highway, appropriate to the nature and level of traffic it carries.
- 7.39 The application has been accompanied by a draft construction traffic management plan (CTMP) that estimates approximately 496 construction deliveries across the build stage, with approximately 30 additional movements from contractors parking at the site on a daily basis. Once operational, the development is expected to require approximately 24 maintenance visits over the course of a year, one every two weeks. As the site would be monitored offsite, it is unlikely there would be any significant additional vehicle movements once the development is operational.
- 7.40 The Local Highway Authority have reviewed the submitted information and raised no objections in principle, subject to conditions relating to the construction and maintenance of accesses and appropriate control of construction traffic.
- 7.41 A substantial level of local objection has been received on the basis that the development would give rise to adverse highway impacts, particularly along the A605, and in relation to both construction and operational aspects of traffic generation. Comments have also objected to the use of any surrounding narrow roads and to the routing of construction traffic through villages. Recommendations have been made that interventions into the highway network would be required if the development was to be approved, predominantly to the junctions along the A605. Comments have also raised concern that electrical interference from the operation of the solar farm will result in adverse impacts to highway safety.

- 7.42 In respect of the vehicle movements generated during operation, it is considered the level of movement generated would not be materially noticeable in terms of transport capacity. While the A605 is a high-speed road there is plenty of visibility in both directions, which could be secured through condition, and which would provide adequate understanding of the traffic conditions for drivers to safely enter and exit the site.
- 7.43 The level of movement associated with the construction process is considered to be significant as a whole, given the level of delivery needed and the number of vehicle movements indicated, though it is noted this would be both limited in the length of time, and spread out through approximately 6 months, as indicated in the draft CTMP. It is proposed that access routes are predominantly from the A605, with a route also indicated along New Road and a short section of Haddon Road. Officers note that the removal of control building 2 is likely to mean the second access route is not needed, though in any event access along that route would be minimal, limited to small scale deliveries of equipment needed at the very end of the development in connection with the cable position at that location.
- 7.44 The majority of construction traffic would travel along the A605, where it is proposed to signalise the entrances and use a left turn in, left turn out access arrangement, controlled by banksmen, with vehicles turning at roundabouts where the A605 meets the A1 or Church St at Warmington to the east and west respectively. While it is likely this would cause some congestion, the controlled turning, together with conditions restricting delivery times to the site, would minimise that disruption. Given the relatively short period of construction time (indicated at potentially 6 months in the draft CTMP), this would further reduce the impact of the development. Subject to conditions limiting delivery times, this would also prevent any notable transport network capacity impacts, as it would not be anticipated that the level of vehicle movement needed would be particularly apparent on the road network surrounding the A1 and A605.
- 7.45 It is noted the CTMP is submitted in draft form. While, in principle, officers consider it is acceptable, given the changes in the proposal over time, and to ensure it is fit for purpose, a condition is recommended requiring that to be submitted in a finalised form.
- 7.46 Officers note the comments regarding electrical interference. No evidence has been submitted that indicates there is any potential such an impact could arise, and officers note there are solar farms, both in and out of the district, of varying scale which are close to roads, and there is no indication that these have given rise to any issues in highway safety terms through the creation of electromagnetic fields. Officers note there are no objections from the Local Highway Authority, and as such it is not considered there would be any material harm arising from potential electrical interference.
- 7.47 On the whole, and subject to conditions, the development is therefore considered not to represent an adverse impact to highway safety or the capacity of the transport network and would therefore accord with policies LP16 and LP17.

Public Rights of Way

- 7.48 The application site includes 2no. Public Rights of Way (PROW). The first (Bridleway 111/8) runs partially along the western edge of the northern most area of the site and terminates part way. The second (Bridleway 111/5) partially shares the route proposed to run the cable. A Permissive Path (ref CSS:05/352/0003) that sits next to, but just outside, the northern boundary of the site, runs east-west and connects the two PROWs. The application proposes to create a circular permissive path within the northern field, providing a loop to complete Bridleway 111/5 for the lifetime of the development.
- 7.49 The British Horse Society (BHS) and Hunts Ramblers have objected on the basis of harm to Rights of Way, though it is noted they have not commented on the latest set of amendments or to direct impacts that would either result in the stopping up or loss of Rights of Way. Their comments particularly relate to the potential that there are un-recorded or under-recorded PROWs on and surrounding the site, and the application should therefore accommodate these. A small number of comments received from local residents have also objected on the basis of a loss of Rights of Way.
- 7.50 The County Rights of Way Team have raised no objection to the proposal as amended, subject to a condition requiring precise details of the alignment and material, and conditions requiring offsets from PROWs for fencing and planting.
- 7.51 Officers note that only a single route of those suggested by BHS adjoins the right of way, which is a continuation of the Bridleway 111/8 to the crossing under the A605. Applications have been made to the County Council to amend the definitive map to include this, and those are under consideration. However, and in discussion with the County Rights of Way Team, there is no guarantee that these will be supported, and these routes carry no legal status. Officers therefore consider they cannot carry any weight in the determination of this application, and it would fall to separate legislation to control any obstructions in the event they were confirmed. Notwithstanding, officers also note that the single route that does fall within the site is not obstructed and follows the route of the permissive path proposed.
- 7.52 In terms of Bridleway 111/5, it is likely that there would be no functional impact to this PROW once the development is operational. There may be some temporary disruption during construction while the cable is laid, but this would be short term, with plenty of available land to enable a temporary rerouting, and no loss of connection as a result of the development, and subject to control by the County Council under separate legislation.
- 7.53 Similarly, Bridleway 111/8 would be maintained, with an enhancement as part of the circular route. While the detailed alignment and material of that right of way will be subject to further detail, the application has demonstrated there is sufficient space to accommodate this, and appropriate controls could be put in place through conditions. While there is likely to be a high visual impact to this PROW, its current arrangement, where it terminates in the field, is considered to limit its contribution to countryside access. The improvement from creating the circular route

would provide a greater level of useability and improve countryside access.

- 7.54 The permissive path is proposed on a temporary basis, to run concurrent with the operation of the solar farm itself. While it would have been preferential for the enhancement to become permanent officers consider this to be an acceptable arrangement as the improvement will remain in place for a proportionate time to the impact created by the development.
- 7.55 As no PROWs would be lost through the proposal, and the development would result in a temporary, albeit long-term, improvement to the PROW network, officers consider that, subject to conditions identified, the proposal would accord with policy LP16.

Impacts from Glint and Glare

- 7.56 This section considers the impacts of Glint and Glare on the highway network and airfields, in terms of safety. Impacts in respect of on amenity are assessed elsewhere in this report.
- 7.57 A number of objections have been received from local residents and Ward Members on the impacts of Glint and Glare, namely to highway and aviation safety. In particular, impacts are highlighted to users of the A605, Sibson Aerodrome and RAF Wittering.
- 7.58 The application has been accompanied by a Glint and Glare assessment, which considered 47 potentially sensitive views, including residential properties, roads, listed buildings, rights of way and a number of viewpoints within the LVIA. Of relevance to this section are the points along the A605 and along Bullock Road. That report has not assessed any points to the immediate south or west of the site, as the topography of the surrounding land is considered sufficient to prevent material impacts of glint and glare in those directions.
- 7.59 With regards to impacts to aviation safety, no comments have been received from either Sibson Aerodrome or RAF Wittering. Both airfields designate consultation zones, whereby specified developments in those areas require consultation. In this instance, the site falls within the consultation zone for RAF Wittering, but consultation is only required if a proposed development involves flying, or where the height of any structure or building exceeds 91.4m above ground level and neither of those instances are relevant to this application. Noting that this is the method these airfields use to determine impacts from development it is considered there is no basis to determine there would be a safety impact to the operation of these airfields, and no direct consultation is required to them, and no comments have been received.
- 7.60 With regards to Highway Safety, it is noted that there is a significant level of screening along the southern boundary of the northern site, and that screening would be provided and secured to other boundaries, limiting impacts of glare. The submitted report demonstrates that glint effects would be short term, predominantly around 5-10 minutes, with effects in the morning hours mostly around 6am, and therefore outside morning rush hour. In the evening hours, impacts are expected around 6pm, though to significantly fewer points than in the morning, and which are identified as being screened by existing vegetation.

- 7.61 Officers consider the distance from most points, together with the limited time where glint events can occur is sufficient to ensure there would be no material harm to safety. Where points are closer, predominantly along the A605, there is a substantial level of tree screening in place that would be retained, and that is considered sufficient to protect the points closest to the site.
- 7.62 On the whole the proposal is therefore considered to accord with policies LP15 and LP16 with regards to safety from glint and glare.

Ecology and Biodiversity

- 7.63 The application has been accompanied by Ecological Reports, a Landscape and Biodiversity Management Plan and detailed calculations of Biodiversity Net Gain. These set out the potential areas of ecological value within the site and its surroundings that may be of ecological significance and considers the potential mitigation and enhancement proposals to ensure the development does not result in adverse impacts to ecology and biodiversity.
- 7.64 The Wildlife Trust has reviewed these details and raised no objection. They have noted the reports follow best practice and consider these have established an accurate representation of baseline of the site. They note that the submitted Net Gain Calculations appear to be optimistic in respect of the proposed wildflower grassland, but that even if elements were considered to provide a low overall increase in biodiversity units the development would still deliver a significant increase in habitat units and therefore a high level of net gain.
- 7.65 A substantial number of comments from local residents and non-technical consultees have objected on the basis that the proposal will result in a loss of biodiversity, particularly to and within Billing Brook. The presence of Great Crested Newts has been noted, and comments have raised concerns that the proposal would not achieve a net gain in biodiversity.
- 7.66 The application site itself is arable land, which in itself is of limited biodiversity value, with any features of biodiversity value predominantly located at the edges of the site. There are established hedgerows and tree belts along its boundaries, with Billing Brook to the west of the northern part of the site notable as a habitat features. There is a number of statutory and non-statutory designations within 5km and 2km distances respectively. The majority of these are beyond the A1 to the east, with a small number of protected road verges to the west and southwest. None of these are within 1km of the main solar farm site itself, though a County Wildlife Site is located approximately 920m to the east of the end of the cable.
- 7.67 The submitted report provides a number of construction mitigation measures that would be capable of being secured by condition. This includes appropriate checks for the presence of any protected species, measures to limit the impact and access to active construction elements, and design measures to ensure connectivity remains through the site. Officers note that the mitigation measures also include some detail of habitat provision, including bat and bird boxes. The precise details of these have not been provided, however, in terms of location, but officers consider that detail is readily capable of being secured by condition, and

there are plenty of trees and other locations to be retained such that these are considered capable of being provided.

- 7.68 The application proposes the retention of all existing ecological features within the site. No pruning or other works to the established trees are required to carry out the development, and no works are indicated within any root protection areas. The submitted net gain calculations indicate a 215% increase in habitat units, predominantly through grassland planting, and a 91% increase in hedgerow units. Even noting the above comments of the Wildlife Trust in respect of the grassland planting, the level of net gain indicated is considered to be so significant as to be clearly capable of exceeding the minimum thresholds sought in LP30 and the 10% figure emerging in draft legislation.
- 7.69 Officers note the comments received from local residents regarding net gain but have not identified any comments that demonstrate why it would not be achievable, particularly having regard to the comments of the Wildlife Trust that clearly state a significant net gain will be achieved.
- 7.70 On the whole, therefore, and subject to conditions identified above, as well as a condition requiring a finalised landscape management plan and securing net gain, officers consider the proposal would protect existing ecological features and achieve measurable enhancement in biodiversity terms. It is therefore considered to accord with policies LP30 and LP31.

Drainage and Flood Risk

- 7.71 The application site is predominantly located within Flood Zone 1, at the lowest risk of flooding, with an area of the site along the western edge, close to Billing Brook, located within Flood Zones 2 and 3 at a higher risk of flooding. The application does not propose any physical structures within that area.
- 7.72 No objections have been received from the LLFA as the statutory consultee for surface water. They have recommended standard conditions seeking the fully detailed design should be submitted if the application is approved, details of its long terms management and details of how surface water will be managed during the construction process. Similarly, no objections have been received from the Environment Agency in respect of flood risk from river sources, subject to securing the mitigation in the submitted Flood Risk Assessment (FRA) that proposes no development within flood zones.
- 7.73 A number of objections have been received raising concerns on drainage grounds. In particular, these raise concerns regarding flooding around Billing Brook and the concern flood risk will be increased, and also note concerns the development will give rise to wider drainage issues.
- 7.74 The application proposes to manage surface flows predominantly through a mix permeable paving, swales and filter strips, with discharge into Billing Brook. This would both control the rate of discharge and provide water quality treatment. The LLFA have confirmed this would restrict rates of discharge to below greenfield levels. That level of restriction is considered sufficient to suitably ensure there is no change to flood risk arising from Billing Brook as a result of this development, as it would not experience any increase in the level or rate of surface water discharging into it.

- 7.75 While the solar panels themselves are not permeable, the development does not create substantial levels of hardstanding compared to, for example, a residential development. Water would reach the ground, and there would be some level of infiltration drainage naturally occurring, though as this is likely to be more focused into runs, the profile of how water runs along the ground is likely to change.
- 7.76 The proposed swales and filter strips would serve to slow water flow and create attenuation features that would hold the water while it discharges, and officers consider there is plenty of available land that can accommodate these features. The submitted FRA suggests that 685m of swales would be sufficient to meet the water storage need but proposes 1743m to ensure interception of all surface water. While the final length and position of swales will fall to detailed design stage, this significant increase above baseline is considered sufficient to be satisfied there is adequate space to accommodate the required drainage measures.
- 7.77 Officers note the relevant test in this instance would be that the situation is not materially worse than present. While the fully detailed design would be submitted at a later stage, the level of restriction indicated and the proposed mitigation measures that have been suitably demonstrated to be achievable are sufficient for officers to consider an acceptable drainage arrangement would be readily achievable.
- 7.78 In terms of flooding from river sources, a small section of the northern land parcel is located within Flood zones 2 and 3, with development located outside those areas. As a solar farm, the development is classified as "Essential Infrastructure" in accordance with Annex 3 of the NPPF and is therefore not subject to the sequential test. Such applications are still required to pass the exception test, in that proposals must demonstrate wider sustainability benefits to the community and demonstrate the proposal will be safe from flood risk and result in no increase in flood risk elsewhere.
- 7.79 Notwithstanding that no development is proposed within the areas of higher flood risk, in terms of sustainability benefits, those are considered to be readily apparent in the context of this solar array, as part of the reduction on non-renewable sources of energy, coupled with the net gain proposals that will support local biodiversity. It is noted that some comments have been received highlighting that generated energy will not be used locally, the application has not been proposed, or considered on the basis of supporting local need, but officers consider that the position of the solar farm, and its connection points into the grid, is likely to mean that there will be some reasonable level of energy use within the locality, increasing energy security for local residents as well as regionally/nationally.
- 7.80 Officers also consider the second part of the exception test, in that there is no increase in flood risk, has also been passed. As the development is located outside the flood zones there is no impact to the existing functional flood plain through a reduction in that area, and the development has demonstrated it can adequately accommodate the storage and release of surface water into the brook to less than greenfield rates such that there would be no material impact beyond current runoff rates.

- 7.81 Subject to conditions, therefore, officers consider the proposal would not give rise to any adverse impacts to drainage through surface water or river sources. The proposal would therefore accord with policies LP5 and LP15.

Heritage Impacts

- 7.82 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require that special regard is had to the desirability of preserving particular features of Listed Buildings and Conservation Areas respectively, and great weight should be afforded to the conservation of such heritage assets. The Ancient Monuments and Archaeological Areas Act 1979 protects the archaeological heritage of Great Britain by making provision for the investigation, preservation and recording of matters of archaeological or historical interest. There are a number of heritage assets within the wider locality, set out in para. 1.6 earlier in this report.
- 7.83 HDC's Conservation Officer has reviewed the application and has raised no objections on the grounds of harm to heritage assets, due to the separation from designated heritage assets such that the proposal is not considered to be within the setting that contributes to their significance.
- 7.84 The County Historic Environment Team (CHET) have also raised no objections and consider that the development would not impact any archaeological deposits.
- 7.85 A small number of comments received from local residents have objected, inter alia, on the basis of harm to the setting of heritage assets within the area, though officers note no specific heritage asset has been identified.
- 7.86 In accordance with policy LP34, para. 199 of the NPPF, and the relevant legislation, great weight should be afforded the protection of heritage assets. Any harm should be considered in accordance with paras. 200 to 202 of the NPPF, and a development that gives rise to harm will need to be balanced against any public benefits of the proposal.
- 7.87 Generally, the topography of the area screens heritage assets to the west and south of the site, and they are sited either on top of the ridge, in the case of the Roman Barrow, or the other side, where the land starts to fall away, as is the case for St Marys Church. Other directions are similarly screened, though there may be some longer views as the ridgelines are more distant. There is existing intervening screening within some of these views, and additional screening would be secured as part of the development along the boundaries of the site to further create intervening barriers. Those aspects are considered likely to mean the site is not within the setting of these heritage assets.
- 7.88 While the site of the cable is visible from designated heritage assets in the area, as this is underground it is not considered there is any impact to the significance of these assets through development in their setting.
- 7.89 While the comments of local residents are noted, the Conservation Officer and CHET have raised no objections, and do not consider the proposal would result in any material harm. Officers consider that greater weight should be afforded to these consultees given their expertise, and as limited detail has been provided from any third party on what harm arises

in relation to heritage assets. Having regard to the topography of the land, and the existing and proposed screening, officers consider that even if the development was considered to be within the setting of surrounding heritage assets the development would not result in any harm to their significance.

- 7.90 The proposed development is therefore considered to accord with policy LP34 and the relevant provisions of the NPPF in respect to impact to heritage assets.

Impacts to Neighbouring Amenity

- 7.91 While the site is distant from the majority of residential dwellings in the area, officers note a small number are in close proximity, with the closest being approximately 480m to the west of the solar array, not including the location of the cable. That distance is considered sufficient to protect the amenity of surrounding occupants from overshadowing or overbearing impacts, notwithstanding that the solar panels and associated structures are not of such a height that they would be considered likely to give rise to harmful levels of overbearing or overshadowing.
- 7.92 A number of comments have been made raising concerns on the impacts of CCTV to monitor the site, and the potential views it will afford, particularly over third-party land to the detriment of residential amenity. Officers note the distance of the site from neighbouring property and do not consider there is likely to be any realistic views that would be able to identify any residents. However, the precise positions, orientations or fields of view of CCTV cameras are not yet available, and officers therefore consider it is appropriate to require those details by condition, including with details of the approximate fields of view that they would afford, to ensure views are focused within the site itself and would minimise any distant views over neighbouring property that might give rise to the perception of, if not actual, overlooking.
- 7.93 Officers note a number of comments from local residents have raised concerns regarding lighting within the site, on the basis that floodlighting will have significant impacts, and referencing the comments of the Cambridgeshire Police. It is noted the Police comments do not express any view that lighting is required to be permanently illuminated, and do not express any particular view on the extent or intensity of lighting, they solely request lighting details when they are available.
- 7.94 As lighting, particularly of large areas, can result in impacts at a substantial distance, officers consider there is some potential for impact to amenity of surrounding property through uncontrolled and unrestricted lighting. This is likely to be mitigated at a distance, but the precise impact will be dependent on the level of illumination.
- 7.95 Officers consider that there is every possibility a satisfactory lighting arrangement can be accommodated within the site. Appropriate lighting hoods or other form of directional lighting would limit light spill, particularly when coupled with sensors or timed lighting to ensure there is no need for permanent lighting across the site unless there are overarching reasons. Officers consider this can be conditioned and subject to that condition are satisfied this would limit any impacts of lighting on neighbour amenity or the surrounding area.

- 7.96 In terms of noise, the operation of the solar farm is unlikely to result in any materially noticeable change in the current level of background noise, though in any event the distance from residential properties is considered sufficient to considered sufficient to mitigate any impacts that might arise.
- 7.97 Officers note comments have been received from local residents that the proposal will be visible from their property, including on the basis that the level of change will be so great that it will result in harm to amenity. That a development may be seen from or alter views from a private property is not material. The consideration in this respect is whether the magnitude of change is so great that it would materially impact the ability of any residential occupier to enjoy the property. Officers note the closest property, at 480m to west of southern field, is a substantial distance, and sits at a topographical level similar to the lower points of the application site. This is a significant distance, and as noted above planting would further reduce the impacts of the solar array through breaking up the visual impact of the array. Officers therefore do not consider that there would be such a visual impact to private views that the development would result in a material level of harm to the amenity of the property.
- 7.98 The construction period is likely to give rise to higher levels of noise, though across a relatively short period of time. The Environmental Health Officer has raised no objections on the basis of noise and consider that a Construction Environmental Management Plan (CEMP) can be conditioned to ensure adequate provision is made to further limit noise and other impacts during construction. The site does not immediately adjoin neighbouring property, and the nature of the development is such that there is likely to be more limited impacts in construction than might arise from, for example, more substantial or permanent built form. Noting the short timescale of the development, the position of the site and the physical nature of the works that would be required for the development, officers consider that suitable management proposals can be achieved within the site, secured by condition, that would not result in any material harm to the amenity of surrounding occupants through noise or other impacts arising from the construction period.
- 7.99 On the whole, and subject to the conditions identified, officers consider the proposal would accord with policy LP14.

Contamination Risks and Pollution

- 7.100 The Council's Environmental Health Officer has raised no objection on the basis of contamination risks or air pollution. Natural England have raised no concerns subject to conditions to ensure that there would be no ground contamination, and the LLFA have noted the proposed mitigation measures would also provide filtering before surface water is discharged into Billing Brook.
- 7.101 A number of local residents have raised concerns with regards to contamination of Billing Brook through runoff, and a small number have also raised concerns in respect of air quality through emissions arising from ground disturbance and construction.
- 7.102 In terms of existing contamination, officers consider it likely that the active agricultural use of the site would have required some form of chemical use that could result in contamination, though it is not considered highly likely there would be any contaminants within the site. There are no

notable brownfield uses within or surrounding the site that would give rise to concerns in terms of contamination, or any significant evidence of past uses that would indicate previous contaminative uses on or adjoining the site, notwithstanding the cable runs close to existing buildings. While the A605 and A1 are in relatively close proximity to the site, and are both likely to be sources of emissions, there are no designations covering these areas that indicate they are at or approaching levels of excessive particulate matter in the air that may be considered harmful to human health.

- 7.103 As a solar farm, the developments operational aspect would not give rise to emissions that would result in materially adverse impacts to air quality. While there would be some level of emissions during construction, the short length of the construction time is such that it is considered these would be marginal, and not at a level that would be considered harmful.
- 7.104 A number of objections have been received raising concerns that chemicals used in cleaning the panels will result in ground and water contamination. It is noted that no statutory or technical consultees have objected on this basis or raised concerns. The LLFA has noted the proposed surface water drainage measures will have a filtering effect to ensure discharge into Billing Brook does not adversely affect water quality, and the Environment Agency have raised no concerns regarding potential discharge of contaminations.
- 7.105 While officers consider there is likely to be some chemical use as part of regular maintenance of the site, both in cleaning solar panels as needed and as part of biodiversity management to limit the possible impact of inappropriate plant species, the level of use is considered likely to be low, having regard to the amount of maintenance visits likely to be carried out throughout the lifetime of the development. It is noted that any consideration should be made against a likely starting point that some chemical use would form part of standard agricultural practice use of the site, albeit in a materially different context.
- 7.106 Overall, and particularly having regard to the mitigation that will form part of the drainage scheme, officers consider the proposed development is unlikely to lead to any materially harmful impact to water sources within and surrounding the site.
- 7.107 In respect to ground contamination, it is noted that no concerns have been raised by the Environmental Health Officer. The application has set out the aspects of the development that could potentially give rise to ground contamination, namely oil storage. This is covered by other legislation, both in respect to maintaining the appropriate form of storage as well as in the event of a spill.
- 7.108 There are no other sources likely to result in ground contamination particularly arising as a result of the development. As any water would be discharged into the nearby Brook, and as noted above is considered sufficiently remediated through the drainage proposals, it is considered this is sufficient to limit the impact of any possible chemical use.
- 7.109 On the whole, the proposal is considered to accord with policies LP36 and LP37 in respect to ground and water pollution and air quality.

Other Matters

- 7.110 The application has been accompanied by a Rapid Health Impact Assessment. While this is limited in its overall scope due to the nature of the proposal, the matters of air quality, noise and neighbourhood amenity, access to work and training, and climate change, are considered relevant matters to be addressed. The submitted document generally notes that no mitigation measures are required where it has identified relevant matters to this development as the proposal is likely to lead to a neutral or positive impact. Where there are potential impacts, the report identifies that other elements of the proposal will already include provisions that act as mitigation, such as construction management plans. Officers have reviewed the report, and particularly those items identified as requiring mitigation or enhancement and consider these are adequately covered by conditions already identified within this report. As such, it is considered the proposal accords with policy LP29.
- 7.111 Officers note a small number of comments received have referenced National Policy Statements (NPS), specifically EN-1, the Overarching NPS for Energy. As set out in para. 3.6 above, the weight to be attributed to NPSs is a matter for the decision maker, in accordance with the provisions of those documents. The starting point for decision making remains the adopted Local Plan, which is considered up-to-date and has been assessed as in accordance with the NPPF. Officers have had regard to the NPSs where relevant to this proposal but given the primary reason for their production as part of the NSIP regime, consider they should be approached as supporting guidance, and that accordance with the policies of the adopted local plan is the appropriate test in assessing the acceptability of this proposal. The local plan has been subject to examination and found sound, and its policies are specific to the district.
- 7.112 A number of comments received have objected on the basis that there is no assessment of alternative sites provided that demonstrates the development must be in this location. This is not a requirement of adopted policy, and regardless of any identification of alternative sites the application site as submitted must still be assessed on its own merits. Assessments of alternative sites would normally be required only where there were harms identified in order to demonstrate there were no other alternatives such that the location should outweigh those harms. In this instance no significant harm has been identified, there is no adopted policy requirement, and no other reason has been put forward as to why an assessment of alternative sites should be carried out. It is therefore not considered a necessary or reasonable requirement to seek further assessment of alternative sites in this instance.
- 7.113 A number of comments received have stated that a Carbon Lifecycle Analysis of the scheme is required, and have raised concerns the proposed development, across its inception to decommissioning stage, would result in an overall increase in carbon emissions than will not be offset through the operation of the site. Officers note no policy requirements for such a review. It is considered to be highly unlikely the operation of the site, over the course of the 40-year timescale, would not significantly outweigh the initial impacts and decommissioning of the development and no evidence has been put forward that indicates the alternative has any reasonable likelihood of being the case. The national support for solar development forming part of the solution to energy

security is also noted, with the carbon life-cycle likely to be similar for all developments of this nature.

- 7.114 Comments have raised concerns that the proposal would lead to an increase in risk of crime. The Cambridgeshire Police have noted that solar farm installations themselves can be vulnerable to crime but have not made any comment that there is likely to be an increase in crime beyond the site itself. As set out above, lighting and CCTV would be required as part of the development, and details of that will be secured by condition. The site would also require fencing, and the final details of that would be required by condition to ensure it meets appropriate safety standards without adversely impacting character or undermining ecological corridors. This accords with the comments of the Police and officers consider this is sufficient to limit the threat of any crime that might arise, sufficient to ensure there would be no materially increased risk either to the site or its surroundings. The proposal is therefore considered to accord with policy LP14 in terms of risk of crime.
- 7.115 A condition is recommended removing permitted development rights for fencing across the site. Officers note this is recommended by the County Council as both Local Highway Authority and Definitive Maps Team in order to safeguard highway safety and the impact of the development on rights of way. Officers consider this is also necessary to ensure the fencing approved under the condition suggested above is not replaced with a more inappropriate form that would have a greater impact and would therefore afford control in respect of landscape matters. Such a condition is considered necessary to ensure the development would accord with policies LP12 and LP17.
- 7.116 The application has indicated funds are available towards a local project, that could be secured through a S106 agreement. Officers note no requests for contributions have arisen, and none are warranted in accordance with the adopted Developer Contributions Supplementary Planning Document. In accordance with the CIL Regulations, contributions can only be sought where it is relevant to planning and the proposed development, and where necessary to make that development acceptable in planning terms. In the absence of any basis to require contributions, officers do not consider any contribution on this basis would fail the tests within the CIL regulations and should not be sought as part of this development or carry any weight in the determination of this application. Notwithstanding this planning policy position, conversations around any local community project could continue directly between parties outside of the planning process, should the local community wish to do so.
- 7.117 Officers note comments received that state there will be a harm to human health caused by the presence of the solar farm due to potential electromagnetic fields. No basis for these concerns has been identified, or any evidence that indicates there is any risk. No objections have been raised from statutory consultees that relate to health, or any evidence provided that this is a potential impact of solar farms. Officers therefore consider there is no reasonable basis to consider there would be a harm to human health through the presence of the solar farm.
- 7.118 Notwithstanding comments regarding the applicant's financial status, noted above, comments have also raised concerns that the proposal is not viable in any event. Para. 58 of the NPPF notes that applications

should be assumed to be viable, and it is for the applicant to demonstrate if there are any particular circumstances that justify the need for a viability assessment. There are no financial contributions sought from this site, and no features or constraints of the development that would indicate any abnormal costs beyond standard requirements. Officers have no reason to conclude the development is not financially viable.

8. Planning Balance and Conclusions

- 8.1 The application must be considered in accordance with the statutory tests in s.38 (6) of the Planning and Compulsory Purchase Act 2004, namely, in accordance with the Development Plan unless material considerations indicate otherwise. As the adopted Local Plan came into force in May 2019 it is considered to be 'recently adopted' in accordance with footnote 38 of the NPPF. The policies which are the most important for determining the application are considered to be up-to-date and are afforded full weight.
- 8.2 Officers have reviewed the detail submitted, along with representations from local residents, and technical and non-technical consultee responses. It has been identified that the proposed development would accord with national and local policy, having regard to the controls that are available to the Local Planning Authority, particularly conditions as set out in the recommendation below. While it is noted that there will be some immediate impacts, particularly in relation to landscape and highways, these are not considered to be materially harmful in the context of the development as a whole, having regard to the timescales of such impacts throughout the lifetime of the development. In any event these limited impacts are considered to be significantly outweighed by the material benefits of renewable energy generation and biodiversity net gain that would arise from the development.
- 8.3 On balance and subject to appropriate conditions, it is considered the proposal accords with adopted national and local policy, and no material considerations have been identified that would indicate the application should otherwise be refused contrary to that policy.

9. RECOMMENDATION – delegated APPROVAL subject to conditions including in relation to the following;

1. 3-year time limit to implement
2. Accordance with approved plans
3. 40-year temporary permission
4. Decommissioning plan to be submitted.
5. Agricultural land and soil management plan to be submitted.
6. Detail drainage scheme to be submitted.
7. No development to be located in Flood Zones.
8. Long-term management and maintenance details of drainage scheme to be submitted.
9. Management scheme for surface water discharge during construction to be submitted.
10. Full details of hard and soft landscaping to be submitted.
11. Landscape and Ecology Management Plan to be submitted.
12. Ecological enhancement details to be submitted.
13. Details of CCTV locations and fields of view to be submitted.

14. Details of lighting to be submitted.
15. Long term landscape management plans to be submitted.
16. Biodiversity net gain to be provided.
17. Public Rights of Way / Permissive Path details to be submitted.
18. Construction Environmental Management Plan to be submitted.
19. Construction Traffic Management Plan to be submitted (and include construction delivery times).
20. Details of fencing to be submitted.
21. PD Rights for fencing to be removed.
22. Any gates hereby approved to be 17m from the edge of the carriageway and only opened inward.
23. Access to be a minimum of 7.3m in for 17m in depth.
24. Access to be constructed to CCC Specification where they adjoin the adopted highway.
25. Details of the vehicle crossing over the watercourse to the north of the site to be submitted.
26. Parking and manoeuvring space to be provided within the site and thereafter retained.
27. Visibility splays to be provided and maintained.
28. Access kerbs to be 15m radius
29. No surface water to discharge onto the highway from the accesses.
30. Access to be a metalled surface.

If you would like a translation of this document, a large text version or an audio version, please contact us on 01480 388388 and we will try to accommodate your needs.

CONTACT OFFICER:

Enquiries about this report to **Aaron Sands, Senior Development Management Officer**

ELTON PARISH COUNCIL

Development Services, Huntingdonshire District Council
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN

16 October 2023

Planning Ref.: 22/00668/FUL

Dear Development Services, Huntingdonshire District Council,

Further to your recent correspondence dated 4th October 2023, Planning Ref: 22/00668/FUL, requesting comments within only 14 days relating to yet another amendment being allowed for the *“Installation of a solar park to export up to 25 MW (AC) electricity, comprising up to 65,000 photovoltaic panels, 10 inverter/transformer cabins associated works. Land North East Of Bates Lodge Peterborough Road Haddon”*.

Elton Parish Council continues to object to Planning Ref: 22/00668/FUL for the construction of a large solar park in the neighbouring parish of Haddon, both north and south of the A605 road, on hillsides in the Northern Wolds area of rural Huntingdonshire.

This latest amendment submitted by Wessex Solar Energy Limited on the 2nd October 2023, being the revised “Landscape Masterplan”, drawing LL149.01 F, prepared on the 25th September 2023 has been reviewed and duly considered.

- The minor and insubstantial amendment being some enhancement of landscaping screening with hedges planned to be maintained at a height of 3 – 4 m.

This latest amendment has absolutely no bearing on the fundamental objections to the solar park proposed for this particular location.

In addition to the objections stated below, Elton Parish Council confirms the objections stated previously on 20 July 2023, and 18 November 2022, reiterating objections stated on 3 August 2022 and in February 2022.

As stated in our objection of 20 July 2023, it is inappropriate to locate a large solar park on the side of, and near the crest of, a hill in open countryside where it will have the maximum visual impact on the surrounding area and will be impossible to provide adequate screening to mitigate the impact.

- This latest amendment to the Landscape Masterplan is yet another desperate attempt by Wessex Solar Energy Limited to try to persuade authorities and local residents that the visual impact of the development can be managed. It has taken Wessex Solar Energy 19 months from submitting drawing LL149.01 C, prepared on the 28th February 2022 until now to propose the latest amendment to the Landscape Masterplan. The repeated failed attempts by Wessex Solar Energy to propose satisfactory mitigation of the visual impact of this project proves what residents keep stating – it is impossible to mitigate the visual impact from inappropriate siting of a solar farm (or any other massive development) on a hillside and near the crest of a hill in the Northern Wolds. The solar farm should simply not be planned for this (or any similar) location.

Wessex Solar Energy now proposes hedgerows maintained at a height of 3 – 4 m.

Note that it would take about ten years or more for any newly planted hedge to reach a height of 3 – 4 m.

A review of the topography map of this proposed development, Figure 1.2D drawn by Wessex Solar Energy on 18 December 2022 clearly shows:

- In the fields north of the A605 road, the terrain slopes from approximately 20 m amsl at the western boundary hedge up to 42.86 m amsl near the crest of the hill at the eastern boundary hedge, an increase in elevation greater than 22 m; so, a 3 – 4 m hedgerow along the western and northern boundaries will be totally ineffective for visual screening at any distance other than walking along right next to the hedge.
- In the fields south of the A605 road, the terrain slopes from a low of 20.4 m amsl at the western boundary hedge up to 44.3 m amsl near the crest of the hill at the eastern boundary hedge, an increase in elevation of 23.9 m; so, a 3.5 m hedgerow as proposed along the western boundary will be totally ineffective for visual screening at any distance other than walking along right next to the hedge.



There has clearly been no serious attempt to consider alternative, more appropriate, locations for such a large solar park with level, lower-lying topography on 'brownfield' land or adjacent to the main railway line east of the A1/A1(M) highway.

The Huntingdonshire Landscape and Townscape Assessment states "*the Northern Wolds are an attractive and relatively unspoilt part of the district*". The proposal for this large solar park on the slopes of the Northern Wolds is clearly an "*unsympathetic development*" which will alter the "*intrinsic character and beauty of the countryside*" and the visual impact will "*adversely affect the use and enjoyment of the countryside by others*" all contrary to Local Plan Policy LP10 "The Countryside".

As a point of order, how many more amendments is Wessex Solar Energy Limited allowed to submit before this application is refused? Every amendment requires much time and effort, and cost, from Huntingdonshire District Council and all the consultees.

For the reasons stated above and other reasons stated previously, Planning Application 22/00668/FUL for a solar farm at this location should be rejected.

Should you have any queries or require any further information relating to this matter, please do not hesitate to contact me at your convenience.

Yours sincerely,

Parish Clerk, Elton Parish Council

To HDC Development Control

As requested, I am pleased to submit the observations of Chesterton Parish Meeting ('CPM') in respect of Planning Application 22/00668/FUL relating to the proposed installation of a solar park on 107ac of land [in the parish of Haddon] south-east of Bates Lodge.

Historical background: on the break-up of the Marquess of Huntly's estate in Huntingdonshire in 1916, virtually the whole of the parish of Haddon was acquired by one local farmer. Indeed, Kelly's *Directory of Huntingdonshire* for 1920 records that "George Martin esq is the principal landowner" (a landholding which amounted to over 1,200ac). The same family is believed to be still in possession. Since then little of significance has occurred in the immediate area, except for the relocation of the A605, and so the greater part of the parish of Haddon remains purely agricultural. We cannot ignore, however, the ever looming presence of a heavily commercialised Peterborough just over the boundary line set by the existence of the A1.

This Application: as we understand it includes the following infrastructure:

- the installation of up to 65,000 photovoltaic solar panels
- the erection of 10 inverter/transformer cabins
- the conversion of (or installation within the curtilage of) Toon's Lodge into a 'control' building
- security fencing around all enclosures, compounds and associated 'routes'

Comments in favour:

- supports and promotes the 'Green energy' manifesto

Contra (and other) comments:

- we feel strongly that HDC should uphold the integrity and validity of its current *Local Plan*, which clearly recognises the value of the north-west Huntingdonshire landscape by maintaining its designation as 'countryside', whilst focusing development potential to the periphery of existing towns in District. The proposed development seeks to ignore this delineation and fundamentally changes the very nature of this area.
- 'Landscape value' may be difficult to assess quantitatively, but clearly exists, and should not be readily dismissed. The proposed site is situated across the undulating 'clay vale' landscape common to both Bedfordshire and western Huntingdonshire, it lies close to the edge of the Northern Wolds "*which are an attractive and relatively unspoilt area of countryside with a strong historical character.*"
- *Huntingdonshire Design Guide SPD* (2017) further champions the landscape by reflecting on the mitigation elements of potential developments, suggesting that any new designs for building in this sensitive landscape should not be positioned so as to effectively overwhelm the landscape, but should eschew high-points in favour of valley bottoms, and avoid intruding on landscape 'view corridors'. This, it is anticipated, will protect and enhance the distinctive characters of the valley and plateaux landscapes,

maintain long views from the upland areas, and preserve distinctive skylines of ridge tops, church towers and woodland.

Specifically:

- what is the possibility of light reflection (or pollution) affecting traffic on the A605 ?
- likewise for aircraft on flight-paths for Sibson Airfield (or RAF Wittering) ?
- the modest size of the proposal site is misleading, as it could be easily extended over the whole parish considering that the landowner has a perceived desire to withdraw from farming
- it is a remarkably incompact site (it could all, for example, be easily located south of the A605, and not have a straggling link to Toon's Lodge); we wonder if this lack of compactness is to provide, at the outset, a precedent for subsequently developing and extending the site on both sides of the A605 ?
- as a 'rider' to the last item, we are concerned that if, by erecting this otherwise 'temporary' and insubstantial infrastructure, the status of the land will be changed forever to something which will invite (and allow) easier development opportunities in the parish.
- the Application seems uncertain as to whether 65,000 solar panels is a *maximum* number or an *approximate* number (surely less confusion and more certainty is required; the art of counting is, after all, a basic educational attainment)
- likewise with the Inverter/Transformer Cabins (10 of each = 20 in total; or just 10 if they have a shared purpose ?); why do they not neatly service 6,500 solar panels each ?
- we were concerned by the apparent lack of clarity over the relationship between the 'Control building' and Toon's Lodge (after John Toon, 1805-1869, the tenant farmer). Better, perhaps, to site the Control Apparatus within one of the main enclosures, which would obviate the need for the absurd zig-zag track (and security fence), and not compromise the integrity of any original buildings existing at Toon's Lodge.
- presumably a time limit will be set on the life of the 'Contractors Compound' ?

Conclusion: we note that the northernmost field of the proposal site abuts the common boundary between the parishes of Haddon and Chesterton. Although the whole proposal site lies within the parish of Haddon, yet there will clearly be an impact on Chesterton (if not now, then almost certainly within 10 or 20 years). So this Application has been seriously considered by members of our Standing Committee resulting in the foregoing observations. However CPM is not inclined to recommend either approval or refusal, but respectfully concludes that HDC has more expertise to be able to judge the merits (or otherwise) of this Application.

Yours sincerely

██████████

Clerk, Chesterton Parish Meeting

[REDACTED]

From: [REDACTED]
Sent: 18 August 2022 16:57
To: Control, Development (Planning)
Cc: Alwalton Parish-Council; [REDACTED]
Subject: Alwalton Parish Council response to proposed Haddon Solar Park22/00668/FUL

Dear All,

Following extensive consultation with local residents, Alwalton Parish Council wish to recommend refusal of this planning application.

1. The application is not in accordance with the recently adopted Local Plan. Communities have a reasonable expectation that a statutory local plan process, carried out by the democratically elected Huntingdonshire District Council and scrutinised by the governments Secretary of State would provide a strong basis for future planning decisions.
2. The appearance will be hugely detrimental throughout the local area. Namely:
 - a. Destruction of the landscape, not only of the immediate vicinity but of the wider part of the district, since it will be very visible from viewpoints for many miles around. It is worth noting that the greater part of this landscape was set out as part of the 18th c enclosure of the parish and most of the hedgerows and oak trees planted at the time, still remain.
 - b. Massively reduce the ecological bio-diversity of this area. As noted, the proposed site contains mature hedgerows and a significant number of mature native trees. It also contains Billing Brook and its valley and associated streamside habitats...a very significant local wildlife corridor.
 - c. Disastrously affect the wildlife and the flora and fauna of the area.
 - d. Destroy the ability of good quality agricultural land to produce food for the foreseeable future. Solar panels could be sited on brownfield sites such as old aerodromes, old industrial sites or the roofs of modern large scale buildings such as the mega warehouse sheds of Greater Haddon on the east side of the A1.
3. Currently the A1 motorway/dual carriageway forms a boundary between the industrial development of Peterborough and the adjacent rural countryside and this boundary should remain.

Kind regards

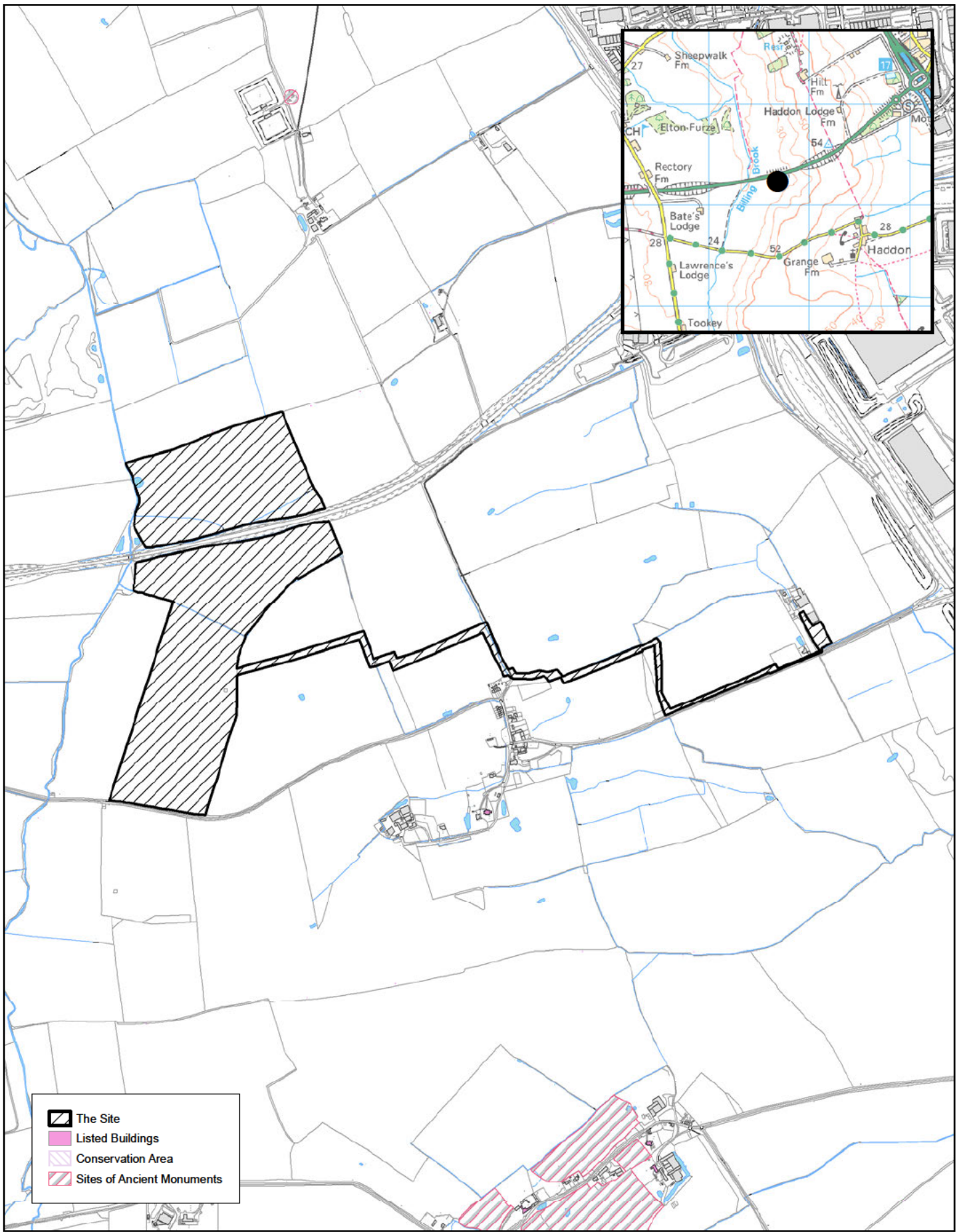
[REDACTED]
Chair, Alwalton Parish Council

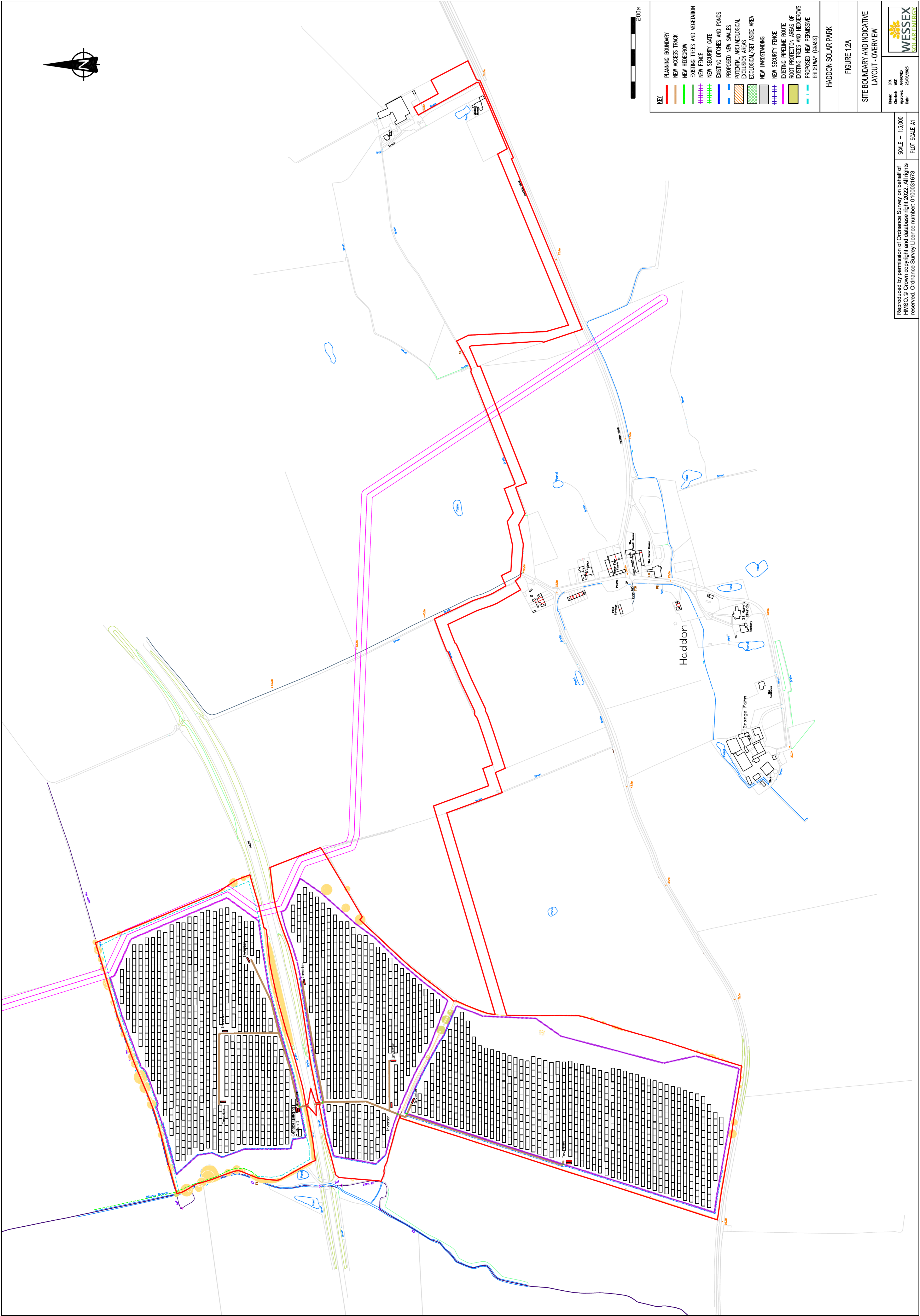
Development Management Committee

Scale = 1:15,000
Date Created: 04/12/2023

Application Ref: 22/00668/FUL
Parish: Haddon

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Ordnance Survey HDC 100022322





200m

- | KEY | DESCRIPTION |
|--------------------|--|
| [Red line] | PLANNING BOUNDARY |
| [Green line] | NEW ACCESS TRACK |
| [Blue line] | NEW HEDGE ROW |
| [Purple line] | EXISTING TREES AND VEGETATION |
| [Yellow line] | NEW FENCE |
| [Blue dashed line] | NEW SECURITY GATE |
| [Blue dashed line] | EXISTING DITCHES AND PONDS |
| [Blue dashed line] | PROPOSED NEW SWALES |
| [Blue dashed line] | POTENTIAL ARCHAEOLOGICAL EXCLUSION AREAS |
| [Blue dashed line] | ECOLOGICAL/SET ASIDE AREA |
| [Blue dashed line] | NEW HEDGES |
| [Blue dashed line] | NEW SECURITY FENCE |
| [Blue dashed line] | EXISTING PIPELINE ROUTE |
| [Blue dashed line] | ROOT PROTECTION AREAS OF EXISTING TREES AND HEDGES |
| [Blue dashed line] | PROPOSED NEW PERMISSIVE BRIDELWAY (GRASS) |

HADDON SOLAR PARK

FIGURE 1.2A

SITE BOUNDARY AND INDICATIVE LAYOUT - OVERVIEW



Drawn: [Name] Approved: [Name] Date: 23/09/2023
SCALE - 1:3,000
PLOT SCALE A1

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EXISTING BRIDLEWAY ROUTE TO BE IMPROVED WITH A NEW ACCESS GATE AT POINT 1 AND SUITABLE SURFACING THROUGH THE WOODLAND

NEW PERMISSIVE BRIDLEWAY ROUTE TO BE MAINTAINED AT A MINIMUM 4M WIDTH BETWEEN BOUNDARY VEGETATION AND THE PROPOSED DEER FENCING



KEY

-  PLANNING BOUNDARY
-  NEW ACCESS TRACK
-  NEW HEDGE/ROW
-  EXISTING TREES AND VEGETATION
-  NEW FENCE
-  NEW SECURITY GATE
-  EXISTING DITCHES AND PONDS
-  PROPOSED NEW SWALES
-  POTENTIAL ARCHAEOLOGICAL EXCLUSION AREAS
-  NEW HARDSTANDING
-  NEW SECURITY FENCE
-  EXISTING PIPELINE ROUTE AND BUFFER
-  ROOT PROTECTION AREAS OF EXISTING TREES AND HEDGEROWS
-  EXISTING BRIDLEWAY
-  PROPOSED NEW PERMISSIVE BRIDLEWAY (GRASS)

HADDON SOLAR PARK

FIGURE 1.2B

SITE BOUNDARY AND INDICATIVE LAYOUT - MAIN SITE

Drawn: CPA
Checked: WSE
Approved: APPROVED
Rev B : 23/06/2023



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SCALE - 1:4,000
PLOT SCALE A3

Please read with Sheet 2 and the Landscape Design and Aftercare section of the Environmental Report.

E 512500



Billing Brook

Existing Gas Pipeline with standoff.

Northern Site Boundary hedgerow enhanced by gapping up with Hedge Mix 2 and new damp tolerant native tree species such as *Alnus glutinosa* with *Quercus robur* where drier.

Hedgerow to be maintained at a height of 4m

New pedestrian gate installed on footpath / field boundary.

New Field Corner clumps of native tree species with scrub.
Existing hedges enhanced by gapping up with Hedge Mix 1.

Hedgerow to be maintained at a height of 4m

Enhance young highway planting to both north and south of A605 by gapping up existing hedgerows with Hedge Mix 3. Manage at a taller height, say 3-3.5m.
Plant native trees in gaps, outside the gas main standoff, especially oak with field maple and alder in the damper

Hedgerow to be maintained at a height of 4m

New Field Corner clumps of native tree species with scrub.
Existing hedges enhanced by gapping up with Hedge Mix 1.

A 605

Hedgerow to be maintained at a height of 5m

5.5m planting buffer between the existing hedgerow and the proposed fence line

Hedgerow to be planted and maintained at a height of 3.5m

Trees to be planted in groups adjacent to and within the hedgerow (see Tree Mix 2)

Trees to be planted in groups to avoid the creation of a single line of trees

Western and Southwestern Site Boundary hedgerows gapped up and planted with Hedge Mix 1 and new locally native tree species, especially oak and field maple.

Site Field 3.

Eastern Site Boundary hedgerows gapped up with Hedging Mix 1 and planted with new locally native tree species especially oak and field maple.

Off Site streamside hedge gapped up with Hedge Mix 3 & damp loving native trees, e.g. alder, together with further trees and scrub in 4m wide drifts along the Billing Brook.

Area sown with grasses with wildflowers and grazed by sheep.
For seed mixes see Landscape Design and After-care report.

Hedgerow to be maintained at a height of 3.5m

Existing hedgerow sections to be maintained at their existing height. New hedgerow sections to be planted and maintained at a height of 3.5m

Haddon Road

Hedgerow to be maintained at a height of 3m

Southern Site Boundary Recently re-laid hedgerow gapped up and planted with new locally native trees for drier soils.

Hedgerow to be planted and maintained at a height of 3m

Revision E Incorporates new permissive bridleway planting.

E 512400

Client: Wessex Solar Energy Developments Ltd.
Site: Land north of Haddon Road, Haddon, Peterborough
Project: Proposed Haddon Road Solar Park
Title: Landscape Masterplan Sheet 1 of 2.
Scale: 1:4,000 @ A3. Drawing No: LL149.01 G North
Prepared by: . WSE: 27.11.2023 OS Licence Number 100052783

Key

- Topographical Survey contours. Interval 5m.
- Existing trees, scrub and hedgerows with trees.
- Proposed enhanced native hedgerows with trees.
- Proposed native tree clumps / groups with scrub.
- Proposed solar panel rows with grass beneath.
- Proposed steel mesh "deer" fence 2.5m high.
- Existing ponds, streams, ditches and swales
- Proposed rolled stone site access track.
- Control Room and Inverters.
- Proposed regular climber planting along fence line

Native Hedgerows in Higher & Drier Open Areas – Mix 1.

Hedging Species	Nursery stock specification	% of mix.
<i>Acer campestre</i>	Field maple 60-80cms bare root	22%
<i>Corylus avellana</i>	Hazel 60-80cms bare root	20%
<i>Crataegus monogyna</i>	Hawthorn 60-80cms bare root	23%
<i>Quercus robur</i>	Oak 60-80cms bare root	22%
<i>Rosa canina</i>	Dog rose 60-80cms bare root	2%
<i>Sambucus nigra</i>	Elder 60-80cms bare root	3%
<i>Prunus spinosa</i>	Blackthorn 60-80cms bare root	5%
<i>Malus sylvestris</i>	Crab Apple 60-80cms bare root	3%

Native Trees for New and Gapped up Hedgerows.

Species	Nursery Stock Specification	Accessories	% of mix
<i>Acer campestre</i>	Field Maple 2.4m – 3.6m feathered whips	5 slow release fertiliser tablets. 1 short stake and tie. 1 spiral guard	30%
<i>Alnus glutinosa</i>	Alder (in damp soils)	As above	20%
<i>Quercus robur</i>	Oak	As above	50%

Native Hedgerows in Open Damp Areas – Mix 2.

Hedging Species	Nursery stock specification	% of mix.
<i>Acer campestre</i>	Field maple 60-80cms bare root	20%
<i>Cornus sanguinea</i>	Dogwood 60-80cms bare root	15%
<i>Crataegus monogyna</i>	Hawthorn 60-80cms bare root	20%
<i>Prunus spinosa</i>	Blackthorn 60-80cms bare root	15%
<i>Salix capraea</i>	Goat Willow 60-80cms bare root	10%
<i>Salix cinnerea</i>	Grey Willow 60-80cms bare root	10%
<i>Sambucus nigra</i>	Elder 60-80cms bare root	5%
<i>Rhamnus cathartica</i>	Buckthorn 60-80cms bare root	5%
<i>Populus nigra</i> *	Black Poplar 12-14cm standard	Occasional
<i>Salix alba</i> *	White Willow 12-14cm standard	Occasional

Specimen & Field Corner Tree Groups with Scrub understorey (Tree Mix 2)
To be planted as tree clumps at around 35-40m AOD with tree species at 8m centres underplanted with scrub species at 4m centres.

Species	Nursery Stock Specification	Accessories	Proportion
<i>Acer campestre</i>	Field Maple 12 -14 cms standards	9 slow release fertiliser tablets. 1 short stake and tie. 1 deer proof guard.	25%
<i>Betula pendula</i>	Silver Birch	As above	10% overall
<i>Betula pubescens</i>	Downy Birch	As above	10% overall
<i>Malus sylvestris</i>	Crab Apple	As above	10%
<i>Quercus robur</i>	Oak	As above	23%
<i>Castanea sativa</i>	Sweet Chestnut	As above	5%
<i>Tilia cordata</i>	Small leaved Lime	As above	10%
<i>Carpinus betulus</i>	Hornbeam	As above	5%
<i>Castanea sativa</i>	Sweet Chestnut	As above	2%
Understorey:			
<i>Corylus avellana</i>	Hazel 60-80cms BR	3 slow release fertiliser tablets. Protection.	30%
<i>Crataegus monogyna</i>	Hawthorn 60-80cms BR	As above.	40%
<i>Viburnum opulus</i>	Guelder Rose 60-80cms BR	As above	5%
<i>Euonymus europaeus</i>	Spindle 60-80cms BR	As above	10%
<i>Rosa arvensis</i>	Field Rose 60-80cms BR	As above	5%
<i>Rosa canina</i>	Dog Rose 60-80cms BR	As above	10%

Native Hedging Plants for Gapping Up Hedges in Shady Locations – Mix 3

Species	Nursery stock specification	% of mix.
<i>Cornus sanguinea</i>	Dogwood 60-80cms bare root	20% in damp places
<i>Crataegus monogyna</i>	Hawthorn 60-80cms bare root	35%
<i>Ilex aquifolium</i>	Holly 2 litre pot grown	10%
<i>Prunus spinosa</i>	Blackthorn 40-60cms bare root	10% in damp places
<i>Ulmus glabra</i>	Wych Elm 60-80cms bare root	10%
<i>Prunus spinosa</i>	Blackthorn 60-80cms bare root	10%
<i>Ligustrum vulgare</i>	Privet 60-80cms bare root	5%

Streamside Drifts of Field Trees with Scrub understorey (Tree Mix 1)
Where not planted within the existing hedgerow, these will be planted as drifts 4m wide along the east bank of Billing Brook. Such planting will be at around 20 - 25m AOD with tree species at 8m centres underplanted with scrub species at 2m centres, but 4m from the trunks of trees, within a 4m wide ribbon.

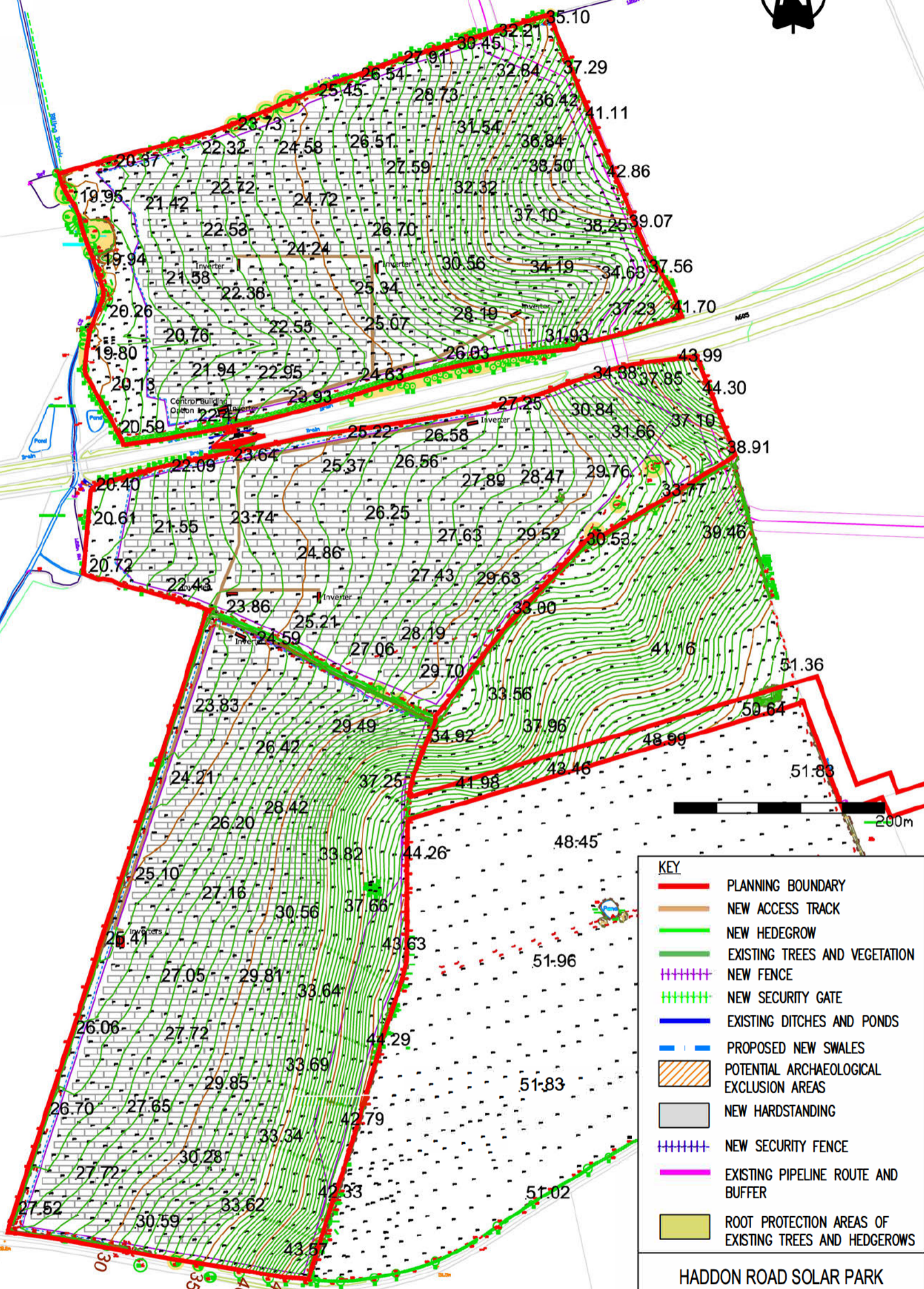
Species	Nursery Stock Specification	Accessories	Proportion
<i>Acer campestre</i>	Field Maple 10 -12 cms standards	9 slow release fertiliser tablets. 1 short stake and tie. 1 spiral guard.	30%
<i>Alnus glutinosa</i>	Alder	As above	30%
<i>Betula pubescens</i>	Downy birch	As above	15%
<i>Populus nigra</i> *	Black Poplar	As above	10%
<i>Salix alba</i> *	White Willow	As above	10%
<i>Salix fragilis</i>	Crack Willow	As above	5%
Understorey to drifts. To gap up the existing hedge use these trees plus Hedging Mix 2.			
<i>Cornus sanguinea</i>	Dogwood 60-80cms bare root	3 fertilizer tablets	30%
<i>Salix capraea</i>	Goat Willow 60-80cms bare root	3 fertilizer tablets	30%
<i>Salix cinnerea</i>	Grey Willow 60-80cms bare root	3 fertilizer tablets	20%
<i>Viburnum opulus</i>	Guelder Rose 60-80cms bare root	3 fertilizer tablets	10%
<i>Corylus avellana</i>	Hazel 60-80cms bare root	3 fertilizer tablets	10%

Native Climber Planting along perimeter fence in the northern field

Possible Species	
(Lonicera spp.)	Honeysuckle
(L. periclymenum)	

Revision E Incorporates new permissive bridleway planting.

Client: Wessex Solar Energy Developments Ltd.
 Site: Land north of Haddon Road, Haddon, Peterborough
 Project: Proposed Haddon Road Solar Park
 Title: Landscape Masterplan Sheet 2 of 2.
 Scale: 1:4,000 @ A3. Drawing No: LL149.01 G North
 Prepared by: WSE: 27.11.2023



KEY	
	PLANNING BOUNDARY
	NEW ACCESS TRACK
	NEW HEDEGROW
	EXISTING TREES AND VEGETATION
	NEW FENCE
	NEW SECURITY GATE
	EXISTING DITCHES AND PONDS
	PROPOSED NEW SWALES
	POTENTIAL ARCHAEOLOGICAL EXCLUSION AREAS
	NEW HARDSTANDING
	NEW SECURITY FENCE
	EXISTING PIPELINE ROUTE AND BUFFER
	ROOT PROTECTION AREAS OF EXISTING TREES AND HEDGEROWS

HADDON ROAD SOLAR PARK

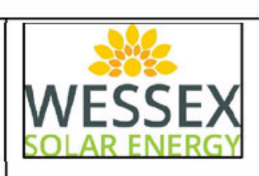
FIGURE 1.2D

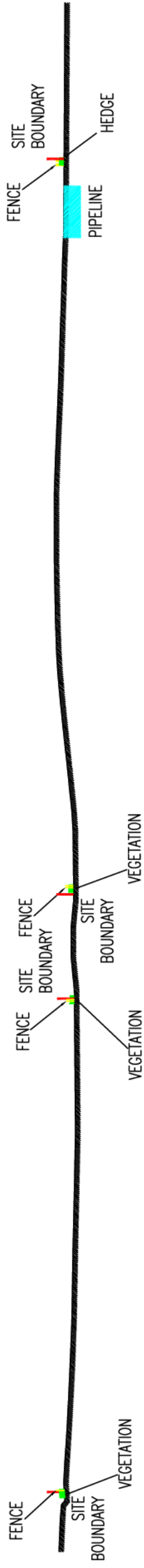
SITE BOUNDARY AND INDICATIVE LAYOUT - MAIN SITE PLUS TOPOGRAPHICAL DATA

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SCALE - 1:4,000
PLOT SCALE A3

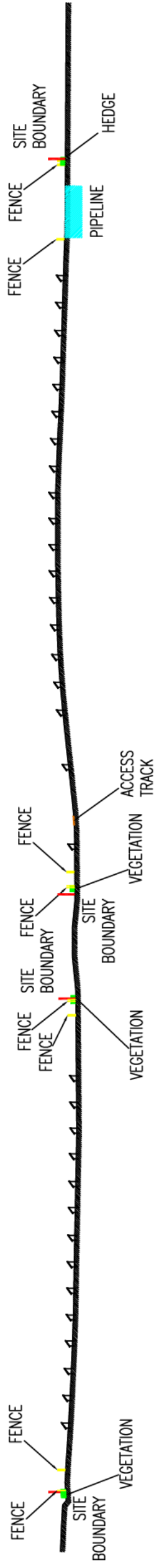
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Checked: WE
Approved: APPROVED
Date: 18/12/2022





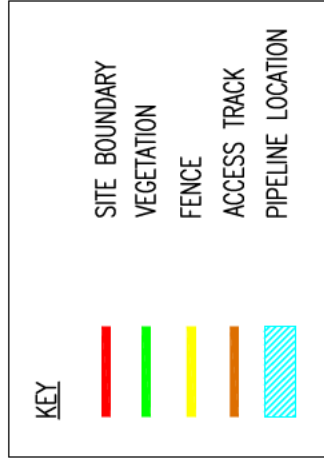
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Existing Site Elevation on A-A



SCALE - 1:2000

Proposed Site Elevation on A-A

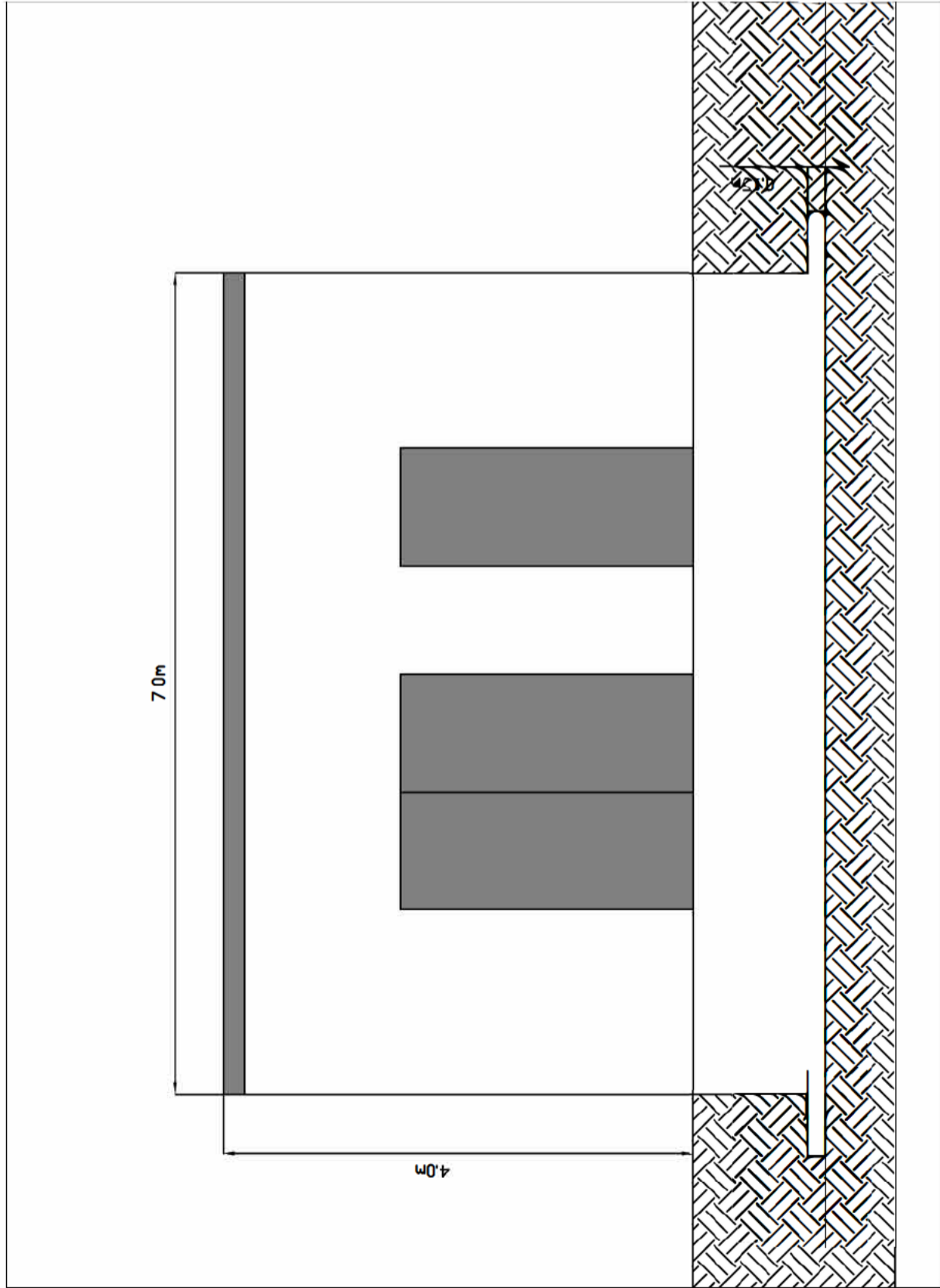


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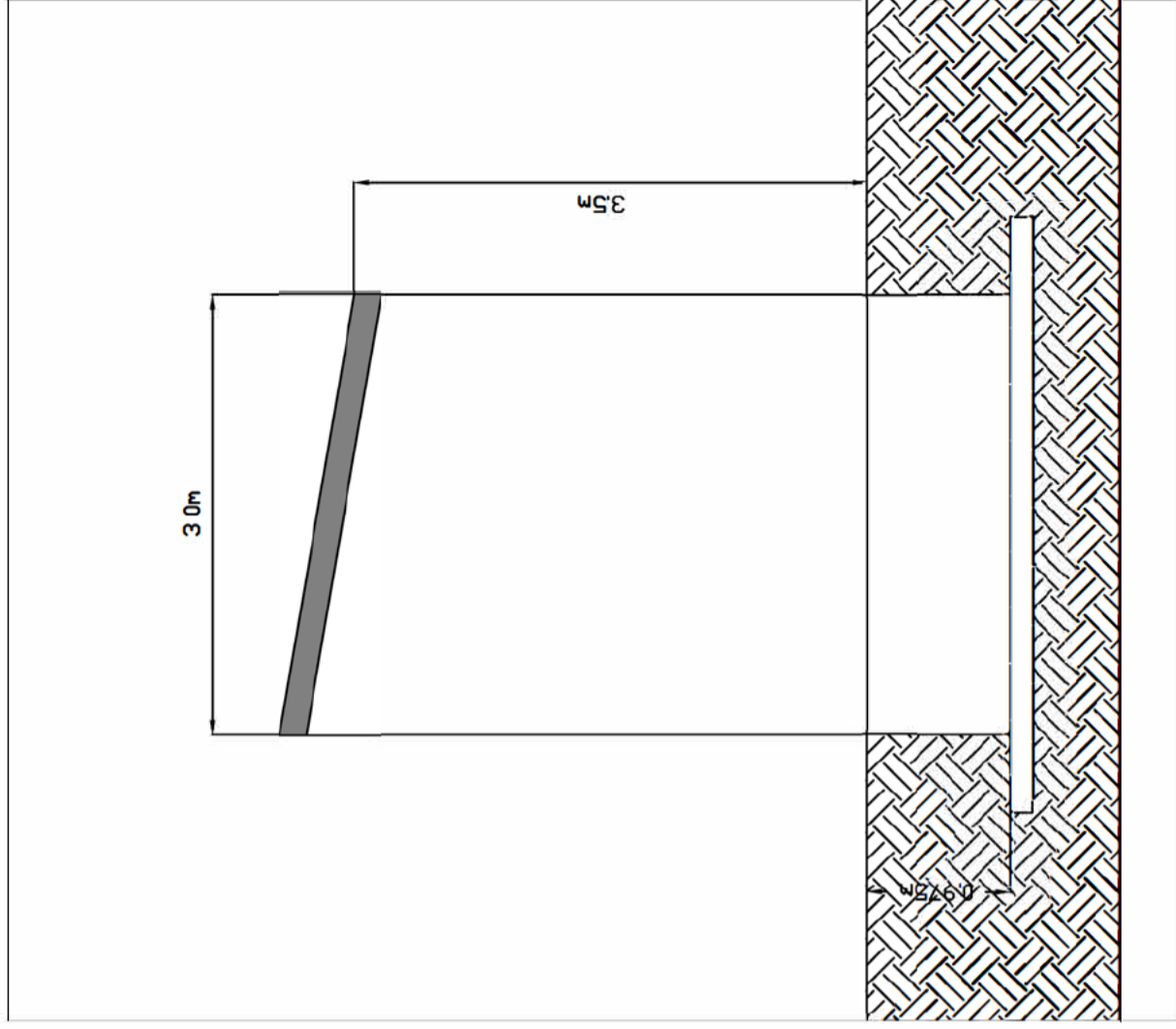
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PLOT SCALE A3

HADDON ROAD SOLAR PARK	
PLAN B	
EXISTING AND PROPOSED ELEVATIONS	
Drawn: CPA Checked: WSE Approved: APPROVED Date: 10/03/22	



FRONT ELEVATION



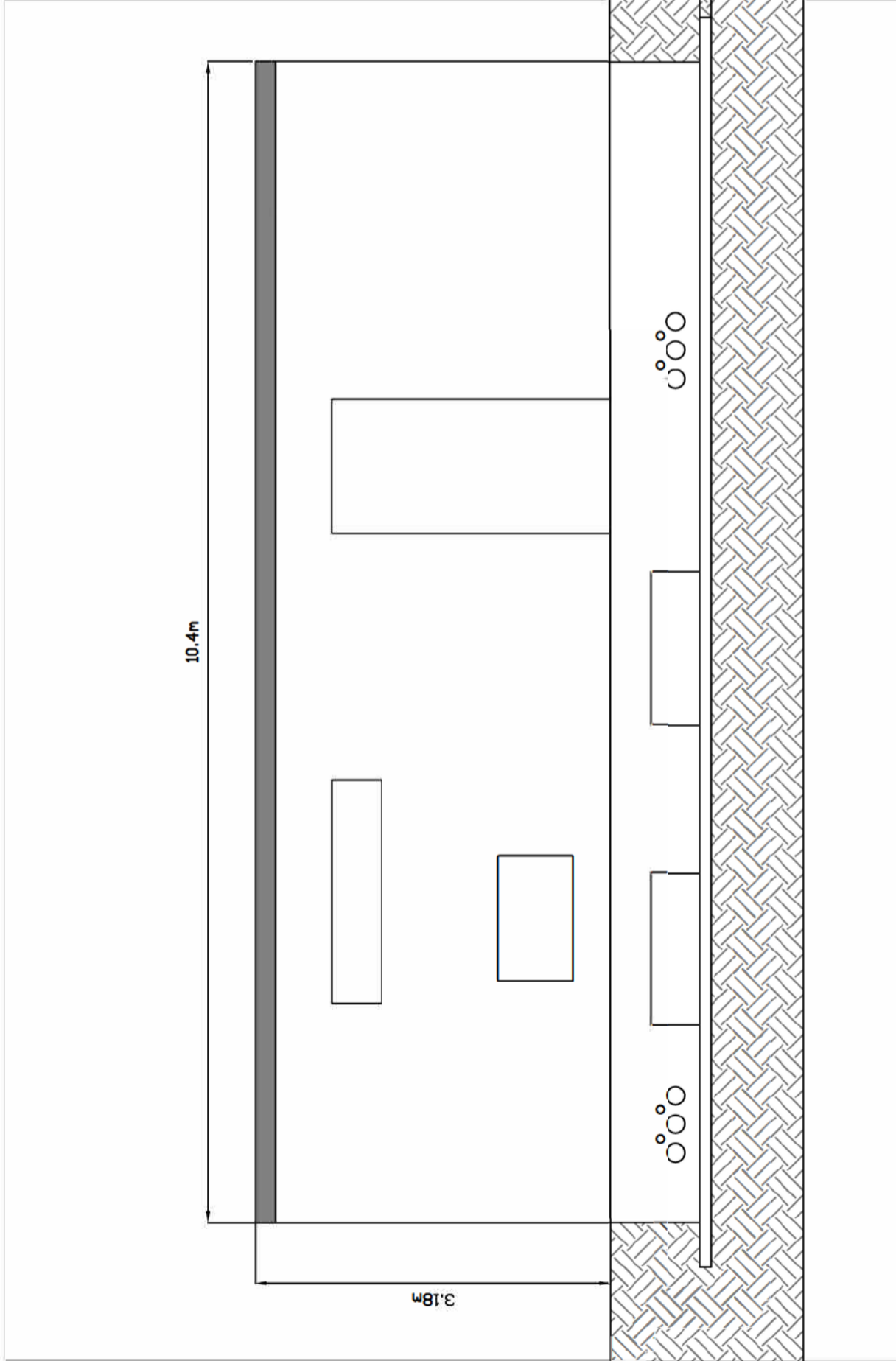
SIDE ELEVATION



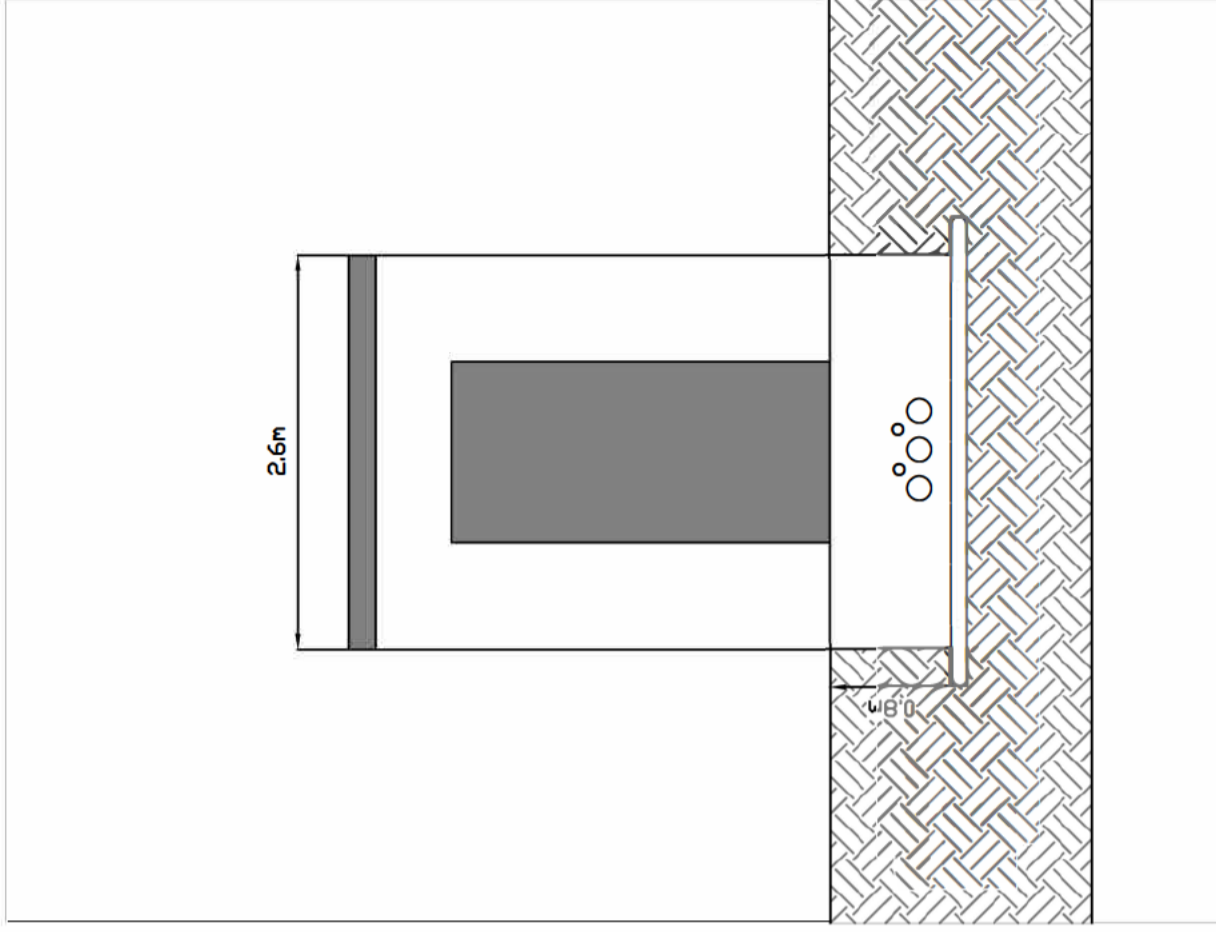
HADDON ROAD SOLAR PARK	
FIGURE 4.2B	
CONTROL BUILDING	

SCALE 1:50
PLOT SCALE A3

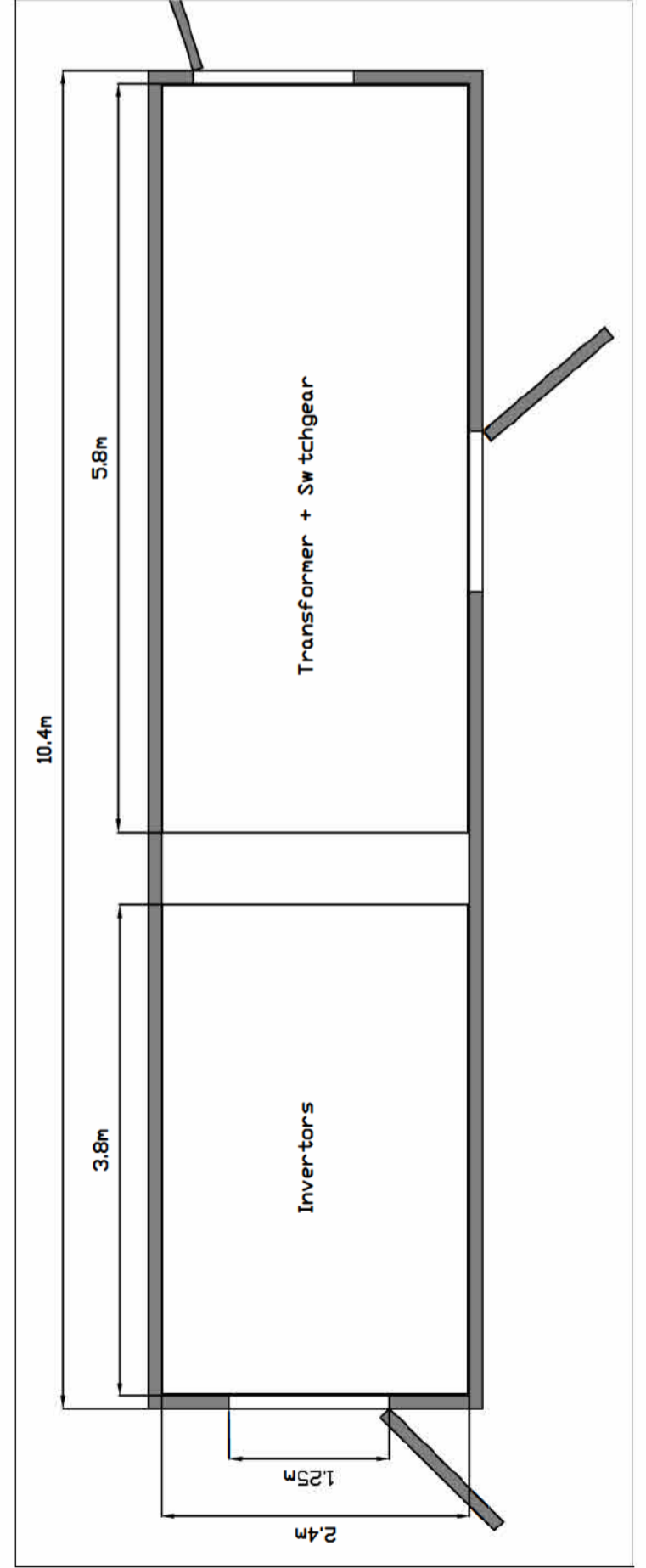
Drawn: CPA
Checked: WE
Approved: APPROVED
Date: 07/03/22




FRONT ELEVATION



SIDE ELEVATION



FRONT ELEVATION

HADDON ROAD SOLAR PARK	Drawn: CPA	
FIGURE 4.2A	Checked: WE	
INVERTER CABIN	Approved: APPROVED	
	Date: 07/03/22	

SCALE 1:50
PLOT SCALE A3