Crick Solar Farm

Planning Statement

Prepared on behalf of Voltalia UK Ltd

November 2022

bartonwillmore.co.uk

BARTON WILLMORE now Stantec

Crick Solar Farm

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Checked by:	JN	JN	JN
Authorised by:	JN	JN	JN

Barton Willmore, now Stantec
Studio 117
The Creative Quarter
Morgan's Arcade
Cardiff
CF10 1AF

Tel: 02920 660 910
Fax: 02920 660 911
Email: ben.kwok@bartonwillmore.co.uk

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APPENDICES

1.0 INTRODUCTION

1.1 This Planning Statement (PS) has been prepared by Barton Willmore, now Stantec on behalf of Voltalia UK Ltd (the Applicant) to accompany a full planning application to West Northamptonshire Council (WNC) (as the 'Local Planning Authority'), for a proposed solar photovoltaic (PV) farm on Land North and South of Kilsby Road, Kilsby, Daventry, West Northamptonshire ('the Site'; 'Crick Solar Farm').

1.2 Planning consent is being sought for the following Description of Development ('The Development'):

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

1.3 The Development comprises the construction, operation, management and decommissioning of a grid-connected solar farm with associated infrastructure (the 'generating station') to provide a reliable source of clean renewable energy for local consumers via the Distribution Network Operator (DNO) grid network.

1.4 The Development would contribute to local and national 'Net Zero' targets with an export capacity of up to 49.9 Megawatts (MW) of renewable energy. The annual output of the generating station will provide enough clean electricity to meet the annual electricity demand of approximately 14,194 average family homes.

1.5 The CO_2 displacement of the annual electricity production of the generating station is approximately 35,207 tonnes compared to the same annual electricity being generated by fossil fuels. This represents an emission saving equivalent to removing 5,826 average petrol cars driving 15,000 miles a year from the road every year.

1.6 The Statement sets out the planning policy context relating to the benefits and acceptability of the principle of the Development, assessed against the design principles and concepts that have been applied, and how environmental issues relating to the Development are addressed.

1.7 Whilst the PS is set out to be read as a standalone document, it should be read in the context of the entire submission documentation in order to fully understand the Development, its potential impacts and planning merits. Table 1.1 outlines the accompanying documents to this planning application, whilst Table 1.2 outlines the supporting plans.

Table 1.1 Document List

Document	Author
Application Form	Barton Willmore, now Stantec
Planning Statement	Barton Willmore, now Stantec
Design and Access Statement	Barton Willmore, now Stantec
Arboricultural Impact Assessment	Barton Hyett Associates
Agricultural Land Classification Assessment	Askew Land & Soil Ltd.
Ecological Impact Appraisal	Clarkson & Woods
Biodiversity Net Gain Assessment	Clarkson & Woods
Heritage Desk Based Assessment	Headland Archaeology
Written Scheme of Investigation for Archaeological Assets	Headland Archaeology
Geophysical Survey Report	Headland Archaeology
Solar Photovoltaic Glint and Glare Study	Pager Power
Flood Risk Assessment	RMA Environmental
Landscape and Visual Impact Assessment	Landscape Visual Limited
Noise Impact Assessment	InAcoustic
Transport Statement	Transport Planning Associates
Construction Traffic Management Plan	Transport Planning Associates
Statement of Community Involvement	Alpaca Communications

Table 1.2 Plan List

Drawing	Reference	Author
Location Plan	CRI01-PL-02	Voltalia
Site Plan (existing)	CRI01-PL-01	Voltalia
Layout Plan (proposed)	CRI01-PL-01	Voltalia
Array Elevation Details	CRI01-DV_CS_105_02_00	Voltalia
Inverter-Transformer Details	CRI01_DV_HV_111_02_00	Voltalia
Fence & Gate Details	CRI01-DV_CS_102_02_00	Voltalia
Access Track Details	CRI01-DV_CS_202_02_00	Voltalia
Customer Substation Details	CRI01-DV_HV_201_02_00	Voltalia
Control House Details	CRI01-DV_CS_601_02_00	Voltalia
DNO Substation Details	CRI01-DV_HV_101_02_00	Voltalia
CCTV Details	CRI01_DV-SEC_411_02_00	Voltalia
DNO Security Fence Details	CRI01-DV_CS_103_02_00	Voltalia
Storage Unit Details	CRI01-DV_CS_402_02_00	Voltalia
Weather Station Details	CRI01-DV_MON_421-02-00	Voltalia
Indicative Construction Compound	CRI01-PL-04	Voltalia
Landscape Strategy Plan	1294/11a	Landscape Visual Limited
Topographic Survey	N/A	Landmark Survey Wales

About the Applicant

1.8 **Experienced.** Founded in 2005 Voltalia is an experienced global renewable energy developer and Independent Power Producer (IPP) that specialises in solar, wind, hydro, biomass and storage. Operating in the UK since 2012, Voltalia has been responsible for the installation of 23 UK solar farms with a total capacity of over 246 Megawatts (MW) and is due to complete a further 196 MW across 4 solar farm sites in the coming year.

1.9 **Considerate.** Voltalia is a global company that understands the world is local. This is reflected in their approach to renewable energy development. Voltalia UK builds, owns, and operates the solar farms it develops as an IPP. This means that Voltalia makes a long-term commitment to every community in which it operates. Voltalia is committed to being a considerate neighbour and making a positive contribution wherever their sites are located.

1.10 **Collaborative.** The UK is facing a climate and energy crisis, which will require us all to play our part. As an experienced and established global company, Voltalia is focused on providing renewable energy schemes to help decarbonise the UK's electricity generation and combat the climate crisis by supplying an affordable and renewable source of clean electricity. And, as a company dedicated to solving global challenges through local development, Voltalia understands that consultation and engagement with local communities is vital to delivering the renewable energy development we all need.

Structure

1.11 This PS provides a background to the proposal and demonstrates the planning merits of the Development, having regard to relevant National and Local Planning Policy, as set out within the Local Development Framework, confirming that planning permission should be granted for the Development.

1.12 The remainder of this Statement comprises the following chapters:

- Section 2.0 provides a description of the Site, its surroundings and any relevant planning history of the Site, as well as a description of the Development;
- Section 3.0 sets out the sequential site assessment undertaken for the Development;
- Section 4.0 sets out the approach to engagement and pre-application discussions;
- Section 5.0 sets out the relevant national, regional and local planning policies and guidance relevant to the Site and the Development;
- Section 6.0 considers the main planning issues and provides an assessment of how the application complies with planning policy; and
- Section 7.0 summarises the Planning Statement and draws conclusions.

2.0 THE APPLICATION SITE AND DEVELOPMENT PROPOSAL

The Site

2.1 The Site extends to 54.9ha and is located 1.1km to the east-southeast of the village of Kilsby and 1.2km south-west of the village of Crick. The Site is approximately 4km south-east of Rugby, 5.5km north-east of Daventry and 14km north-west of Northampton. A Site Location Plan can be found at **Appendix A**. The Site is wholly within the jurisdiction of West Northamptonshire Council as the Local Planning Authority.

2.2 The Site is currently in agricultural use, consisting of a number of primarily pastoral fields separated by hedgerows and drainage ditches. The Site is bound by the M1 to the east, the M45 to the south and the A5 to the west. The northern part of the eastern boundary lies adjacent to part of the Northampton Loop of the West Coast Mainline railway, leading to the Daventry Inter Rail Freight Terminal (DIRFT) approximately 800m north of the Site. Within the open countryside around the Site are isolated homes, commercial premises, and some larger agricultural enterprises.

2.3 Kilsby Road delineates the Site, with fields to the north of Kilsby Road henceforth referred to as Parcel 'A', and land south of Kilsby Road referred to as Parcel 'B'. Parcel A extends to 49.1ha and Parcel B extends to 5.8ha. Figure 1 provides an aerial image with a red outline to provide context to the Site.

Figure 1 – Aerial Photograph of the Site Context

2.4 The main vehicular accesses to the Site are from existing field accesses from Kilsby Road. Kilsby Road is a single-carriageway with a posted speed limit of 60mph. Kilsby Road connects to the A5 to the south-west, which in turn provides access to the wider strategic road network.

2.5 The Site is relatively unconstrained in terms of environmental designations. There are no designated ecological sites (SSSI, Ramsar, SPA, SAC) within a 5km radius of the Site. The Site is approximately 50m from the Watling Street Roman Road Scheduled Ancient Monument to the north-east, which is a linear feature which runs parallel to the northern boundary. The Site is located approximately 500m from the Grade II* Listed North Ventilation Shaft of Kilsby Tunnel and 400m to the Grade II* Listed South Ventilation Shaft of Kilsby Tunnel. There is a cluster of Grade II Listed Buildings within the villages of Kilsby and Crick. There are no Registered Parks or Gardens within a 1km radius of the Site.

2.6 The Site is located entirely within Flood Zone 1 (Low Risk), as shown on the Environment Agency's Flood Map for Planning.

2.7 There is a single Public Right of Way (PRoW) (Footpath EW2) crossing the Site to the north, within Parcel A.

2.8 The Site primarily consists of agricultural land which is identified as predominantly Grade 3b by the Agricultural Land Classification (ALC) Report submitted as part of the application package. The ALC concludes that the Site is approximately 32.0ha of lower quality Grade 3b (58% of the Site) which is not classified as Best and Most Versatile (BMV) farmland. The ALC report states that the Site contains 7ha of Grade 2 (13% of the Site) and 15.7ha of Grade 3a (28.5% of the Site) which are classified as BMV land.

Planning History

2.9 There is no relevant planning history for the Site or the immediate surroundings. Planning applications relating to solar farm development are summarised in Table 2.1 below.

Table 2.1 Historic Solar Planning Applications in WNC

Reference	Address	Description	Status	Decision Date
DA/2014/0016	Land off West Haddon Road, Guilsborough, Northamptonshire	*Construction of solar park*	Approved	15th April 2014
DA/2014/1026	Land off Welford Road, Boughton, Northamptonshire	*Installation of a solar park*	Refused	13th March 2015
DA/2014/0694	Land off Walgrave Road, Hannington, Northamptonshire	*Construction of ground-mounted solar park and associated fencing, equipment housing and access tracks*	Approved	9th July 2015

DA/2015/0764	Land at White Lodge Farm, Kettering Road, Walgrave	*Installation of ground-mounted solar photovoltaic panels*	Approved	17th November 2015
DA/2020/0200	Land off Crick Road, Yelvertoft, Northamptonshire	*Construction of a solar farm to generate up to 49.9MW of energy, comprising of ground-mounted solar panels, new vehicular entrance onto Crick Road with internal access tracks, and other associated infrastructure including substation with tower, control room, inverter, transformers, containers, security fencing, CCTV, and landscaping works.*	Approved	19th November 2020
WND/2022/0243	Land off Rugby Road, Kilsby, Northamptonshire	*Construction of a solar farm to generate up to 13MW of energy, comprising of ground-mounted solar panels, internal access tracks, and other associated infrastructure including DNO substation, control house, transformers, fencing, CCTV and landscaping works.*	Registered 14th July 2022	-
WND/2022/0410	Land at Glassthorpe Hill & Land off Brington Road, Flore, Northampton	*Change of use from agricultural land to solar farm and construction and operation of a solar photovoltaic (PV) development with a capacity of up to 49.9MW with associated infrastructure and planting.*	Registered 20th April 2022	-
WND/2022/0447	Land off West Haddon Road, East Haddon, Northamptonshire	*Installation of 2MW ground-mounted solar photovoltaic system to supply Grovelands Business Park*	*Registered 20th May 2022*	-

2.10 A review of solar farm applications in WNC reveals key determining factors include:

- The NPPF guidance that applicants should not be required to demonstrate the overall need for renewable energy and authorities should approve the application if its impacts are (or can be made) acceptable, unless material considerations indicate otherwise.
- An effective landscape strategy including visual screening/mitigation measures used to help reduce visual impact with respect to the location of solar panels, the retention and use of existing landscape features, and additional planting of hedgerows and trees.
- Development should seek to limit the use of 'Best and Most Versatile' agricultural land.
- Impacts on the setting of heritage assets and consideration of buried archaeology.
- Early consideration of construction traffic – routing of delivery vehicles, HGVs, etc.
- Impacts of areas of higher Flood Risk.

The Development

2.11 The Development is a renewable energy generating station comprising ground-mounted solar photovoltaic arrays together with ancillary infrastructure and landscaping and biodiversity enhancements on land north and south of Kilsby Road. The solar farm will have an export capacity of up to 49.9MW of renewable electricity at peak operation and is proposed for an up to 40-year period. A suite of detailed drawings accompanies this submission as per Table 1.2 and a fuller description of the elements of the Development is provided within the DAS. These include the following:

- Solar PV panels, ground-mounted onto a pile-driven sub-structure framework;
- 11 No. Inverter/Transformer Stations distributed across the solar farm;
- String Combiner Boxes to combine multiple strings of PV panels;
- 1 No. Customer Substation;

- 1 No. Customer Control House (if not incorporated into the Customer Substation)
- 2 No. Spares Containers for maintenance;
- Compacted internal crushed stone tracks, rolled in layers to allow vehicular access from the highway and around the Site between field parcels;
- 2m high security fencing (deer fencing) with double wing gates to enclose the perimeters of the Site and allow sheep to graze securely;
- Security and monitoring CCTV/infra-red cameras mounted on poles along the perimeter;
- Pole-mounted weather station;
- Underground and cable tray cabling to connect the panels, inverters-transformer units to the proposed on-site substation units and DNO infrastructure;
- 1 No. DNO 132kV Substation Building with Point of Connection (POC) compound containing external electrical equipment;
- 2m-2.4m high Weld Mesh security fencing around the DNO POC infrastructure;
- Construction and operational site access from the existing access off Kilsby Road; and
- Landscaping planting, biodiversity enhancements.

2.12 The POC is located within Parcel B to the south of the Site and consists of an existing 132kV overhead electricity line. This is shown on the Site Layout Plan.

Landscape and Biodiversity Proposals

2.13 Key landscape mitigation and biodiversity enhancement measures are as follows:

- Delivering a calculated 77% net gain for habitats and 127% gain in hedgerow units;
- The provision of a new Permissive Path along the western boundary, providing a positive new linkage between the Kilsby Road and Footpath EW2 through the Site;
- Removal of the stile and replacement with a more accessible "kissing gate" (or similar) at the entrance to PRoW EW2 from Byway EM20 for improved accessibility for users;
- Species-rich native wildflower meadow to perimeter buffer areas and along PRoW. Along with aesthetic value, wildflower species will attract insects and in particular, bees;
- Species-rich grassland pasture grassland across the majority of the Site is to be managed via low-intensity sheep grazing to promote biodiversity net gain and soil carbon sequestration;
- Areas of tussocky grassland or diverse meadow seeding where panels are not present;
- Enhancing existing hedgerows to be species-rich. All existing hedgerows will be surveyed for gaps pre-commencement and reinforced with appropriate tree and hedge species;
- New native species hedgerows interspersed with trees. Along with improving screening, these will increase boundary connectivity and foraging opportunities;
- New tree planting will also be included within the hedgerow network to replace the ash trees lost and provide new habitat for species such as bats;
- The provision of 10 No. bat boxes will be installed on mature trees facing in different directions to increase year-round roosting conditions within the Site;
- At least 6 No. Schwegler 3S Starling Box (or similar) to compensate for the loss of trees already felled, with additional starling boxes to provide compensation for any additional tree removals;
- The provision of 10 bird boxes to include Schwegler 1b general bird boxes, wren roundhouses, starling boxes etc. within existing hedgerows and mature trees for species including: robin, wren, blue tit, great tit, coal tit, nuthatch, house sparrow and starling;
- 2 amphibian/reptile hibernacula located in the tussocky grassland areas;

- Provision of log piles to benefit invertebrates, hedgehogs, reptiles & amphibians; and
- Mammal gaps in perimeter fencing with wildlife sympathetic groundskeeping regime.

Construction Methodology

2.14 The following summary of the overall construction approach is expanded on in the DAS. The Construction Traffic Management Plan (CTMP) sets out a detailed management scheme in relation to transport/access. It is envisaged that a Construction Environmental Management Plan (CEMP) would be provided as a Pre-Commencement Condition of any planning consent.

2.15 Construction is estimated to be approximately 30 weeks, consisting of the following principal operations:

- Erection of security fencing and gate;
- Setting down the temporary construction lay-down area;
- Delivery of solar panels, mounting frames, and ancillary units;
- Installation of the mounting system and solar panels;
- Installation of ancillary units;
- Cable trenching, ducting & backfilling;
- Commissioning of the generating station equipment and grid connection;
- Site reinstatement and ecological enhancement; and
- Demobilisation from the Site.

2.16 Construction and operational phase vehicles will access and egress the Site via an existing access to Kilsby Road for both Parcel A and B. All traffic associated with the construction phase will utilise this access and be able to enter and exit in forward gear. If ground conditions dictate, wheel washing facilities will be provided to ensure no mud or loose material is transferred onto the local highway network by construction vehicles. Further details are found within the CTMP.

2.17 All construction worker and delivery vehicles will park or offload in a temporary construction compound close to the access within Parcel A. This compound does not form part of the Development. In the event of the Development being granted planning permission, the compound would be provided under associated Permitted Development rights. The compound will house temporary site office cabins and welfare facilities for contractors. The area will also be used for refuelling, waste management, and tools/materials storage. The temporary compound will be constructed using a geogrid base, or similar, to facilitate removal and reinstatement.

2.18 The number of vehicles travelling to and from the Site will vary throughout the construction phase. Assuming a seven-month construction period, on average there would be c. 5 HGV deliveries (10 two-way movements) per day. Proposed working hours are 0700-1900 Monday to Friday and 0800-1330 on Saturdays with no construction on Sundays or Public Holidays.

2.19 These and other methods to minimise the effects of construction vehicles on the local road network and impact on local communities are detailed within the CTMP. This has been informed by a Transport Statement (TS) detailing the proposed routing and access strategy.

Operations

2.20 Once operational, the Development will be monitored remotely and will not require permanent staff to be located on-site. Occasional maintenance activities will be required for groundskeeping, cleaning of the solar panels, checks on equipment and occasional visits to the substation by the DNO. Based on the Applicant's experience with other solar farm projects it is expected that the operational development could require up to two maintenance visits per month in cars or transit van-type vehicles, using the access from Kilsby Road.

2.21 Vegetation will grow under the solar panels and around the field margins, which will require ground maintenance. It is envisaged that a Landscape and Ecological Management Plan (LEMP) will be conditioned to any planning consent and set out how the land would be managed and monitored throughout the Development's operational lifetime. It is proposed that the Site would be maintained in co-located pastoral agricultural use through low-intensity sheep grazing and managed to deliver positive biodiversity net gains.

Decommissioning

2.22 At the end of the proposed up to 40-year operational period, the solar farm and its ancillary equipment will be decommissioned, dismantled and removed and the site will be fully reinstated to the satisfaction of the local planning authority and returned to its agricultural use.

2.23 Where possible, all the solar farm components will be removed and reused or recycled. Where this is not possible, any waste generated during decommissioning will be removed and transported by a certified and licensed contractor.

2.24 The traffic management and reinstatement works of the decommissioning phase will be addressed in an appropriately timed Decommissioning Plan as required by planning condition in the event planning permission is granted.

3.0 SITE SELECTION

3.1 The UK electricity network faces exceptional challenges to meet the government's target of reducing carbon emissions. This will largely be achieved through decommissioning carbon-intensive energy plants and increasing low carbon generation such as wind and solar. Voltalia has undertaken a robust and effective site selection exercise to identify suitable areas for solar development to meet the electricity demand within this network area. This section of the PS outlines the site selection process that the Applicant has undertaken. A more in-depth insight into site and design refinement is set out in the DAS.

3.2 The site selection exercise has been undertaken with regard to a number of different planning policies, environmental and technical criteria including:

- The availability of DNO grid capacity and viability of a grid connection;
- Suitability for solar generation;
- Land availability;
- Accessibility
- Compatibility with national and local planning policy;
- Preference for previously developed land or industrial settings;
- Agricultural Land Quality;
- Visual impact; and
- Proximity to sensitive landscapes and areas of designated environmental significance.

3.3 The following summary sets out how the site has been selected and refined and can be read alongside the DAS; it is proportionate to the scale and nature of the proposed development and aligns with the view of the Inspector in Planning Appeal APP/Z3825/A/14/2219843 (Horsham District Council) which states at Paragraph 31 "*A sequential test for the siting of solar farms is not an explicit requirement of either the development plan or the Framework*".

Requirements for Solar Generation

3.4 The following sub-headings set out the principal requirements for Solar PV Farm Development.

- **Grid Capacity** – Identify any local substations or points of connection with capacity to accept additional generation and secure a Grid Offer. This is essential to an energy project.
- **Environmental Suitability** – Review of high-level planning/environmental constraints, including suitability for solar generation, via desk-based sources.
- **Land Availability & Productivity** – Approach landowners within a search area from the point of connection to discuss the availability of land for the potential Solar PV Farm.
- **Planning Suitability** – Detailed assessment of land available for the proposed project which must be suitable and achievable from a planning perspective.

Grid Capacity

- **Available Grid Connection Capacity:** The DNO must be able to offer a Point of Connection (POC) with capacity to accept the output of the solar park. Finding available capacity is one of the biggest challenges facing renewable energy development.
- **Avoiding Energy Loss:** A site must be located close to a POC to avoid transmission losses. The greater the distance, the more energy is lost along the way. Locating a site far from a POC is not an efficient use of land; it means there is less clean energy getting to the grid from the same land use area, which undermines the principles of sustainable development.
- **Route to Connection**: The cost of cable to connect into a POC is c.£0.5m per km. There are often technical considerations which mean that cable paths of an off-site POC cannot be 'as the crow flies'. A site 1km from a POC is likely to have at least a 2-3km cable route. This can be for DNO requirements, land-ownership constraints, or to avoid undue construction impact. A site with an on-site POC is therefore optimal to avoid disruption and transmission loss.
- **Viability & Site Search Area:** A site selection methodology for a solar farm of this scale (<50MW) is unlikely to be viable beyond a 1km radius from a POC based on cable route to POC, not direct distance. A good methodology requires that an on-site substation should be no more than 1km from a POC. Any additional distance over 1km would incur excessive connection costs and export losses that compromise viability. If the grid is known to have capacity, it is considered that 5km section of the 132kV HV line to which the proposed solar farm would connect is a reasonable extent to consider.

Environmental Considerations

- **Suitability for Solar**: Any site must be fit for the purposes of solar energy generation. Field patterns, shade factors, topography, and ground conditions must be suitable for construction and output optimisation.
- **Accessibility:** Site selection must consider connectivity with the Highways network for safe access. It also has to be suitable for the implementation of a CTMP that can avoid or mitigate impacts.
- **Flood Risk:** Although solar panels are not vulnerable to flooding and will not increase risk elsewhere, where possible the site selection process will prefer areas with lower flood risk.
- **Protected Species / Habitats:** Although protections can be put in place for protected species and habitats, site selection will prioritise areas without high risk of the presence of protected species or where conditions would inhibit ecological mitigation in construction.

Land Use (Planning) Considerations

- **Landscape & Heritage Designations**: Potential land within the Search Area is screened in relation to statutory and local heritage and landscape designations. This includes Green Belt, AONB, Conservation Areas, and above/below ground heritage assets.
- **Environmental Designations:** A search considers proximity to ecological areas like SSSI, RAMSAR, LNR, Special Areas of Conservation, and Special Protection Areas.
- **Planning Policy:** Site selection is mindful of national and local planning and environmental policy. This ranges from requirements in the NPPF, Local Plan, and Neighbourhood Plans.
- **Sustainable Development:** All solar farms will entail some sort of impact so a site must be capable of multifunctional enhancements to support the economic, environmental, and social dimensions of sustainable development. A good site will be able to incorporate visual mitigation to protect and enhance PROWs, and to enable Biodiversity Net Gain.

Land Availability & Quality

- **Agricultural Land:** For the UK to meet its Net Zero objectives we require solar farms of too large a scale to rely on only rooftops and brownfield land. And, most brownfield sites are likely to be needed for long-term permanent housing and economic development. A solar farm is only a temporary use that does not change the agricultural land classification. A key site search consideration is to avoid, where possible, *"best and most versatile"* agricultural land.
- **Land Availability**: Site options are restrained by land availability. It is important to focus on estates that are large enough to incorporate renewables as part of a temporary diversification that will not compromise the overall viability of the primary farm operations.
- **Continued Agricultural Use:** Site selection will aim for opportunities to co-locate with ongoing agricultural operations. At present this is most likely to be sheep grazing, although innovations in agrivoltaics mean that crops may also be viable on sites in the mid-term future.

Site Selection

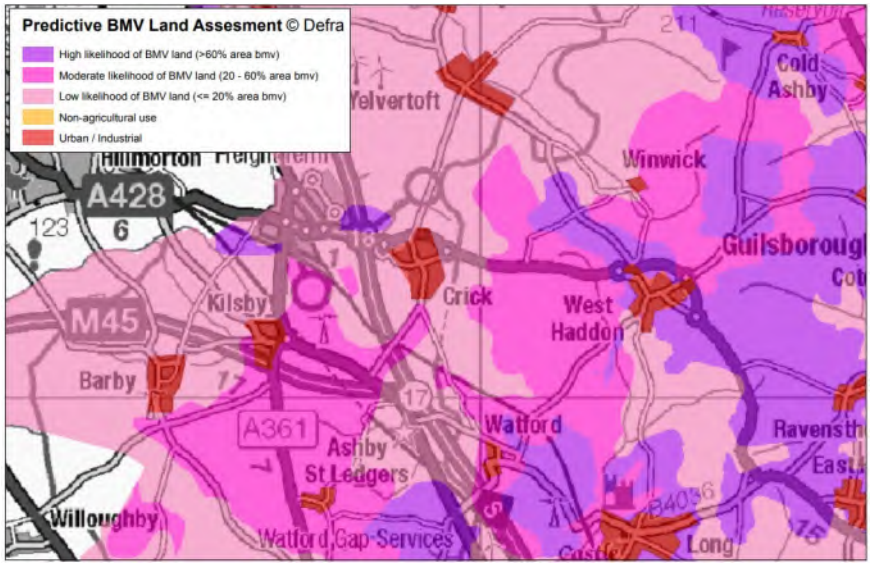
3.5 The process of finding capacity to 'connect into' the grid is a key determinant of whether a site may be viable for solar. For this development, potential non-agricultural, urban, and previously developed land (PDL) (or 'brownfield land') was identified and considered. Daventry District Council maintain a Brownfield Land Register. These are predominantly PDL areas (as defined in NPPF Annex 2) and the record is updated annually. There are 3 brownfield land sites within the Register for 2020.

3.6 The PDL sites range in size and location from 0.17 ha to 2.77ha. These sites were therefore discounted from the outset as an insufficient quantum of solar development would be able to be sited, meaning that the Development would be unviable. This is before considering any of the additional site constraints listed above. Furthermore, the majority of the PDL sites are either subject to a planning application for residential development or are allocated within emerging Local Plans for residential development. Therefore, although considered, given the scale of the Development, no such land was considered to be suitable or available.

3.7 Having identified grid capacity along the 132kV line crossing Parcel B of the Site, and having established the lack of brownfield viability, the Applicant undertook a site selection exercise as outlined by the key criteria in the sections above. As outlined in Section 2.0, there are a number of historic energy developments in the area, including on-shore wind development.

3.8 An environmental constraints exercise was undertaken in proximity to the grid connection. Figure 2 below provides an overview of the Natural England predictive BMV agricultural land classification in the area, whilst Figure 4 provides an overview of the key environmental constraints relative to the POC search area.

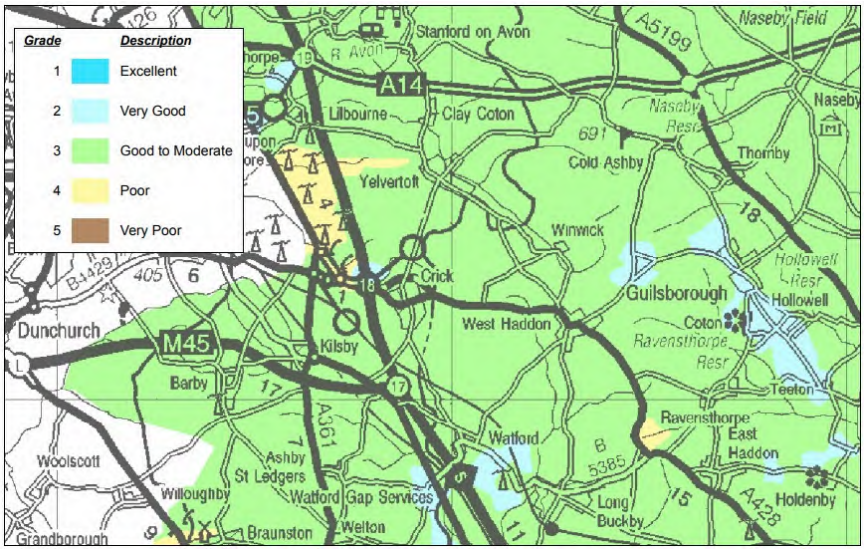
Figure 2: Predictive BMV Land Assessment (017)



3.9 Because a solar farm is temporary and will not affect a permanent loss of agricultural land, and because of the preference of brownfield land for permanent housing and employment development, it is unlikely that solar farms of the scale required to meet local and national Net Zero commitments are possible on PDL. Therefore, the use of agricultural land for such projects is expected and acceptable, with responsible site selection targeting land of lower grade and avoiding BMV land where possible. ALC017 extracted above at Figure 2 demonstrates that much of WNC benefits from moderate-high quality agricultural land with patches of low to moderate quality land in proximity to the 132kV line with grid capacity, thus making this a suitable location to consider a solar farm development.

3.10 Noting that viable land in the search area is agricultural, the Applicant consulted the Regional Agricultural Land Classification maps (ALC05; Figure 3)[i] which identifies much of the area's land as '3 Good to Moderate'. Importantly, this excludes areas of Grade 1 and Grade 2 land.

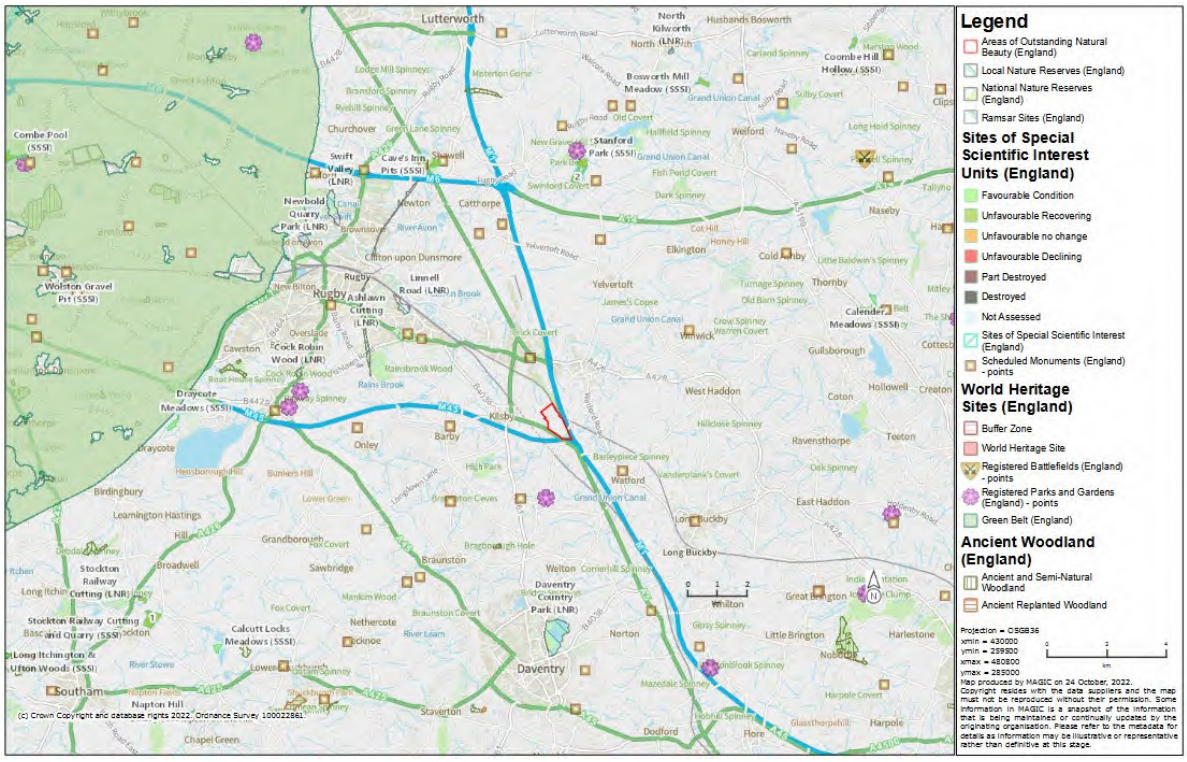
Figure 3: Regional ALC 005



3.11 A key stage of the site selection exercise is to scope out more sensitive designated land such as Green Belt, AONB, National Park and any land allocated for development in the WNC Local Plan. Land is then screened for proximity to and mitigation potential in respect of environmental and heritage designations such as RAMSAR, SSSI, priority habitat areas, Conservation Areas, and Listed Buildings. Other constraints that are not ideal, but resolvable, such as flood risk or potential archaeology, are also weighed into the selection process.

3.12 As outlined at Figure 4, the immediate area is relatively unconstrained.

Figure 4: MAGIC Maps Extract including key Environmental Constraints



3.13 Having determined the area was likely to be suitable to host a solar farm development the Applicant then sought to secure land within an appropriate proximity to a DNO point of connection. The Development is known as Crick Solar Farm because it originally included some of Parcel A along with a much larger area of land east of the M1 within Crick Civil Parish that included the POC. As set out in Section 4 Pre-Application Advice helped refine the scheme and reduce impacts leading to a Site that is well contained by transport infrastructure, outside of more sensitive landscape areas south of Crick, and with no adverse environmental impacts.

3.14 The above represents a proportionate insight into the site selection methodology for Land North and South of Kilsby Road a Solar Farm. The Applicant has followed a sequential approach which has taken account of technical, environmental, and planning considerations in accordance with best practice and national policy. Further discussion of agricultural land use is at Section 6.0 herein.

4.0 PRE-APPLICATION ADVICE & COMMUNITY CONSULTATION

4.1 This section provides an overview of the stages of pre-application engagement with WNC (as Daventry District Council (DDC)), the local community, and other stakeholders prior to submission. A full account of community consultation undertaken is provided in the Statement of Community Involvement (SCI).

Pre-Application Advice

4.2 Pre-application advice was sought from Daventry DC on the 13th October 2020 (Ref: SH/P/20/182) relating to a 49.9MW solar farm to the south-west of Crick. The submission was supported by a detailed letter which set out the proposals, a red-line Location Plan and culminated in a site visit with the Council. This submission comprised 13 fields in three distinct parcels located to the east and west of the M1, south-west of Crick. The red line is shown on Appendix B.

4.3 A written Pre-application Response was provided on the 9th November 2020. The Planning Officer provided a number of comments and areas of contention. This included areas of concern relating to historic environmental assets located within land parcels to the east of the M1. Further concerns related to any landscape impacts owing to the topography of fields located to the east of the M1, particularly within fields with prominent topography.

4.4 This pre-application advice has resulted in a refinement of the red line boundary for the Site, to exclude parcels of land indicated by Daventry DC as unsuitable for solar development. This is detailed within the DAS supporting this application, with the differences in the spatial extent of the Site shown in comparison of Figure 1 and Appendix B. The Site now includes land to the south of Kilsby Road (Parcel B) and additional fields to the north of Kilsby Road alongside the northern edge of Parcel A.

4.5 Policy-specific advice and how this application meets requirements thereof is more fully detailed and addressed in the relevant sections of the PS to follow. The Pre-application advice response also indicated a number of technical documents which would be required to support any planning application, such as a TS and CTMP which have been prepared.

4.6 Discipline-specific pre-application advice has also been undertaken, including with the WNC Landscape Officer with respect to agreement of the LVIA methodology and appropriate viewpoints for photographs. There has been continued engagement with the Northamptonshire County Archaeologist regarding a geophysical survey, including the strategy relating to the results of the survey and methodology for any additional post-determination fieldwork in terms of a Written Statement of Investigation (WSI). National Highways have also provided advice, also recommending a TS and CTMP as well as information that should be considered for an

effective Glint & Glare Assessment. This advice has been taken on board and is included in the Glint and Glare study provided with the planning application.

EIA Screening

4.7 An Environmental Impact Assessment (EIA) Screening Request was submitted to Daventry District Council on the 20th May 2020 (Ref: EIA/7/133) under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017[ii], as amended.

4.8 Daventry DC issued their Screening Opinion on the 10th June 2020 (Appendix C), which determined that the Development did not constitute EIA Development. As with the pre-application advice, this Screening Opinion related to a previous iteration of the boundary which has since been amended from a larger non-contiguous site to a smaller scheme with reduced landscape and visual effects and reduced potential for environmental and amenity impact. (See Appendix B).

4.9 The Development was considered against the indicative threshold set in Schedule 2 (3)(a) of the EIA Regulations and the Development would not be likely to have significant effects on the environment by virtue of factors such as its nature, size, location and cumulative impact. The Screening Opinion noted that issues relating to the adjacent Scheduled Monument at Watling Street Roman Road and any outlying Listed structures could be dealt with through a Heritage Impact Assessment. The environmental impacts of the Development have been considered through the suite of supporting technical reports listed in Table 1.1.

4.10 It is maintained that the Development is unlikely to produce significant environmental effects and is not EIA Development. The amendment to the Site boundary does not introduce any new environmental constraints and has lessened the environmental impact for disciplines such as Landscape, as outlined in the planning application's DAS.

Community Consultation

4.11 The Applicant is committed to meaningful engagement with local residents and stakeholders. Voltalia recognise that proactive pre-application discussions lead to better design and more well-informed planning applications, with improved outcomes for all involved. This section summarises some of Voltalia's community engagement efforts ahead of the submission. An account of the pre-application consultation process is provided in the application's SCI.

4.12 To facilitate public participation Applicant has provided a dedicated project website and hosted a series of in-person exhibition events and online web events along with dedicated briefings at the Parish Council level. The Applicant reached out to Kilsby PC, Crick PC and Watford PC in June 2022 which resulted in the Applicant presenting at Kilsby PC and Crick PC's monthly meetings, to provide detail on the Development in advance of public exhibition events.

4.13 Two days of public consultation were held on the 1st and 2nd September 2022 at Kilsby Village Hall and Crick Old School respectively. An online virtual event was also held on the evening of 6th September 2022 for those unable to attend in-person events. These exhibitions provided an opportunity for local residents to find out more about the project from the Applicant, to ask questions, and provide feedback.

4.14 The Applicant has engaged with stakeholders by email and has also met with local residents proximate to the Site to answer any queries. In particular, it emerged that local stakeholders were concerned primarily with the safety of access/egress to the Site and were interested in any community benefit or possibilities of enhancement or provision of additional pedestrian routes outside of the Public Rights of Way. The methods of community engagement and the ways in which public feedback has helped to influence the final scheme are reported in the SCI.

5.0 PLANNING POLICY FRAMEWORK

5.1 Section 70 (2) of the Town and Country Planning Act and Section 38 (6) of the Planning and Compulsory Purchase Act 2004 together require that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.2 The Site is located within the administrative boundary of West Northamptonshire Council which covers the former local authority areas of Daventry, South Northamptonshire and Northampton Borough. The Site is located within the former Daventry administrative boundary.

5.3 For the purposes of this application, the Development Plan comprises:

- The West Northamptonshire Joint Core Strategy Local Plan (Part 1) (Adopted 2014); and
- The Settlements and Countryside Local Plan (Part 2) for Daventry District (Adopted February 2020); and
- Kilsby Neighbourhood Plan 2022-2029 (Adopted 2022).

5.4 The following section identifies the above Local Development Framework (LDF) policies and material considerations relevant to this application. An assessment of the proposed development against the relevant policies is set out in Section 6.0.

5.5 Additional material policy considerations for the proposed Development are derived from global and national energy policy and planning policy as set out in the National Policy Statement (NPS), the National Planning Policy Framework (NPPF) (July 2021), and the online Planning Policy Guidance (PPG) advice on renewable and low carbon energy.

Material Considerations

Kyoto Protocol (2005)

5.6 It is widely accepted that greenhouse gas emissions need to be significantly reduced. In 2005, the Kyoto Protocol came into effect providing the first ever framework for international climate action. Under the Protocol, the United Kingdom, together with 37 other industrialised countries, committed to reducing greenhouse gas emissions by 5.2% from 1990 levels by the year 2012.

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

5.7 The central aim of the Paris Agreement is to strengthen the global response to the threat of climate change by keeping a global temperature rise below 2 degrees and to pursue efforts to limit the temperature increase even further to 1.5 degrees. Additionally, it aims to strengthen the ability of countries to deal with the impacts of climate change. To reach these ambitious goals appropriate financial flows, a new technology framework, and an enhanced capacity building framework will be put in place, thus supporting action by developing countries and the

most vulnerable countries, in line with their own national objectives. The Agreement also provides for enhanced transparency of action and support through a more robust framework.

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

5.8 The Climate Change Act (2008) (2050 Target Amendment) Order 2019[iii] sets a legally binding target for reducing greenhouse gas ('GHG') emissions, in particular carbon dioxide ('CO_2'). As originally enacted, these targets include a reduction of GHG by 100% (on 1990 levels) by 2050 and a requirement that domestic emissions are reduced by no less than 3% each year. In setting these targets, the Act established the Committee for Climate Change ('CCC'), which is responsible for setting interim binding targets over five-year periods.

5.9 In May 2019, the CCC recommend a new emissions target for the UK: a 100% reduction ('net zero') of emissions by 2050. This change in legislation mandating a 100% reduction in CO_2 emissions by 2050 was approved by the House of Commons on 24th June 2019 and the House of Lords on 26th June 2019 and is now the Government's statutory carbon reduction obligation.

5.10 Chapter 6 of CCC's 'Net Zero – The UK's Contribution to stopping global warming'[iv] report refers to delivering a net zero emissions target. It sets out actions, including the transition to a net zero economy and what is needed to underpin net zero delivery. 'Part B' sets out key near-term actions to put the UK on track and recommends that more rapid electrification must be accompanied by greater build rates of low carbon generation capacity, accompanied by measures to enhance the flexibility of the electricity system.

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

5.11 An IPCC Special Report was prepared discussing the potential impacts of global warming of 1.5°C above pre-industrial levels and related global GHG emission pathways in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. The report sets out that pathways limiting global warming to 1.5°C with no or limited overshoot requires rapid and far-reaching transitions in energy, land, and infrastructure, and deep emissions reductions in all sectors. A 'wide portfolio' of mitigation options and a significant upscaling of investments in those mitigation options is needed.

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

5.12 The National Infrastructure Strategy (NIS) sets out the Government's plans to deliver on its ambition, being *'deliver an infrastructure revolution: a radical improvement in the quality of the UK's infrastructure to help level up the country, strengthen the Union, and put the UK on the path to net zero emissions by 2050'*.

5.13 The NIS is relevant to the Development as it sets out how the Government will address the issues we face and how it will build back fairer, faster and greener. The NIS aims to provide

investors with clarity over the Government's plans so they can look at the UK with confidence and help deliver the upgrades and projects needed across the country.

Energy White Paper (December 2020)[vi]

5.14 'The Energy White Paper – Powering our Net Zero Future' (the 'White Paper') was published as a long-term strategic vision for the UK energy system. It establishes the Government's goal of a decisive shift from fossil fuels to clean energy in power, buildings, and industry, whilst creating jobs and growing the economy. The White Paper is clear that: *"Onshore wind and solar will be key building blocks of the future generation mix, along with offshore wind."*

5.15 Renewable energy generation from solar has been identified by the White Paper as a key element of the future energy mix in the UK. It states that the UK needs:

> **"…sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net zero emissions in all demand scenarios."**

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

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

British Energy Security Strategy (April 2022)[viii]

5.17 The British Energy Security Strategy (BESS) sets out how the UK intends to secure clean and affordable energy for the 'long-term'. Realising the strategy requires 70GW of solar generation capacity by 2035. This is a significant increase from the 13.7GW of solar as of February 2022.

5.18 Over the last five-year period until the publishment of the BESS, the UK increased its solar capacity by only an estimated 1.8GW, highlighting the extraordinary need for a significant increase in the deployment of decentralised solar energy schemes of the proposed Development's scale if the BESS targets are to be met. The BESS offers clear support for solar development that is co-located with other functions to maximise the efficiency of land use – this includes dual solar and agricultural land use.

Energy Security Bill (July 2022)[ix]

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

Climate Emergency Declaration (June 2019)

5.20 In June 2019 the United Kingdom (UK) became the first country to declare a climate emergency and legislate long-term climate targets. The resultant legislation amended the Climate Change Act 2008 (c.27) and introduced a legally binding target to achieve 'net zero' by 2050. Paragraph 1 of the Climate Change Act (as amended) sets out the target to 2050 and states that:

> **"it is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline (which means the aggregate amount of net UK emissions of carbon dioxide for that year and net UK emissions of each of the other targeted greenhouse gases for the year that is the base year for that gas)".**

West Northamptonshire Council Net Zero Pledge

5.21 WNC is a signatory to the UK100 Net Zero pledge which provides for the Council and emissions of residents to be net zero by 2045, five years ahead of the statutory net-zero by 2050 goal.

Daventry Climate Emergency

5.22 Daventry District Council declared a climate emergency in February 2020. An Action Plan provides a list of 20 measures agreed by Councillors in order to tackle the issue. This includes overarching targets for emissions reductions, pledges and funding. On joining the new unitary authority DDC has urged WNC to "*take up the mantle*" and show the same leadership in supporting the transition to Net Zero[x].

National Planning Policy

National Planning Policy Framework (NPPF July 2021)

5.23 The NPPF 2021 sets out the Government's planning policies for England and how these should be applied.

5.24 The NPPF emphasises the importance of sustainable development. Paragraph 7 states:

> **'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'**

5.25 Paragraph 8 sets out the three overarching objectives of achieving sustainable development through the planning system:

- **an economic objective** - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- **a social objective** - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- **an environmental objective** - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.26 NPPF paragraph 10 advises that:

> **'So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.'**

5.27 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development, which for decision-taking means the following:

> **'c) approving development proposals that accord with an up-to-date development plan without delay; or**
>
> **d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:**
>
> **i. the application of policies in this Framework that protects areas or assets of particular importance provides a clear reason for refusing the development proposed; or**
>
> **ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'**

5.28 Section 14 Meeting the challenge of climate change, flooding and coastal change, Paragraph 152 states:

> **'The planning system should support the transition to a low carbon future in a changing climate ... It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; … and support renewable and low carbon energy and associated infrastructure.'**

5.29 Section 15 Conserving and enhancing the natural environment, Paragraph 174, states:

> **'Planning policies and decisions should contribute to and enhance the natural and local environment by:**
>
> **a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);**
>
> **b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;…**
>
> **d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;…**
>
> **f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'**

5.30 Paragraph 38 states that local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makes at every level should seek to approve applications for sustainable development where possible.

5.31 Paragraph 55 sets out how LPAs should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations.

5.32 Section 6, 'Building a strong, competitive economy' seeks to support a prosperous rural economy. Paragraph 83 sets out that planning policies should enable the development and diversification of agricultural and other land-based rural businesses.

5.33 Paragraph 120 identifies how planning policies and decisions should encourage multiple benefits from both urban and rural land and take opportunities to achieve net environmental gains such as developments that, amongst other things, would enable new habitat creation.

5.34 Paragraph 158 sets out that, when determining planning applications for renewable and low-carbon development,

> **local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even small scale projects provide a valuable contribution to cutting greenhouse gas emissions; and approve the application it its impacts are (or can be made) acceptable.**

5.35 Paragraph 174 advises that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts and seeking biodiversity net gains.

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

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

5.37 NPS EN–1 was published in July 2011 and sets out the UK Government's commitment to increasing renewable generation capacity. Paragraph 1.2.1 confirms that *"In England and Wales this NPS is likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)".*

5.38 Paragraph 1.7.2 states that energy NPSs should speed up the transition to a low carbon economy and help the UK to realise its climate change commitments. It is also acknowledged that the development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative effects on biodiversity, landscape/visual amenity and cultural heritage, but that it should be possible to mitigate the most significant potential negative effects.

5.39 The three goals of Government policy on energy development are emphasized throughout EN-1. Paragraph 2.2.6 states that *"the UK needs to wean itself off such a high carbon energy mix: to reduce greenhouse gas emissions, and to improve the security, availability and affordability of energy through diversification".* EN-1 clearly sets out the need for new low carbon energy infrastructure to contribute to climate change mitigation.

5.40 At Paragraph 5.9.16, the NPS advises that it is relevant to consider whether any adverse impact on the landscape is temporary and capable of being reversed. For the Cleve Hill Development Consent Order (DCO) (Reference: EN010085), which related to a solar farm with a capacity of around 350 MW the Examining authority concluded that '*…all of the adverse landscape and visual impacts are fully reversible and would be removed on full decommissioning'*.

5.41 In September 2021 a review and consultation on NPS revision was announced and this ran until 29th November 2021. The energy NPS's are being reviewed to:

- reflect the policies and broader strategic approach set out in the white paper
- ensure that we continue to have a planning policy framework which can support the infrastructure required for the transition to net zero

5.42 Draft EN-1 states at Paragraph 1.21:

> **"In England and Wales this NPS may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended). Whether, and to what extent, this NPS is a material consideration will be judged on a case by case basis and will depend upon the extent to which the matters are already covered by applicable planning policy."**

5.43 A summary of some of the most relevant policy provisions of EN-1 are:

- Recognises the UK's target to cut greenhouse gas emissions to net zero by 2050. Paragraph 3.3.20 confirms that there is an urgent need for new electricity generating capacity to meet the UK's energy objectives. Paragraphs 3.3.21 to 3.3.23 identify the role of solar (and wind) in meeting that need.
- The draft NPS states that solar is one of the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply. UK government analysis demonstrates that a secure, reliable, affordable and net zero consistent system in 2050 is likely to be composed predominantly of wind and solar. The draft NPS recognises that this will require sustained growth in the capacity of solar in the next decade.

5.44 Draft NPS for Renewable Energy Infrastructure (EN-3) (September 2021)[xii]:

- At paragraph 2.47.1 draft EN-3 recognises solar farms as one of the most established renewable electricity technologies in the UK, and the cheapest form of electricity generation worldwide. It provides clear support for large scale solar development, stating, '*the government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions'*

5.45 The EN-3 draft contains a section dedicated to solar which details factors that influence site selection by applicants, these are:

- Irradiance and site topography

- Proximity of a site to dwellings
- Capacity of a site
- Grid connection
- Agricultural land classification and land type
- Accessibility

5.46 Matters to be considered in the decision-making process include (at sections 2.49 to 2.54):

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

5.47 It also goes on to state at paragraph 2.48.15 that: '*the development of ground mounted solar arrays is not prohibited on sites of agricultural land classified 1, 2, 3a'* and at paragraph 2.48.13 that: '***land type should not be a predominating factor in determining the suitability of the site location'*** (our emphasis).

Planning Practice Guidance (PPG)

5.48 Planning Practice Guidance (PPG) (launched in March 2014) is a web-based resource, which brings together planning guidance on various topics together. In June 2015, guidance was published on renewable and low-carbon energy. PPG Paragraph 001 (Reference ID: 5-001-20140306) sets out why planning for renewable and low-carbon energy is important. It advises:

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

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

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

- Encouraging the effective use of land by focussing large scale solar parks on previously developed and non-agricultural land, if it is not of high environmental value;
- Where a proposal involves greenfield land, whether
- the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and
- the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays;
- That solar parks are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use;
- The proposal's visual impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety;
- The extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;
- The need for, and impact of, security measures such as lights and fencing;
- Great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large-scale solar parks on such assets. Depending on their scale, design and prominence, a large-scale solar park within the setting of a heritage asset may cause substantial harm to the significance of the asset;
- The potential to mitigate landscape and visual impacts through, for example, screening with native hedges;
- The energy generating potential, which can vary for several reasons including, latitude and aspect.

5.51 Paragraph: 013 goes on to state,

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

Local Planning Policy

5.52 The Local Development Plan (LDP) sets out the policies and proposals for the development and use of land in WNC. The LDP comprises the following:

- The West Northamptonshire Joint Core Strategy Local Plan (Part 1) (2014);
- The Settlements and Countryside Local Plan for Daventry District (Part 2) (2020); and
- Kilsby Neighbourhood Plan 2022-2029 (Adopted 2022).

5.53 WNC is currently preparing an updated Local Development Scheme (LDS) to replace the WNC Joint Core Strategy to guide development to 2050. A timetable for the LDS was agreed on the 28th June 2022 and is at an early stage, with insufficient detail to be examined further.

West Northamptonshire Joint Core Strategy (Part 1)[xiii]

5.54 The West Northamptonshire Joint Core Strategy (JCS) was adopted in December 2014 and provides a spatial framework for the areas covered by the former Daventry District, South Northamptonshire Council and Northampton Borough jurisdictions. The JCS guides development up to 2029 and provides the overall spatial strategy for the area. The JCS states that its role is to identify 'the big picture of "where" and "when"' activity, development and investment is to be located, as well as overarching policies that will apply across the plan area.

5.55 There are a number of spatial objectives of relevance to the Development identified within the JCS. In particular, Objective 1 relates to Climate Change and seeks to:

> '*..minimise demand for resources and mitigate and adapt to climate change, by:*
>
> - *Promoting sustainable design and construction in all new development;*
> - *Ensuring strategic development allocations are located and designed so as to be resilient to future climate change and risk of flooding;*
> - *Encouraging renewable energy production in appropriate locations; and*
> - *Ensuring new development promotes the use of sustainable travel modes*.'

5.56 Objective 9 of the JCS relates to Specialist Business Development and seeks to: '*..support and develop opportunities for specialist employment clusters and business development focused on a low carbon economy*'.

5.57 Objective 13 is also relevant to the Development and relates to Rural Diversification and Employment: '*To support rural diversification and rural employment opportunities, in particular those related to agriculture, horticulture and forestry*.'

5.58 There are also a number of policies which are relevant to the Development, including:

5.59 **Policy SA** – Presumption in Favour of Sustainable Development:

> *'When considering development proposals the relevant council will take a positive approach that reflects the presumption in favour of sustainable development contained in the national planning policy framework. It will always work proactively with applicants jointly to find solutions which mean that proposals for sustainable development will be approved and to secure development that improves the economic, social and environmental conditions in the area.*
>
> *Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in other Local Plans and Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.*
>
> *Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the appropriate council will grant permission unless material considerations indicate otherwise – taking into account whether:*
>
> - *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the national planning policy framework taken as a whole; or*
> - *Specific policies in that framework indicate that development should be restricted.'*

5.60 **Policy S10** -Sustainable Development Principles sets out a series of development principles to be adhered to for all new development, including ensuring that development will be designed to improve environmental performance, energy efficiency and adapt to changes of use and a

changing climate over its lifetime (b) and maximise the generation of its energy needs from decentralised and renewable or low carbon sources (g). Policy S10 also states that development will promote the creation of green infrastructure networks, enhance biodiversity and reduce the fragmentation of habitats (j).

5.61 **Policy S11** relates to Low Carbon and Renewable Energy. The pre-amble to the policy recognises that large-scale renewable energy schemes can have a range of positive or negative effects on nearby communities. Paragraph 5.106 states: "*when considering planning applications for low carbon and renewable energy, an assessment will need to take account of impacts on landscape, townscape, natural, historical and cultural features and areas [sic] and nature conservation interests.'*

5.62 Policy S11 states:

> *'…Major development and sustainable urban extensions should contribute to reductions in carbon emissions and adapt to the effects of climate change through the sustainable development principles (Policy s10), so as to minimise energy using sustainable design and construction, maximise energy efficiency and the provision of low carbon and renewable energy, including where feasible and appropriate, through provision of decentralised energy.*
>
> *Proposals should be sensitively located and designed to minimise potential adverse impacts on people, the natural environment, biodiversity, historic assets and should mitigate pollution. In addition, the location of wind energy proposals should have no significant adverse impact on amenity, landscape character and access and provide for the removal of the facilities and reinstatement at the end of operations…'*

5.63 Other key policies include **Policy BN2** (Biodiversity) which states:

> *'Development that will maintain and enhance existing designations and assets or deliver a net gain in biodiversity will be supported. Development that has the potential to harm sites of ecological importance will be subject to an ecological assessment and required to demonstrate:*
>
> - *the methods used to conserve biodiversity in its design and construction and operation*
> - *how habitat conservation, enhancement and creation can be achieved through linking habitats*
> - *how designated sites, protected species and priority habitats will be safeguarded development management decisions will reflect the hierarchy of biodiversity and geodiversity designations attaching appropriate weight to the status of the site which would be affected.*
>
> *In cases where it can be shown that there is no reasonable alternative to development that is likely to prejudice the integrity of an existing wildlife site or protected habitat appropriate mitigation measures including compensation will be expected in proportion to the asset that will be lost. Where mitigation or compensation cannot be agreed with the relevant authority development will not be permitted.'*

5.64 **Policy BN5** makes provisions relating to the Historic Environment and Landscape, stating:

> *'Designated and non-designated heritage assets and their settings and landscapes will be conserved and enhanced in recognition of their individual and cumulative significance and contribution to West Northamptonshire's local distinctiveness and sense of place. In environments where valued heritage assets are at risk, the asset and its setting will be appropriately conserved and managed.*
>
> *In order to secure and enhance the significance of the area's heritage assets and their settings and landscapes, development in areas of landscape sensitivity and/ or known historic or heritage significance will be required to:*

1. Sustain and enhance the heritage and landscape features which contribute to the character of the area including:

a) conservation areas;

b) significant historic landscapes including historic parkland, battlefields and ridge and furrow;

c) the skyline and landscape settings of towns and villages;

d) sites of known or potential heritage or historic significance;

e) locally and nationally important buildings, structures and monuments

2. Demonstrate an appreciation and understanding of the impact of development on surrounding heritage assets and their setting in order to minimise harm to these assets; where loss of historic features or archaeological remains is unavoidable and justified, provision should be made for recording and the production of a suitable archive and report

3. Be sympathetic to locally distinctive landscape features, design styles and materials in order to contribute to a sense of place

The retention and sensitive re-use of disused or underused heritage assets and structures is encouraged in order to retain and reflect the distinctiveness of the environment, contribute to the sense of place and promote the sustainable and prudent use of natural resources. Proposals to sustain and enhance the area's understanding of heritage assets, for tourism and historic interest as part of cultural, leisure and green networks will be supported.'

5.65 **Policy BN7** Local Flood Risk Management provides protection from flood risk and sets out requirements for new development proposals. This includes that all new development will be required to demonstrate that there is no increased risk of flooding to existing properties and that any 'major' development should be accompanied by a Flood Risk Assessment.

5.66 Other relevant policy includes **Policy R2 Rural Economy** which states that:

`*proposals which sustain and enhance the rural economy by creating or safeguarding jobs and businesses will be supported where they are of an appropriate scale for their location, respect the environmental quality and character of the rural area and protect the best and most versatile agricultural land.'*

Settlements and Countryside Local Plan for the former Daventry District (Part 2) 2011-2029[xiv]

5.67 The Settlements and Countryside Local Plan (Part 2) (LP Part 2) covers the former Daventry District within the tiered LDF, sitting alongside the West Northamptonshire JCS. The LP Part 2 provides more detailed policy guidance to the spatial framework for the JCS.

5.68 The LP Part 2 is supportive of renewable energy development which is provided for within **Policy ENV9** (Renewable Energy and Low Carbon Development, our emphasis):

'A. Proposals for renewable energy development will be supported where, with appropriate mitigation, they do not have an adverse impact on any of the following:

i. Form, character and setting of an existing settlement;

ii. Heritage assets and in particular on views important to their setting;

iii. Biodiversity and ecology;

iv. The landscape including the cumulative impact with existing or approved renewable energy development;

v. Residential amenity; and

vi. The enjoyment of the open countryside including public rights of way. …

5.69 **Policy ENV1** (Landscape) states:

'A. The Council will support proposals that maintain the distinctive character and quality of the District's landscapes, as defined in the Daventry District Landscape Character Assessment 2017. In doing so, it will take into consideration the cumulative impact of development proposals on the quality of the landscape.

B. Where appropriate, applicants will be expected to demonstrate that their proposal:

- *i. Respects the local distinctiveness and historic character of the particular landscape character area in which it is located; and*
- *ii. Respects existing patterns of development and distinctive features that make a positive contribution to the character, history or setting of a settlement or area such as key buildings, village skylines and ridgelines; and*
- *iii. Avoids creating hard developed edges to the open countryside; and*
- *iv. Avoids physical and visual coalescence between settlements; and*
- *v. Enhances and restores landscape features where the opportunity arises; and*
- *vi. Incorporates mitigation measures to integrate development into its surroundings and enhance or restore the local landscape.*

C. Development proposals should include, where appropriate to their scale, use and location, an assessment of the likely visual impacts on the local landscape and the site's immediate and wider setting. This will include the landscape capacity of the site's immediate and wider setting to accommodate the development in accordance with the Daventry District Landscape Character Assessment and the Council's Landscape Assessment Toolkit. Applications for major developments and where the Council identifies that a proposal would have an adverse impact on the landscape, may require a full landscape and visual impact assessment, which should be submitted as part of the planning application.

D. Proposals that would cause landscape harm will be required to demonstrate that the harm can be successfully mitigated through an appropriate landscape treatment in keeping with the landscape character area.

E. Provision should be made for the long term management and maintenance (minimum of five years) of new landscape proposals to ensure their establishment. …

5.70 **Policy ENV4** provides policy relating to Green Infrastructure:

The Council will protect, enhance and restore the District's green infrastructure assets in order to create a comprehensive network that contributes to the full range of ecosystem services including quality of life, biodiversity, sustainable transport and climate change mitigation by:

- *i. Working with partners, including neighbouring authorities and the Local Nature Partnership, to plan for green infrastructure at a landscape scale. In particular proposals will be supported that would contribute to the aims and objectives of the Nene Valley Nature Improvement Area project on habitat restoration, creation and connectivity;*
- *ii. Supporting proposals that protect, enhance and restore the existing green infrastructure network of sub-regional and local corridors identified in the WNJCS. Proposals will be expected to demonstrate how they would achieve this and in the case of new green infrastructure, how they would link into the existing networks;*
- *iii. Strategic development sites should be masterplanned as a whole to show the location of new on-site strategic green infrastructure and how it relates to the wider network. Proposals should not lead to fragmentation of a green infrastructure link;*
- *iv. Supporting proposals that avoid fragmentation of green links and that would reconnect existing gaps in provision;*
- *v. Supporting proposals that protect, connect and extend the local green links and network of green infrastructure within and around Daventry town and that limit any loss to that necessary to accommodate infrastructure improvements required to deliver allocated sites, subject to such loss being mitigated to achieve a net enhancement in green infrastructure provision; and*
- *vi. Supporting the recognition of important green infrastructure including designation within neighbourhood development plans.*

5.71 **Policy ENV5** outlines policy considerations with respect to Biodiversity:

> *'A. The Council will support proposals that conserve and enhance designated and undesignated sites and species of national and local importance for biodiversity and geodiversity and contribute towards a resilient ecological network. The level of protection should be proportionate to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below: …*
>
> > *Sites of local importance*
> >
> > *Development affecting sites of local importance for biodiversity and geodiversity including Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) and Local Geological Sites (LGeS), will be expected to avoid causing adverse effects unless it can be demonstrated that the benefits of development outweigh the harm and where measures to mitigate the harm can be put in place. Development that would result in the loss or deterioration of such sites or habitats that are irreplaceable will not be supported unless the need for and benefits of the development in that location clearly outweigh the loss.*
> >
> > *Undesignated sites*
> >
> > *Development affecting sites that are not formally designated but which make a positive contribution to biodiversity will be required to take into account their current or potential role in the District's wider biodiversity network.*
>
> *B. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment and include details of mitigation or compensation, where harm will be caused. The level of detail of the assessment will be proportionate to the significance of the asset and the scale of the proposal. If significant harm cannot firstly be avoided, adequately mitigated or as a last resort, compensated for, or should a proposal lead to the loss or deterioration of irreplaceable habitats, then development will not be permitted.*
>
> *C. Proposals should seek to achieve a net gain for biodiversity, including the creation and management of new habitats, strengthening existing networks of habitats, avoiding the fragmentation of habitats and links and addressing the Northamptonshire Biodiversity Action Plan local priorities for habitats and species.*
>
> *D. Proposals should comply with the principles set out in the Biodiversity Supplementary Planning Document for Daventry District to ensure that biodiversity and the impact of development on biodiversity is given appropriate consideration'.*

5.72 **Policy ENV7** provides protection for the Historic Environment, providing that '*any harm to a designated heritage asset requires clear and convincing justification'*. ENV7 also states that great weight should be given to the conservation of heritage assets, irrespective of the level of harm.

5.73 **Policy ENV10 Design** requires that development is of high quality and incorporates crime prevention measures in the site layout and building design. ENV10 also requires development to integrate existing landscape features of a site with proposed new landscaping and open space.

5.74 **Policy ENV11 Local Flood Risk Management** states that: '*In order to manage flood risk and protect and where appropriate improve the quality of the water environment, development in Daventry District will be expected to comply with: The Northamptonshire Local Flood Risk Management Strategy; The Local Standards and Guidance for Surface Water Drainage in Northamptonshire and Anglian Water's Surface Water Drainage Policy'.*

5.75 **Policy ST1 Sustainable Transport Infrastructure** requires that where practical, proposals should incorporate appropriate infrastructure to support electric vehicle charging.

Kilsby Neighbourhood Development Plan 2022-2029 (Adopted 2022)[xv]

5.76 The Kilsby Neighbourhood Development Plan (NDP) was originally made in July 2016 and was subsequently reviewed with modifications made in 2021, resulting in a Modified NDP being adopted in June 2022. The Site falls within the Kilsby NDP plan area and the relevant NDP policies are summarised below.

5.77 **Policy K3 (Design of New Development)** – requires that proposals:

i. *'protect the natural environment and mitigate against any loss of biodiversity';*
ii. *'Demonstrate that they are responding to climate change…' ;*
iii. *Consider and minimise any impacts on views in accordance with Code 2 – Landscape, Views and the Settlement Edge'.*

5.78 Relevant excerpts of **Policy K5 (Built Heritage)** include that: '*Development proposals must conserve designated and non-designated heritage assets and their settings in a manner appropriate to their significance.'*

5.79 **Policy K6 (Character, Form and Setting)** advises, '*Development outside the existing confines of Kilsby Village, should be appropriate to the open countryside and seek to sustain the character and setting of the village and local landscape, including any areas of archaeological significance.'*

Crick Village Neighbourhood Development Plan 2018-2029[xvi]

5.80 The Site is located adjacent to the Crick NDP area and therefore it is proportionately considered here. The Crick Village NDP was Adopted in January 2018 and Reviewed in December 2021.

5.81 The Crick Village NDP at Paragraph 101 states that '*further renewable energy developments should not be considered if they are to the detriment of valuable agricultural land or scar the village character'.*

Supplementary Planning Documents

5.82 There are several Supplementary Planning Documents (SPDs) relevant to the Development. These include:

- The **Energy and Development SPD** (2007[xvii]) which provides an overview of energy efficiency measures as well as renewable energy systems. The SPD also provides for general planning considerations with the siting of new development, including that renewable energy development should not be located in flood risk areas, should respect landscape character and provide a net gain in habitats and/or species.
- The **Biodiversity SPD** (2017)[xviii] is also of relevance to the Development and provides a framework for the consideration of biological assets throughout the development process.

6.0 PLANNING ASSESSMENT

6.1 This section provides a planning assessment that goes beyond policy review commentary. It discusses the principle of development, topic-specific considerations, and provides a robust case for why and how the scheme represents a form of sustainable development.

6.2 The proposed solar PV installation at Land North and South of Kilsby Road has been informed by a series of technical assessments and through consultation with Council Officers, Parish Council members and the local community. The findings of the assessments undertaken are presented in the relevant technical reports as listed in Table 1.1.

6.3 To demonstrate how the proposals respond to these matters, this section of the Statement sets out the key topics arising from this informative work and in doing so, demonstrates the compliance of the application with the relevant planning policy context.

6.4 This section contains a detailed analysis of the Development against the identified relevant national and local planning policies and other material planning considerations. Key issues for the determination of the application that are assessed in this section are as follows:

- The Principle of Development as Renewable Energy;
- Landscape and Visual Impacts;
- Heritage Impacts;
- Ecology and Biodiversity Impacts;
- Use of Agricultural Land;
- Impacts on Environmental Health and Amenity;
- Flood Risk & Drainage;
- Transport Impacts and Access; and
- The Development as Sustainable Development

The Principle of the Development as Renewable Energy

6.5 The Development is a solar energy generating station supplying up to 49.9MW to the local grid. The Glossary of the NPPF defines renewable energy as those energy flows that occur naturally and repeatedly in the environment, including from the sun. The Development, therefore, meets the definition of renewable energy as defined in national planning policy.

6.6 National policy is strongly supportive of renewable energy as a means of meeting our increasing energy demands, tackling climate change, addressing supply security, and transitioning to a sustainable low-carbon economy. Privately funded, large-scale solar developments such as this are recognised as being not just necessary but central to meeting an urgent need.

6.7 There is no requirement within national or local policy to demonstrate the need for renewable energy. The urgency of the need for substantially greater quantities of renewable energy (including large-scale solar) is self-evident given the dramatic step change in Government energy policy driven by its declared Climate Emergency to achieve a 100% reduction in greenhouse gas emissions by 2050 (Net Zero). This is a legally binding target.

6.8 UK energy policy acknowledges renewable energy developments as key to the net-zero target. The NIS states that to achieve Net Zero 2050, the power system must be carbon-free and significantly larger to cope with additional demand. As discussed in PS Section 4.0, solar is seen by the UK Government as one of the building blocks of the country's low-cost, net zero consistent generation mix, with a further 64GW of solar required by 2035.

6.9 It is also clear that decentralised renewables contribute to national energy security. This is particularly acute set against a BESS which identifies that accelerating the transition away from oil and gas depends critically on how quickly large-scale renewables can be deployed.

6.10 Daventry District declared a climate emergency in February 2020, whilst WNC is a signatory to the UK100 Net Zero Pledge which provides for the Authority as a whole to achieve net zero by 2045. This is in advance of the statutory net-zero by 2050 legally binding target.

6.11 The WNC LDF is aligned with the NPPF's (Paragraph 11) presumption in favour of sustainable development which is defined as '*meeting the needs of the present without compromising the ability of future generations to meet their own needs'* (Paragraph 7). NPPF Paragraph 148 states that the planning system should support the transition to a low-carbon future and support renewable and low-carbon energy and associated infrastructure. Paragraph 154 goes on to state that when determining planning applications for renewable and low carbon development, LPAs should "*not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions*" and "*approve the application if its impacts are (or can be made) acceptable*".

6.12 The Part 1 Local Plan provides the spatial objectives for WNC, including Objective 1 which seeks to '*encourage renewable energy production in appropriate locations'*. Policy SA (Presumption in Favour of Sustainable Development) also notes that the relevant council will '*take a positive approach that reflects the presumption in favour of sustainable development*'.

6.13 The Development's contribution of 49.9MW of clean renewable electricity is significant in meeting both national and local renewable energy targets. It is a significant environmental benefit, meeting the electrical needs of approximately 14,194 homes. This provides a CO_2 displacement of 35,207 tonnes compared to the same energy from fossil fuel sources. This is being provided at a time of Climate Emergency.

6.14 Moreover, the Development would feed energy into the local DNO grid (as opposed to the National Grid transmission network) which means it would provide clean electricity directly to the immediate locality. This therefore directly contributes to WNC energy security and climate change targets, whilst also helping to reduce national emissions. The Development will be delivering quantifiable benefits at a local level, and offsetting emissions associated with centralised power from plants that rely on fossil fuels.

6.15 Demand for electricity will only increase as gas and oil heating is phased out and electric vehicles replace petrol/diesel fuel. However, these transitions will only support CO_2 emissions displacement if there are secure local sources of clean energy to meet demand. It will not be sufficient to rely on the Government's plan to decarbonise the grid when this plan is reliant on decentralised energy schemes like the Development to achieve statutory national targets and therefore realise the WNC Local Plan commitments.

6.16 Assessments accompanying the Application demonstrate that the Development, as mitigated, would not significantly adversely affect landscape designations, biodiversity (in fact a significant biodiversity net gain of 77% for Habitats and 127% for Hedgerows would be delivered) or the historic environment. Impacts on landscape character and heritage assets are carefully considered and the scheme is designed to avoid or minimise impact. Safe construction and operational access are provided and undue impact on local road network users is avoided. Public amenity and environmental health are protected from noise and glint and glare impacts. Soil health would be improved as a result of the temporary development that will not cause the permanent loss of agricultural land. The ALC confirms the site as predominantly Grade 3b, and therefore not categorised as BMV agricultural land, and grazing within the solar farm will maintain the current agricultural use. In applying the relevant national and local policy regarding the principle of the development as renewable energy, the Development is fully compliant, and the 'in principle' acceptability of the Development is considered to be established.

Landscape and Visual Impact

6.17 The NPPF (Paragraph 130), WNC (Part 1) JCS Policy BN5, Settlements and Countryside (Part 2) Policy ENV1, ENV2 and ENV9, as well as the Kilsby NDP Policy K6 explicitly require the protection and/or enhancement of the landscape and visual quality of the area. These policies have been relied upon to inform the layout and design of the Development and its integration into the landscape.

6.18 The DAS, SCI and LVIA outline how the Development has responded directly to the landscape setting of the Site, formal Pre-Application Advice, and community feedback relevant to landscape and visual impacts. This includes:

- Sensitive siting of panels and ancillary buildings;
- Retention and protection of trees and hedgerows within and around the Site, with development confined to individual field parcels to ensure it is well integrated into the landscape and benefits from existing screening.
- Protection and enhancement of PRoW(Footpath EW2) and the provision of a new permissive path to ensure continued interconnectivity between villages and opportunities for outdoor recreation.
- New planting along boundaries to filter, screen, and help integrate the Development into its landscape context. It is proposed all boundaries along the Site's perimeter are enhanced where necessary, using native species appropriate to the Site and the surrounding area.
- Consideration of the internal access track network to limit the number of field boundary crossings. Where crossings are necessary, they have been carefully aligned to existing access points to avoid impacting hedgerows and trees;
- Improved biodiversity across the Site through the creation of a variety of new habitats and management of existing habitats within the Site to improve their quality and functioning.
- Amendments to the red line boundary to remove parcels of land which were identified as likely to have landscape impacts, as outlined in the DAS.

6.19 The DAS and LVIA show that great care has been taken in designing a high-quality scheme that secures multifunctional social and environmental gains. The objective of the Landscape Strategy is to integrate the Development into its surroundings, minimise any potential negative effects and enhance the landscape character, amenity value and biodiversity.

6.20 The likely landscape and visual impacts of the Development have been fully assessed in the LVIA. This is summarised below:

- The Site and the surrounding area do not lie within a designated landscape area. The overall character of the site is defined by flat to very gently undulating pastoral and arable farmland, with strong field-boundary vegetation and occasional woodlands and tree belts. Transport infrastructure is prominent, and in some places dominant, in the landscape – including the M1/M45 interchange, A5, West Coast Mainline Railway, and Grand Union Canal. Power lines cross the Site and there are large wind turbines to the north (adjacent to the DIFRT). There are also very few residential properties with views of the Site.
- The Site is partially contained by strong vegetation along the eastern and much of the southern boundaries, while consecutive layers of field and infrastructure boundary vegetation in the wider surrounding landscape restricts visibility towards the Site.
- During the operation of the solar farm, the present predominantly pastoral land use would change to a solar farm development, albeit set within a significantly improved ecological environment. The majority of landscape and visual effects would arise within the close landscape setting of the Site up to approximately 0.5km to 1km in distance.
- The LVIA identifies potentially sensitive receptors which may experience effects with regard to landscape. These range from negligible to moderate adverse effects after the implementation of landscape mitigation.
- Landscape fabric and character are likely to be major to moderate adverse however the landscape mitigation proposed would improve the integration of the Development into the landscape and further reduce the impact on views in the medium term.
- Users of the PRoW (Footpath EW2) through the Site are likely to experience major adverse effects as users of the footpath would have views of the solar farm.
- Residents of Kilsby Grange are likely to experience a moderate adverse effect after the implementation of the Landscape Strategy Plan.

- Users of the A5 road network are likely to experience a negligible effect upon maturation and implementation of the proposed new roadside hedgerow to the west of the Site.

6.21 The LVIA concludes that whilst some effects may occur within the immediate vicinity of the Site, there is capacity within the landscape to accommodate the Development without causing landscape or visual harm to the wider surrounding area. The landscape and visual effects as assessed would be limited in scale and extent and some effects would reduce over time as the proposed mitigation planting matures. The effects would be wholly reversible with the removal of the Development.

6.22 In view of the above findings, it is considered that the Development would therefore accord with the relevant provisions of the NPPF, WNC (Part 1) JCS Policy BN5, Settlements and Countryside (Part 2) Policy ENV1, ENV2 and ENV9, and the Kilsby NDP Policy K5 & K6.

Cultural Heritage Impact

6.23 The HDBA considers the potential impacts of the Development upon above and below-ground heritage assets, and the potential impacts on the setting of heritage assets within the wider landscape. A desk-based study, site visits and geophysical survey have been undertaken in order to identify assets that may be affected by the Development and to establish their current condition and baseline setting.

6.24 There are no designated heritage assets within any part of the Site. There are several known non-designated heritage assets within or adjacent to the Site, including an unscheduled portion of the Watling Street Roman Road Scheduled Ancient Monument (along the eastern edge of the Site, with the scheduled section of this asset approximately 50m to the north-east of the Site) and areas of surviving ridge and furrow (discussed below).

6.25 There are five designated heritage assets within a 1km radius of the Site. This includes the Grade II Listed Canal Tunnel and associated Ventilation Shafts of the Grand Union Canal. Due to the topography and tree cover, the Site is not visible from any of these heritage assets and therefore the settings of these assets will not be directly affected by the Development. Therefore, with respect to built heritage, the Development is considered to accord with Policy BN5 of the JCS, Policy ENV7 of the DDC Part 2 Local Plan, and Policy K5 of the Kilsby NDP.

Archaeology

6.26 The construction of a solar farm has the potential to disturb, damage or remove archaeological remains. The HDBA found potential for buried archaeological remains owing to the geological context of the Site. Whilst it is anticipated that the physical impact upon any underlying archaeological remains is low due to the limited below-ground impact of solar farm

development, the assessment does conclude that there is potential for Iron Age and/or Roman archaeology to be located within the Site. This is discussed in detail within the HDBA.

6.27 An assessment by a CIfA accredited archaeologist has included examination of historical aerial photographs and LiDAR data, along with the results of the Geophysical Survey. Consideration of survey results has identified features of potential archaeological interest. This includes Sections of Watling Street Roman Road and areas of ridge and furrow. The assessment identifies that there is low potential for previously unknown remains to be present within the Site for most prehistoric eras (Palaeolithic, Mesolithic and Neolithic) as well as medieval, post-medieval and modern dates. It is considered that there is a medium potential for Bronze Age Remains. The Site's relationship with Watling Street Roman Road and previous artefact finds suggest there is a high potential for Iron Age and/or Roman remains within three possible enclosures identified in the Geophysical Survey.

6.28 The layout of the Development has been designed to avoid siting features with the most ground-intrusive impact (substation, ancillary buildings and the temporary construction compound) over areas of known heritage assets or high archaeological potential. Where panels are proposed over areas of high archaeological potential, impacts can be avoided through either exclusion of areas or non-intrusive (no-dig) construction methods.

6.29 Formal Pre-Application Consultation is ongoing with WNC's Archaeological Advisor to agree the need and scope of any mitigation. Any phased mitigation would be secured by condition and include targeted trial trenching in the three areas of high archaeological potential. A review of the results of the trial trenching would be used to refine and define areas requiring mitigation, setting out details of no-dig construction methods and/or areas where exclusion is necessary.

6.30 This provides reassurance that the Development can be delivered without risk of harm to such assets. Historic England *Advice Note 15: Commercial renewable energy development and the historic environment* (February 2021) confirms that in the event of archaeological interests being recorded there are opportunities to mitigate potential impacts through, for example, '*the use of concrete bases for the panels which entail less disturbance'.*

6.31 The results of pre-commencement fieldwork ground investigations could have several outcomes, none of which would require the refusal of planning permission on heritage grounds:

- If no archaeological finds are uncovered, the development can be implemented as proposed;
- If archaeological finds are revealed, they can be recovered and reported such that the development can be implemented as proposed; or,
- If archaeological finds are of a nature where either as proposed implementation or recovery could compromise the assets, there are solutions including either exclusion zones (removing any/all development) and/or an alternative ground-mounted system on ballasts in any areas where pile-driven mounting framework posts could pose risk.

6.32 The limited ground disturbance as a result of the construction and decommissioning of the solar farm means that even without additional mitigation measures, the Development would result in very low risk of harm to the significance of heritage assets. Indeed, outside of the three areas of high archaeological potential, there are unlikely to be extensive archaeological remains of more than local importance.

6.33 Overall, the assessments undertaken have not identified anything in respect of archaeology or above-ground heritage interests that would preclude the Development. The identified 'less than substantial' harm to heritage assets means that the Development should be considered against the balancing process identified in NPPF Paragraph 202, which states:

> *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal….'*

6.34 The environmental and social benefits of the Development are substantialweight in the planning balance. As such it is concluded that the Development complies with the policies of the NPPF including those at paragraphs 189, 193 and 194-197, Policy BN5 of the JCS, Policy ENV 7 of the Daventry Part 2 Local Plan and Policy K5 of the Kilsby NDP.

Ecology and Biodiversity Impacts

6.35 Both national and local policy place great importance on the protection and enhancement of biodiversity, including achieving biodiversity and GI gains when mitigating impacts of development. Nationally and locally important conservation sites should be protected, along with protected species unless the benefits of the development outweigh the harm.

6.36 The likely effects of the Development on nature conservation and biodiversity have been fully assessed in the Ecological Impact Assessment (EcIA) accompanying this application. Environmental assessments have included a desk study, extended Phase 1 Habitat Survey (PEA), and species-specific surveys for Great Crested Newts (GCN), Badgers, and Breeding Birds. A BNG Assessment is also provided.

6.37 The Site is predominantly intensively grazed pastoral fields with one arable field at the north of Parcel A. Fields are largely bounded by species-rich and species-poor hedgerows. There are many large standard ash trees displaying signs of dieback and there are small areas of woodland and several ponds close to the Site boundary. Features of the greatest ecological value will be retained, protected and enhanced where relevant as part of the Development.

6.38 Species-specific surveys found that GCN are present in one of the on-site ponds to the middle-west of Parcel A. To avoid impacts on GCN a 50m buffer is provided between the pond and the solar farm fence. Ponds with GCN were also identified in a field adjoining the most northern field of Parcel A. Works within 50m of th ponds will be timed to occur during the hibernation

season or will be carried out under a District Level Licence if not excluded from the 50m buffer zone in the final design.

6.39 Surveys also found that areas of the Site, in particular dead trees, were a likely habitat for large numbers of starlings. These trees will be retained where possible and if any works to them are required, this will be accompanied by an ecological survey. Starling boxes will be provided for at least the 6 trees already felled at the time of the PEA. Enhancements will also be made via the installation of bat boxes and an additional 10 bird boxes to support further species. The EcIA identifies that there may be a loss of two skylark nesting sites associated with the development of the solar farm. This will lead to some adverse impacts, however, the sowing of a diverse grassland within the field will enhance the habitat for surrounding pairs as it will offer an important foraging resource, particularly to find invertebrates to feed to young. A summary list of measures for wildlife and habitat enhancement is at Section 3.0 of this PS.

6.40 Supporting the Application is an Arboricultural Impact Assessment (AIA) which includes a Tree Constraints and Protection Plan. The principles in BS5837:2012 were used to fully assess the impact on trees and other woody vegetation. This has informed the design and layout to ensure no loss or risk of harm to trees in association with the Development.

6.41 A description of the potential effects of the proposed solar farm on the habitats and species identified as being present are described in the EcIA. Measures to protect and enhance the site are also provided therein, along with a recommendation for these measures to be set out in a detailed CEMP to be provided pre-commencement. This CEMP would be informed by a further ecological walkover assessment to account for any changes and would ensure the measures would be appropriate for the intended construction timeframe based on up-to-date Site conditions as assessed by a qualified ecologist.

6.42 The AIA provides similar CEMP recommendations, some of which are already designed-in to the Development such as exclusion or appropriate mitigation for Root Protection Zones (RPZ). The pre-commencement CEMP would also be informed by a walkover by a qualified arboriculturist to ensure implementation based on an up-to-date assessment of tree conditions on the Site.

6.43 A full LEMP is not submitted with this application because such a document will be more accurate and detailed if based on up-to-date pre-construction conditions and final detailed plans following technical assessments and the procurement exercise that will inform the exact details of the materials and layout of the Development.

6.44 LEMP requirements can also vary depending on the time of year of commencement and completion. And, it is known that aspects of the scheme could change due to other inputs of the planning application process such that a LEMP submitted now may not be fit for purpose

at determination. Furthermore, aspects of a robust LEMP, such as details of the management structure and reporting mechanisms will not be available until the pre-commencement phase.

6.45 For the purpose of this application, the EcIA sets out all of the measures that would feature in an outline LEMP at this stage in the development process. The Applicant expects a LEMP condition to complement a condition requiring a final pre-commencement Planting and Enhancements Plan detailing species, exact locations, sizes, etc. as well other measures like locations of bird nesting boxes and log piles. The LEMP will then set out a plan for holistic site and environmental management in the operational phase. This will include but is not limited to mechanisms to secure BNG and regular reporting-in on delivery.

6.46 The BNG assessment calculates that the creation and enhancement measures proposed would deliver 77% habitat net gain and 127% net gain in hedgerow units.

6.47 This is a significant contribution to Kilsby and Crick NDP and WNC green infrastructure and biodiversity objectives and is a major beneficial residual effect. These provisions, and assurance of construction-stage protections, can be secured through the imposition of an appropriately worded planning condition in the event permission is granted. By adhering to the recommended objectives, implementation provision and monitoring set out in the EcIA and AIA, the Development will accord with the relevant NPPF (paras 174 and 179), WNC JCS Policy BN2, DDC Local Plan Part 2 Policy ENV4 & ENV5, and Kilsby NDP Policy K3.

Use of Agricultural Land

6.48 NPPF (para 174) seeks to prevent the loss of best and most versatile land, defined as Grades 1, 2 and 3a in the MAFF 1988 guidance for grading the quality of agricultural land.

6.49 Policy requires the proposed use of any agricultural land to be necessary and for poorer quality land to be used in preference to higher quality land. An assessment of agricultural land quality was undertaken to determine agricultural land quality. This confirmed the Site to be mostly Grade 3b (32ha; 58% of the Site) with isolated patches of Grade 2 (7ha; 13% of the Site) and Grade 3a (15.7ha; 28.5% of the Site).

6.50 This grading is considered typical for the wider geographical area. Provisional ALC Data identifies that Northamptonshire County as a whole comprises c. 8.4% Grade 2 and 81.5 Grade 3 (undistinguished between Grade 3a and 3b). In particular, MAFF provisional (Pre-1988) ALC Information indicates that Daventry District has a higher proportion of agricultural land in Grade 3 (90.7% compared with 48.2% of England as a whole).

6.51 The areas of Grade 2 and 3a land are not contiguous or contained within individualised fields for productive use. Instead, the BMV land at the Site is contained within wider areas of 3b.

Therefore, although the soil quality in itself would classify isolated areas as BMV, the way these areas are located means they cannot be farmed independently from the grade 3b land, and therefore do not make any positive contribution to the farm output in a way that is different to or better than the contribution of the lower quality 3b land.

6.52 It is also the case that all of the Site other than the most northern field of Parcel A has been solely in pastoral use for at least the last 30 years, if not longer. The majority of the Site's BMV land is therefore used for grazing such that the BMV classification is of no real relevance to its use. The most northern field of Parcel A is the only arable field within the Site and is not in the same ownership or part of the same holding as the remainder of the Site so is one field of a larger independent arable enterprise. This field is 10.7 ha (19.48% of the Site). Although it does include a corner of Grade 2 BMV land, this is 1.1 ha of the 10.7 ha field, the remainder of which has much lower quality Grade 3b soils. Therefore BMV represents only 10.1% of land within the only arable field and the Site as a whole includes only 2% of BMV land in arable production. Given that this is such a small proportion of the northern field, the presence of BMV land is of no material difference to the versatility of agricultural production because the baseline for what can be grown is the 90% lower quality 3b soil.

6.53 Furthermore, the Development does not involve the irreversible loss of any land available for agriculture, either temporarily or permanently. The solar farm is wholly reversible, unlike other forms of development on agricultural land such as residential or industrial uses. The Development will not change the classification of the land from agricultural during the lifetime of the generating station and co-located agricultural use is intended.

6.54 The agricultural land at the Site is predominantly in intensive pastoral use while crops in the most northern field are not grown for the human food supply chain. In many respects, the organic management of the land under and around solar arrays as species-rich grassland will be a benefit to soil health and future agricultural land quality. It is likely that soil health will be improved over the operational life of the generating station, i.e. increase in soil organic matter, increase in the diversity of soil flora, fauna and microbes, and improved soil structure.

6.55 The use of agricultural land is necessary in this case as the location of the Development is driven first and foremost by its requirement to be close to a feasible grid POC, the availability of which has been secured under agreement with the DNO. The Applicant has signed a Connection Agreement with WPD (now National Grid) allowing for full export of the power of the Development with the POC connecting to the pylon and 132kV line crossing the Site.

6.56 The Applicant has searched for suitable and available sites within an appropriate study area, recognising that the viability of any energy project reduces the further away it gets from the POC. This is not merely a matter of construction/development costs, which can be prohibitive

with increased distance. It is also the case that the further a site is from a POC, the more energy is lost in transmission.

6.57 It will almost always be the case that solar farms of a sufficient scale to support a transition to Net Zero will require the temporary use of greenfield agricultural land; the use of brownfield land to meet permanent housing or employment needs is the much more sustainable option given the reversibility of a solar farm. However, if agricultural land is to be allowed a temporary use for direct energy production (as opposed to indirect such as growing biofuel crops), on the basis that this is necessary in the face of climate change, it is not an efficient use of land to locate solar farms in a location where clean energy is lost in transmission instead of locating close to a POC that is able to distribute to local users.

6.58 The Site will be a multifunctional scheme with ecosystem services benefits for the rural economy and the farm's agricultural interests. The use of agricultural land is necessary and the Development would not undermine national agricultural interests in accordance with NPPF paragraph 174 or local agricultural and rural economy interests. It also presents an appropriate form of farm diversification in accordance with Policy S11 of the WNC Part 1 Plan and the objectives of the Part 1 Plan.

Current Use and Rural Diversification

6.59 There is national and local policy support in NPPF paragraph 84 (b) for rural diversification that meets sustainable development objectives, helps sustain the rural economy, and encourages agricultural enterprise. This is subject to proposals being well designed and of use and scale appropriate to the location when considering landscape, heritage, and environmental impacts and acceptable access and highways impacts.

6.60 Due to the relatively low income from farming, many farmers have had to diversify to secure an economically sustainable profit. Farm diversification is broadly defined as *"the entrepreneurial use of farm resources for a non-agricultural purpose for commercial gain".* Hence, diversification reflects the reduced dependence of farmers on agriculture as a source of income. Diversification also implies entrepreneurial activity on behalf of the farmer.

6.61 The Site does not cover the entire land holding and in combination with the ecological benefits delivered on the Site, the opportunity remains for continued agricultural practice and/or enrolment with any relevant Countryside Stewardship schemes or similar programmes.

6.62 The Site is currently predominantly in use for sheep/cattle grazing and the only arable field is not currently used for the production of food directly for human consumption. There is no anticipated reduction in food supply owing to temporarily removing these fields from intensive arable production. Indeed, the intention is to diversify the farm practices without disrupting

the current grazing use, thus giving the Site a dual use for both the traditional farming sector and the production of "homegrown" electricity.

6.63 The solar farm is a temporary farm diversification strategy that entails no permanent nor temporary cessation of agricultural use beyond the short-term construction period. Although the Site will remain in co-located agricultural grazing use, it will also provide a guaranteed income to the farms at a precarious time for UK agriculture when the adverse impacts of climate change, such as an increase in extreme weather events, puts smaller family farms at particular risk.

6.64 The Development will be an important stream of diversification income whilst underpinning the continuation of the overall farming enterprise. Farm businesses play a vital role in the rural economy, particularly supporting the agricultural supply chain to include feed merchants, machinery sales, maintenance and repair businesses, delivery drivers and professional services, to name but a few. The Development would help to support the local rural supply chain by making the farm more economically and operationally resilient.

6.65 Renewable energy is an important form of farm diversification, recognised by the National Farmers Union as an important step towards making British agriculture carbon neutral within two decades. As farming is responsible for around a tenth of UK greenhouse gas emissions, supporting clean energy farm diversification projects is a vital step to reaching net zero.

Solar Farms as a Sustainable Agricultural Use

6.66 Solar farms represent an effective use of agricultural land that is not discordant with current or historic agricultural land use. The practice of using farmland as a renewable energy source goes back centuries. Solar PV is a very efficient way of using land to produce energy when compared with crops grown for biofuels such as biodiesel (predominantly from oil seed rape) and bioethanol (predominantly from wheat and sugar beet). Even ignoring the fuel used to sow and harvest energy crops and produce agrochemicals, solar PV produces 6-20 times more energy per acre than energy crops.

6.67 Not all land in agricultural use contributes to animal or human food consumption. Recent data from DEFRA confirms that 121 thousand ha of UK arable land is dedicated to the production of energy crops, clearly demonstrating that energy production is agricultural production. The UK grows around 490,000ha of oil seed rape a year, almost half of which is exported for biofuel production, some of which is then re-imported (with further transportation GHG emissions). By way of example, BP's Hull biofuel plant requires >1 million tons of wheat a year, making it the UK's biggest purchaser of wheat.

6.68 Data on the energy output per unit area suggests that in one year, oil seed rape for biodiesel produces 17,155 kWh/ha, wheat for bioethanol produces 31,509 kWh/ha and sugar beet for bioethanol produces 50,323 kWh/ha. By comparison, even without accounting for areas of the Site given over to environmental enhancement, the Development will produce 904,708 kWh/ha.

6.69 Farmland for energy is an agricultural use, and farmland for "homegrown" solar energy represents a much more efficient use of land. Subsidised energy crops are significantly less energy efficient, have carbon costs associated with producing comparatively less energy, and represent intensive practices that degrade soil quality and harm biodiversity. Dedicating agricultural land to temporary PV energy generation (with co-located grazing) will enable significantly more land for growing local, human and animal food crops because less land will be needed for inefficient energy crops. Therefore, allowing solar PV on agricultural land is in keeping with policies for the protection of agricultural land and the rural economy.

Impacts on Environmental Health and Amenity

Noise

6.70 The need to protect the environmental health and amenity of the local area and nearby sensitive receptors through minimising noise impacts, light pollution and risks to air quality is a requirement of planning policy.

6.71 A Noise Impact Assessment (NIA) has been produced to accompany the planning application. The assessment considers the potential noise generation from the plant associated with the Development, with respect to existing sound levels in the area. The NIA confirms that the Development is likely to have a 'low' impact on all receptors during both the day and night time. This is categorised as a 'No Observed Adverse Effect Level' (NOAEL).

6.72 On this basis, and with reference to the PPGN, it is considered that operational noise levels would be of a magnitude equating to a No Observed Adverse Effect Level (NOAEL) which is defined as: "*Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the acoustic character of the area but not such that there is a change in the quality of life.*"

6.73 With respect to pre-operational construction noise and vibration, there is no anticipated source of noise beyond that associated with construction traffic. No ground-breaking will be required and no generators will be used other than for temporary welfare cabins. All construction stage noise will occur during daytime periods when background noise levels are higher. Local knowledge from community engagement discussions confirms that in this particular area background noise levels are higher than most of the surrounding countryside due to the Site's location surrounded by busy transport infrastructure. Measures in the CTMP such as limiting

working hours and the prevention of vehicles idling will also help to minimise noise during working hours when background levels are high. Any further measures associated with considerate construction beyond working hours limits and traffic management can be set out in the pre-commencement CEMP.

6.74 Additionally, while primarily intended for the benefit of visual impact reduction and green infrastructure enhancement, the provision of a new 300m hedgerow with trees and 400m of shrub and tree boundary planting along the north-eastern border (between the Site and the railway line and M1 to the east), along with the >1km of new hedgerow with trees along the western boundary with the A5 will contribute to vegetated boundary noise buffers in accordance with Kilsby NDP Policy K3.

Glint & Glare

6.75 Solar panels are made up of silicon-based photovoltaic cells that are encased in a glass covering. Glass does not have a true specular reflection but does reflect a certain magnitude of light. Reflection of sunlight from PV panels is contrary to solar energy production. This is because the greater the amount of light which can be captured at the PV cell, the greater the amount of electricity that can be produced. Panel manufacturers use anti-reflective coating in the glass that changes the reflectivity from specular distribution to diffuse distribution. Therefore, as light falls onto the PV panels, most of the sunlight is transmitted to the cell beneath the glass with only a small amount reflected back in a multiple of angles and magnitudes. The result is an object that is perceived to have very little glare. Nonetheless, a Glint & Glare Study has been undertaken. The assessment pertains to the possible effects on surrounding road users, rail users and dwellings.

6.76 The modelling has shown that with respect to road users, the majority of the Site is screened due to existing vegetation, intervening terrain and the proposed hedgerow outlined as part of the Landscape Strategy Plan. There are some potential areas where views of the panels could not be ruled out. However, any glint or glare would only occur when the sun is low in the sky beyond the reflecting panels and would therefore coincide with direct sunlight, alongside any solar reflections not originating from directly in front of a road user. No significant impacts are predicted upon road users subject to the implementation of the LSP.

6.77 With regards to dwelling receptors, 14 out of the 16 identified dwelling receptors have geometrical possibility for glint and glare. However, when existing screening such as vegetation or buildings are considered and/or the proposed hedgerow planting as part of the Landscape Strategy Plan, no significant impacts are predicted upon the dwellings for seven of these receptors. The remaining residential receptors are expected to experience glare for more than 3 months per year, but for less than 1 hour per day. Therefore, upon implementation of the

hedgerow boundary to the west of the Site, no significant effects are predicted on surrounding dwellings.

6.78 With respect to railway drivers, no railway signals have been identified and intervening terrain and vegetation limit views for train drivers. For a small section of railway, reflections are possible from outside of a train driver's primary field of view, resulting in a low impact. No significant impacts are predicted upon train drivers subject to the implementation of the LSP.

Air Quality

6.79 For the Authority's reassurance, solar farms operate as a passive form of energy generation. There are no moving parts, industrial processes, or ancillary elements such as generators that could be associated with emissions or air pollution impact.

6.80 Traffic associated with an operational solar farm is negligible and likely to be less than the traffic movements of existing arable farming operations. There will be a brief temporary increase in traffic associated with the temporary construction stage. Measures within this application's CTMP provide for relevant air quality mitigation including, but not limited to, prevention of vehicle idling and control of dust/dirt, will prevent air quality impacts in construction. These will be expanded on in the pre-commencement CEMP.

Environmental Health Summary

6.81 Therefore with respect to environmental health, the Development would be compliant with National Planning Policy, WNC Part 1 Policy BN9, Daventry District Part 2 Policy RA2, Kilsby NDP Policy K3 and Crick Village NDP Policy Crick 1.

Flood Risk & Drainage

6.82 A site-specific Flood Risk Assessment has been undertaken to ascertain the potential risks involving flooding and drainage at the Site. The FRA confirms that the Site is located within Flood Zone 1 (low risk of flooding). The EA's risk of flooding from surface water mapping also confirms that the majority of the Site has a very low surface water flood risk. There are no other significant sources of flooding at the Site (e.g., groundwater, sewers or reservoirs).

6.83 Despite this, a sequential approach has been taken to the layout of the Development whereby the most vulnerable parts of the Development have been located in the areas of lowest risk flooding. Furthermore, all ancillary infrastructure has been located outside of higher risk areas, with mitigation designed-in including elevating ancillary buildings off ground level. Solar arrays are similarly elevated and designed for long-term exposure to the elements. Nothing about the nature of the Development is vulnerable to flood risk or at risk of increasing flood risk

elsewhere. Nor will the Development impede any surface water flow paths or displace any ponding of surface water.

6.84 The Development is classed as 'Essential Infrastructure'. Solar farms are suitable in flood-risk areas. The FRA provides reassurance that solar farms are not vulnerable to risk from flooding and that the solar farm will not increase the risk of flooding elsewhere or put strain on surface water drainage networks.

6.85 The FRA sets out in detail the Sustainable Drainage Systems (SuDS) for the Development. Although the Development is 'Major' by virtue of a >1ha red-line area, the actual ground impact is insignificant (less than 1% of the Site). Research undertaken by Cook and McCuen (2013)[xix] found that provided that full vegetation cover beneath the solar panels is maintained, the change in runoff characteristics from solar farm sites is likely to be insignificant and ground cover has a much more important control over runoff. For this reason, a landscape-led SuDs scheme is the most sustainable option.

6.86 The Development includes sufficient inherent and designed-in SuDS. All proposed access tracks are of a fully permeable construction. All ancillary buildings will, as part of the design, incorporate a 300mm deep subbase to be filled with permeable aggregate with a 30% void ratio and low fines content to provide sufficient attenuation storage, and are set atop the subbase with a 100-500mm void between the ground level and floor level of the buildings.

6.87 Solar arrays themselves are not a single façade. There are gaps between stacked panels in an array, meaning water does not drip into only one location. A gentle 15-30 degree angle means water will not run down with velocity that helps it to "jump" gaps. Rather, water runs off at a reduced speed and drips down through the gaps at multiple points onto vegetated ground beneath the arrays. There is no risk of water sheeting down in one area at the lower edge of the arrays and causing erosion that alters existing runoff patterns.

6.88 In addition to the above, appropriate seeded vegetation cover will be provided below and between rows of the solar panels to act as a level spreader/energy dissipater to promote low erosivity sheet flow during operation of the solar farm. Grass will not only grow between array gaps; it includes all ground under the arrays as well. This means that excluding access tracks and ancillary buildings most of the Site will be fully vegetated species-rich grassland. This is a significant betterment for surface water flood risk conditions compared to intensive grazing use or arable use with frequent periods of patchy or bare vegetated ground cover.

6.89 Additionally, the 4-6m vegetated gaps between the arrays are natural filter strips that slow the movement of surface water and promote infiltration. All existing boundary vegetation is to be retained with significant new planting proposed. Boundary vegetation will also be a source of infiltration, including approximately 1.4km of new boundary hedges along with new tree

planting. There will be no change to existing land contours to facilitate the arrays which will respond to the existing topography. This means existing runoff characteristics and flow routes will not be altered, and boundary features will remain suitably hydrated.

6.90 The new buildings on a permeable gravel base are not changing any underlying conditions beyond the topsoil. What would otherwise be topsoil is being replaced by gravel which has more porosity and storage capacity than the existing topsoil would have. This means even if the gravel base is insufficient for storage and infiltration, the resulting conditions are no different than they would be on the as-is farmland, except that the extra storage capacity of the gravel base is a betterment compared to the topsoil. In the event that the sub-base reaches capacity, excess water will overtop and be conveyed by gravity across the fields mimicking the existing site runoff characteristics. This approach will aid in managing flood flows, whilst at the same time ensuring that the vegetated ground cover and existing and new boundary vegetation receive suitable hydration.

6.91 The Development prioritises a nature-based solutions approach to SuDS that is appropriate for the temporary development and the eventual restoration to arable use. Implementation and management of soft landscaping (ground cover and boundaries) are the primary mechanism for surface water management and will provide multifunctional benefits compared to existing intensive agricultural practices.

6.92 The above outlines the SuDS strategy. It is expected that there will be planning conditions for a pre-commencement CEMP and a pre-operational LEMP. The former would deal with the holistic environmental management of the site during construction. The latter would deal with the Site's holistic environmental management once operational. It is anticipated that the content of these conditions could secure flood risk interests in construction and the whole-life maintenance of any SuDS in accordance with the SuDS Manual (C753F).

6.93 The provision of a surface water management system, which incorporates rural SuDS elements and a landscape-led approach to mitigating surface water flood risk ensures that potential detrimental impacts on flood risk and water quality are avoided and that betterment can be achieved throughout the anticipated lifespan of the Development.

6.94 The Landscape Strategy Plan outlines the proposed planting framework and enhancement to the quality of grass cover to provide landscape-led SuDS. The Site will be permanently vegetated and include longer tussocky grassland within margins which will provide betterment to surface water run-off and erosion. The Development is therefore in accordance with national policy, as well as the WNC JCS Policy BN7, DDC Part 2 Plan Policy ENV11, Crick Village NDP Policy Crick 11.

Transport and Access

6.95 A Transport Statement (TS) and CTMP have been prepared in support of this application. These provide detail on the access to be taken from Kilsby Road and information on expected traffic impacts associated with the temporary construction phase. The CTMP sets out how the Development can be implemented safely and without undue impact on the local road network.

6.96 It is anticipated that the construction of the Development would take between six to ten months. On an assessment over a seven-month time period, it is estimated that there will be an average of 5 HGVs per day accessing the Site.

6.97 There will also be construction workers arriving at the Site in the morning and departing in the evening, although the numbers involved are forecast to be relatively low on a day-to-day basis and will occur outside of peak hours. The level of traffic forecast during the temporary construction phase would represent a short-term temporary increase against existing traffic levels but can be managed (as per CTMP) to avoid adverse impact.

6.98 Once completed, operational traffic is very low, at approximately one to two light vans or 4x4 vehicles per month. There will be less intensive use of existing farm access compared to the current use. The TS and CTMP establish that the temporary construction traffic associated with the Proposed Development will not have a material effect on the safety or operation of the local highway network. An overview of solar farm construction and key CTMP measures to secure the safety and amenity of road users is set out in the DAS.

6.99 The CTMP would also outline protections relevant to PRoW, whilst the LEMP (to be secured by planning condition) would include the long-term enhancement and management of these features. The Development includes a permissive path linking Kilsby Road to the ProW EW2 which arose from suggestions given during community consultation and engagement.

6.100 As the Applicant would own and operate the Site, there will be electric vehicle charging points (2 no.) to be delivered under permitted development rights. This is to support the transition of the Applicant's Operations and Maintenance (O&M) team to an electric fleet. The TS concludes that the Development would not create any significant transport impacts on the existing highway and there are no safety reasons why planning permission should not be granted. The Development is in accordance with the NPPF, Policy ST1 and ENV4 of the DDC Part 2 Plan, and Policy K2 & K5 of the Kilsby NDP.

Sustainable Development Assessment

6.101 The Development represents a sustainable scheme that is supported by local and national policy. Sustainable development is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Assessment of

sustainability can be broken down into three primary headings; Economic, Social, and Environmental. A summary of the Development and its benefits with respect to the ambits of Sustainable Development is as follows:

6.102 The solar farm represents a temporary rural diversification strategy. This is key to the long-term overall survival of smaller family farms that are much more at risk from the destabilising impacts of climate change than larger commercially farmed estates. The co-location of grazing will enable the farm to maintain agricultural output and economic activity alongside the solar arrays. Although the solar farm will reduce arable activity on the most northern field, the primary grazing use will be maintained, although through sheep instead of the current more intensive sheep and cattle grazing. This, alongside the more species-rich pasture grassland planting, provides for resting and improvement of the soil over the lifetime of the Development. This period of soil recovery is an investment in the primarily Grade 3b farmland's agriculture future with respect to the quality and versatility of the soils.

6.103 The Development will generate local economic activity during construction and operation. As an IPP who will build and operate the solar farm, Voltalia company bylaws include a commitment to employ and spend locally where possible. The most recent project of the same scale (49.9MW in Dorset) generated 4 new full-time local jobs and Voltalia awarded contracts worth >£3.1m in the southeast region, including £800k within 25 miles of the site. Similar opportunities will be available in association with the construction of the Development.

6.104 Although the aforementioned economic activity is dependent on the availability of local options, there are certain direct local economic benefits during the construction stage. If workers are not local, they would be staying at local hotels and availing themselves of local shops and facilities, thus providing a boost to small businesses and the struggling hospitality industry.

6.105 There is further assured local economic benefit through Business Rates. While agricultural economic activity will remain in a co-located way, the temporary change of use means there is no Business Rates exemption. Crick Solar Farm will generate at least £4 million in revenue under the current regime, which has both economic and social benefits through the Council's public interest spending.

6.106 The Development includes a DNO substation. This is necessary for grid connection but will be a DNO-owned asset. Developments of this ilk are essential to maintain investment levels and fund essential grid network upgrades for the benefit of all users. Without developer contributions, the cost of upgrades would be passed on through higher energy bills.

6.107 Locating solar farms of this scale in the urban-fringe countryside with higher energy demand is necessary for economic sustainability. Solar is an essential part of the UK's energy security strategy; it makes the UK more economically secure and resilient to be self-reliant for energy

instead of having to rely on imports, with the uncertainties and moral compromises this can entail. Energy security is also essential to energy affordability for ordinary people, and economy-wide economic stability, as evidenced by the effects of recent small provider collapses, shortages, and extreme price rises that are at the heart of the cost of living crisis.

6.108 The above does not represent the whole of the Development's economic benefit because the principles of sustainable development are intrinsically linked. Crick Solar Farm is a contribution to the betterment of local ecosystem services. Ecosystem Services are the benefits provided by ecosystems that contribute to making human life both possible and worth living. Examples include 'goods and services' like food, water, energy, and regulation of floods, and non-material benefits such as recreational and wellbeing benefits. Damage to the environment has a degrading impact on ecosystem services in a way that has a direct and indirect economic and social impact. In the context of a declared climate and biodiversity emergency, it is essential to consider the positive economic and social knock-ons of a Development where the headline benefits are environmental, or the negatives of a failure to approve sustainable developments.

6.109 As with the economic arm of sustainability, many of the positive social gains reflate to ecosystem services and green infrastructure benefits and are understood by a holistic consideration of inter-dependencies. For example, the increase in Business Rates can mean more money for local social-benefit spending. Or the more money the Council has to spend dealing with harm from increasing extreme weather events, the less money is available for public-good spending like libraries or the provision of outdoor play areas. It is also well-established that enhancements to biodiversity in one area have positive ecological effects elsewhere, and that there are both direct and indirect links between environmental quality and psychological and physical health. The BNG of at least 77% uplift in Habitats and 127% uplift in Hedgerows associated with the scheme therefore has social benefit as a knock-on of its more direct environmental benefit.

6.110 A more direct social benefit is provided by the enhancement to the green infrastructure network through the provision of an >1km Permissive Path linking Kilsby Road with Footpath EM20. The A5 south of Kilsby Road includes pavement for walkers and cyclists but there is no pavement north of Kilsby Road. The new permissive path will provide a safer alternative and help to improve linkages between villages via the link between the pavement to the south and the PRoW network to the north.

6.111 Climate change also poses a significant economic risk. The rural economy is highly exposed to risk from the impacts of climate change including livestock stress, crop blight, lower cereal yields, and destruction by extreme weather but harm to farming businesses is not only an economic negative. The IPCC report *Climate Change 2022: Impacts, Adaption, and Vulnerability* (2022)[xx] states that climate change is "*increasingly hindering efforts" to meet the nutritional*

and calorific needs of humanity" and is already affecting "*all dimensions of food security*". This includes availability, access, stability, food quality and safety. Therefore, the negative economic impacts of climate change on farm output have a significant negative social impact, as does the effect of rising energy costs as can be seen from the acute cost of living crisis.

6.112 Recent reporting[xxi] suggests that the 23 solar farms refused across the UK in 2021-22 would have powered 147,000 homes with clean energy and reduced the UK energy bill by £100m, thus demonstrating that each individual solar farm, like the proposed Development, makes a valuable contribution to economic and social sustainability.

6.113 Positive environmental benefits are the most directly obvious. The Development will produce enough clean electricity to meet the electricity needs of around 14,194 average family homes. This provides a CO_2 displacement of 35,207 tonnes per annum compared to the same amount of energy from fossil fuel sources and is equivalent to removing around 5,826 cars driving 15,000 miles a year from the road. The environmental benefit of renewable energy replacing electricity from fossil fuels is a significant weight in the planning balance and has greater weight in the context of the climate emergency and Net Zero obligation.

6.114 Meeting the scale of change required in greenhouse gas emissions requires taking land out of agricultural use. The Natural England report[xxii] on carbon and habitat states:

> **'Agricultural land currently covers 70 per cent of the terrestrial area of England. The UK target to meet net zero is dependent on making changes to the way we use and manage our land, with agricultural land often forming the baseline of land use change. The Committee on Climate Change (2020) recommend that around one-fifth of agricultural land will need to be released before 2050 for actions that reduce emissions and sequester carbon. The large area of agricultural land in England, and its management, means it plays a significant role in England's carbon balance. The sector contributed 10 per cent in total national GHG emissions in 2019 (BEIS 2021)'**

6.115 Change is necessary and where change will be most effective is where land is not the best and most versatile for agriculture, where natural ecosystems are most degraded, and land where the change can offer the greatest ecosystem services returns. The Site is not operationally BMV land and it is a location with proximate demand for renewable electricity which means no inefficiencies and losses that occur when energy travels over longer distances.

6.116 Alongside this, climate change and biodiversity loss are closely linked problems and need to be addressed in an integrated way. The way to reverse environmental degradation and ensure social, economic, and environmental resiliency in the face of climate change is through a joined-up Nature-Based Solutions (NBS) approach, addressing climate change and biodiversity decline together to meet the multiple demands on our environment (Natural England, 2019)[xxiii].

6.117 NBS are actions which support biodiversity and provide for people, including health and wellbeing, at the same time. A widely used definition is that of the IUCN (2020)[xxiv]:

> **'Nature-based Solutions are actions to protect, sustainably manage, and restore natural or modified ecosystems that address societal challenges effectively and adaptively, simultaneously providing human well-being and biodiversity benefits.'**

6.118 This is a key concept for tackling the climate and biodiversity crises as affirmed by the WNC Emergency Declaration. The Development's BNG of +77% for habitats and +127% for hedgerows, is a valuable contribution in its own right and this solar farm represents the type of joined-up approach that reflects truly sustainable development.

6.119 Aside from the CO_2 displacement of fossil fuels the Development provides offsetting through biodiversity and habitat improvement. Hedgerows, trees outside woodland, and scrub contribute to carbon sequestration and storage at the same time as supporting important aspects of biodiversity. They can also provide other benefits for agricultural ecosystem services, including reducing soil erosion and providing shelter for both livestock and wildlife.

6.120 Alongside new boundary planting, the majority of the land will be converted from intensive arable to a combination of wildflower meadow, species-rich pastoral, and tussocky grassland that will be organically managed through light grazing. This is a contribution to both BNG and climate change mitigation; grazed grassland sequesters more carbon than mown grassland due to the greater return of organic matter and nutrients. In addition, grazing alters the soil microbial community which enhances the availability of substrate which favours SOC sequestration (Gilmullina and others., 2020)[xxv].

6.121 The Development also includes elements to support wildlife and insects. These are not accounted for in formal BNG calculations but make a valuable contribution to immediate and wider ecosystem health. Such features include log piles, reptile hibernacula, bat boxes, dormouse boxes, barn owl boxes, and bird boxes. The perimeter fencing will have mammal gaps to enable and encourage foraging across the Site. The Applicant has also expressed continued openness to recommendations that might be made by consultees on other complimentary features that would enhance local green infrastructure.

6.122 By combining significant contributions to climate change mitigation and biodiversity gain, along with the socioeconomic benefits detailed in the section above, the Development represents a true multi-functional green infrastructure scheme that makes a positive contribution to local ecosystem services and a sustainable rural economy. It is therefore considered that the Development accords with the underlying rationale of the NPPF, the underlying objective for the adopted WNC JCS LP1 and the Daventry area Part 2 LP.

7.0 CONCLUSION

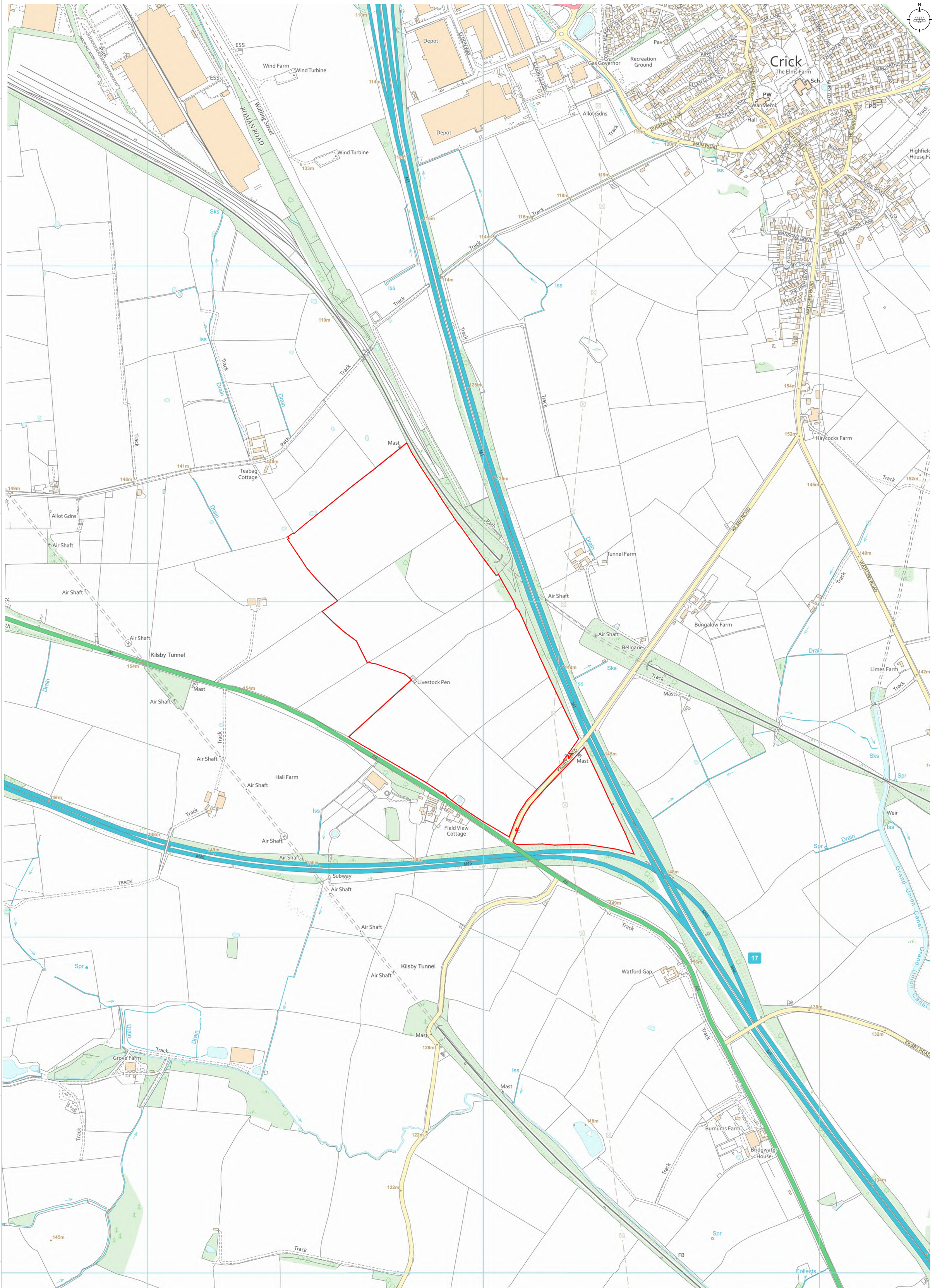
7.1 This PS supports a planning application submitted on behalf of Voltalia UK Ltd for the following development:

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

7.2 The Development comprises ground-mounted photo voltaic panels with an export capacity of up to 49.9MW of renewable electricity at peak operation. The Development is proposed for a period of up to 40 years.

7.3 The Development is in accordance with local and national planning policy and will make a significant contribution to the transition to a renewable energy system and the delivery of net zero. The Applicant has extensively consulted with local stakeholders and has iteratively designed the Development to take account of local concerns. In conclusion, it is considered that the complies with the adopted development plan and all other material considerations. Planning permission should therefore be granted accordingly.

APPENDIX A
SITE LOCATION PLAN [CRI-01-SP-01]



0 50 100 150 200 250 300 350 400 450 500m

SCALE 1:5000

Key:

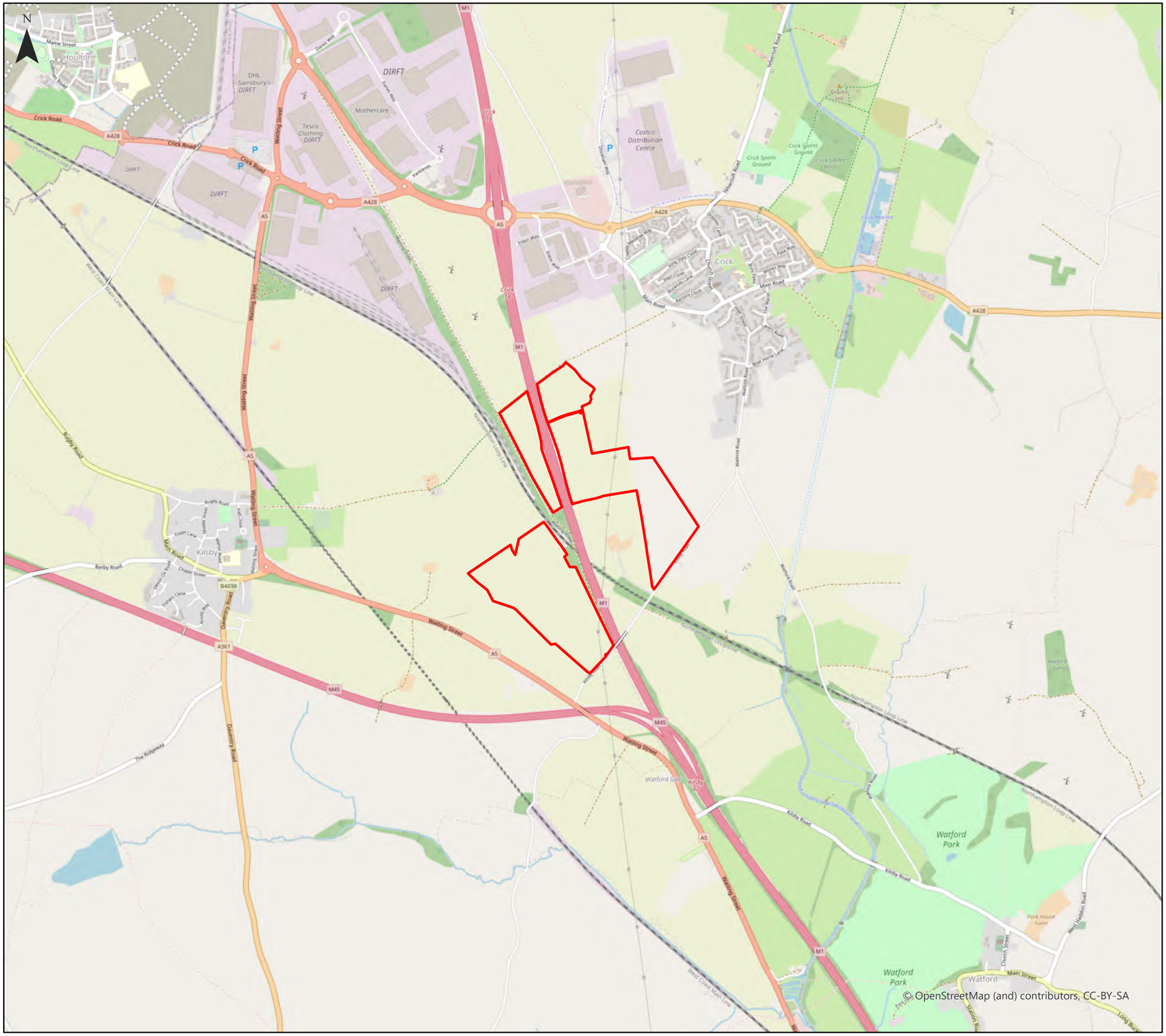
Site Boundary

VERSION	PURPOSE	DRAWN	VERIFIED	DATE
01	First Issue	MC	RJ	22.09.2022

CLIENT:	-	DRAWN:	MC	SERVICE: General
PROJECT:	CRICK PV FARM	VERIFIED:	RJ	STAGE: Development
		DATE:	22.09.2022	RELEASED BY: GED
SITE:	Kilsby, East Midlands, United Kingdom	SCALE:	1:5000	VOLTALIA
DRAWING DESIGNATION:	Site Location Plan	PROJECT N°:	CRI01	28 rue de Mogador
		FORMAT:	A1	75009 Paris, France
		DRAWING N°:	CRI01-PL-03	Tel: +33 (0)1 44 63 14 40

APPENDIX B
PREAPPLICATION ADVICE RED LINE

Crick Solar Farm
Site Location Map
Figure 1



Key

Development Boundary

Neo Office Address:
Cinnamon House, Crab Lane, Warrington, WA2 0XP

Date: 19/08/2020
Drawn By: Jamie McGhee
Scale (A3): 1:20,000
Drawing No: NEO00737/005I/A

neo ENVIRONMENTAL

APPENDIX C
DAVENTRY DISTRICT COUNCIL EIA SCREENING OPINION (JUNE 2020)

Daventry District Council

Lodge Road, Daventry, Northamptonshire NN11 4FP
Tel: 01327 871100 Fax:01327 300011 DX21965
Website: www.daventrydc.gov.uk
Chief Executive: Ian Vincent B.A. (Hons) Arch, Dip Arch, RIBA

10 June 2020

James Nichol- Pegasus Group
1st Floor South Wing
Equinox North
Great Park Road
Bristol
BS32 4QL

Team: Resources
Please respond to: S Hammonds
Direct Line: 01327 302585
E-mail: shammonds@daventrydc.gov.uk

Our Ref: EIA/7/133
Your Ref:

Dear Mr Nichol,

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 AS AMENDED
LAND SOUTH WEST OF CRICK – PROPOSED SOLAR ENERGY SCHEME
REQUEST FOR SCREENING OPINION

I refer to your email of 20 May 2020, together with the accompanying document, dated April 2020, and 'Site location plan', requesting a screening opinion in respect of a proposal for a solar energy scheme on land south west of Crick, all as described in your email and its attachments.

The proposed development appears to the Council to be one that falls within the definition of development set out in Column 3.(a) ("Energy Industry"), of the table to Schedule 2 of the Regulations, and is above the applicable threshold (0.5ha) set out in the table. The proposed development would not fall within Schedule 1.

The local planning authority has taken account of the details contained in the documents that formed your screening request, and of the Regulations, including the relevant selection criteria set out in Schedule 3. The local planning authority **does not** consider that an Environmental Impact Assessment (EIA) is required for the proposed development. This is **the adopted screening opinion of the Local Planning Authority** on the proposed development, as described in your screening request.

Regulation 5 (5) requires a local planning authority, when adopting a screening opinion, to provide written statement of the reasons for reaching its conclusion. The Council's statement of reasons in relation to its conclusion on your screening request is as follows:

- The proposed development would be located within open countryside and away from the established confines of Crick and Kilsby villages. The Council considers that the characteristics of the proposed development are such that it would not constitute a major development of more than local importance. There are no identified transport

impacts (eg involving the transportation of fuel or by-products) that would affect this conclusion.

- The site of the proposed development comprises agricultural land. The site is not the subject of any statutory environmental designations and on the basis of the information presently available, the Council considers that the location of the development is not one that is particularly environmentally sensitive or vulnerable.

- The proposed development would comprise an extensive construction of low-rise structures (not exceeding 3m in height) within a gently undulating landscape that is already significantly affected by the busy transport networks that run through it in this vicinity (including the West Coast Mainline railway, the M1, M45, and A5 trunk roads, local roads and footpaths and the Grand Union Canal). The landscape is also influenced visually by nearby wind turbines and by large commercial buildings to the north. There exists the potential for landscaped screening to mitigate the visual appearance in the local landscape. It is not considered that any cumulative visual impacts with these existing surrounding features would be sufficient to generate a significant landscape impact. A robust Landscape and Visual Impact Assessment (LVIA) with any forthcoming planning application would be sufficient to allow consideration of the impact on the landscape.

- A Heritage Impact Statement with any forthcoming planning application would be sufficient to allow consideration of the impact on the adjacent Scheduled Monument (Watling Street Roman Road) and any impact on the setting of the more outlying listed structures (all over 0.7km away).

- Having regard to the location, nature and scale of the proposed development, the Council considers that the effects of the proposed development would not be unduly complex or potentially hazardous.

- Overall, the Council considers that the proposed development is not likely to have significant effects on the local environment by virtue of factors such as its nature, size or location and, therefore, it does not fall within the definition of EIA development, as set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

Please note that this determination only relates to a consideration of whether the proposed development is EIA development. It should not be construed as a consideration of the planning merits of the proposed scheme and is without prejudice to the formal determination of any future planning application that may be submitted for the proposed development, which would have to be assessed against the relevant development plan policies and any material considerations. Any such application would be within the public domain and would be subject to consultations with local residents, parish councils, and other third parties.

Yours sincerely

S Hammonds
Senior Planning Officer

[i] Natural England. 2010. Agricultural land Classification Map East Midlands (ALC2007). Available from: Natural England Access to Evidence - Likelihood of Best and Most Versatile Agricultural Land

[ii] SI 2017/571, as amended by SI 2018/695

[iii] Climate Change Act 2008. Available from: https://www.legislation.gov.uk/ukpga/2008/27/contents

[iv] The Committee on Climate Change. 2019. Net Zero – The UK's Contribution to stopping global warming. Available from: https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/

[v] HM Treasury. 2020. National Infrastructure Strategy. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938539/NIS_Report_Web_Accessible.pdf

[vi] Department for Business, Energy and Industrial Strategy. 2020. Energy White Paper: Powering our net zero future. Available from: https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future

[vii] Department for Business, Energy & Industrial Strategy. 2021. Net Zero Strategy: Build Back Greener. Available from: https://www.gov.uk/government/publications/net-zero-strategy

[viii] Department for Business, Energy & Industrial Strategy. 2022. British Energy Security Strategy. Available from: https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy

[ix] Department for Business, Energy & Industrial Strategy. 2022. Energy Security Bill. Available from: https://www.gov.uk/government/publications/energy-security-bill-factsheets

[x] Daventry District Council Tackling the Climate Emergency. 2022. Available from: Daventry District Council - Tackling the climate emergency (daventrydc.gov.uk)

[xi] Department for Energy & Climate Change. 2011. Overarching National Policy Statement for Energy (EN-1). Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf

[xii] Department for Business, Energy & Industrial Strategy. 2022. Draft National Policy Statement for Renewable Energy Infrastructure (EN-3). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015236/en-3-draft-for-consultation.pdf Accessed February 2022

[xiii] West Northamptonshire Joint Core Strategy Part 1. 2014. [Online]. Available from: Strategic planning and West Northamptonshire policies | West Northamptonshire Council (westnorthants.gov.uk)

[xiv] Daventry District. 2020. Settlements and Countryside Local Plan Part 2. [Online]. Available from: Daventry District Council - Part 2 Local Plans (daventrydc.gov.uk)

[xv] Kilsby Parish Council. Neighbourhood Development Plan 2022-2029. Available from: Daventry District Council - Made Neighbourhood Development Plans (daventrydc.gov.uk)

[xvi] Crick Village Neighbourhood Development Plan 2018-2029 (revised 2021). Available from: Daventry District Council - Made Neighbourhood Development Plans (daventrydc.gov.uk)

[xvii] Daventry District Council. Energy and Development SPD. 2007. Available from: https://www.daventrydc.gov.uk/EasySiteWeb/GatewayLink.aspx?alId=10416

[xviii] Daventry District Council. Biodiversity SPD. 2017. Available from: https://www.daventrydc.gov.uk/EasySiteWeb/GatewayLink.aspx?alId=44643

[xix] Cook L. and McCuen R. (2013) Hydrologic Response of Solar Farms. Journal of Hydrologic engineering 18:536-541

[xx] IPCC Sizth Assessment Report. 2022. Available from: Climate Change 2022: Impacts, Adaptation and Vulnerability | Climate Change 2022: Impacts, Adaptation and Vulnerability (ipcc.ch)

[xxi] The Guardian. 2022. Solar Farm plans refused at highest rate for five years in Great Britain. Available from: Solar farm plans refused at highest rate for five years in Great Britain | Solar power | The Guardian

[xxii] Natural England. 2021. Carbon Storage and Sequestration by Habitat 2021 (NERR094). Available from: Carbon Storage and Sequestration by Habitat 2021 - NERR094 (naturalengland.org.uk)

[xxiii] Ibid.

[xxiv] IUCN. Nature Based Solutions. Available from: Nature-based Solutions | IUCN

[xxv] Gilmullina, A. and others. 2020. Management of grasslands by mowing versus grazing – impacts on soil organic matter quality and microbial functioning. Applied Soil Ecology. 156: 103701.