Young Planning & Energy Consenting

Report prepared on behalf of:

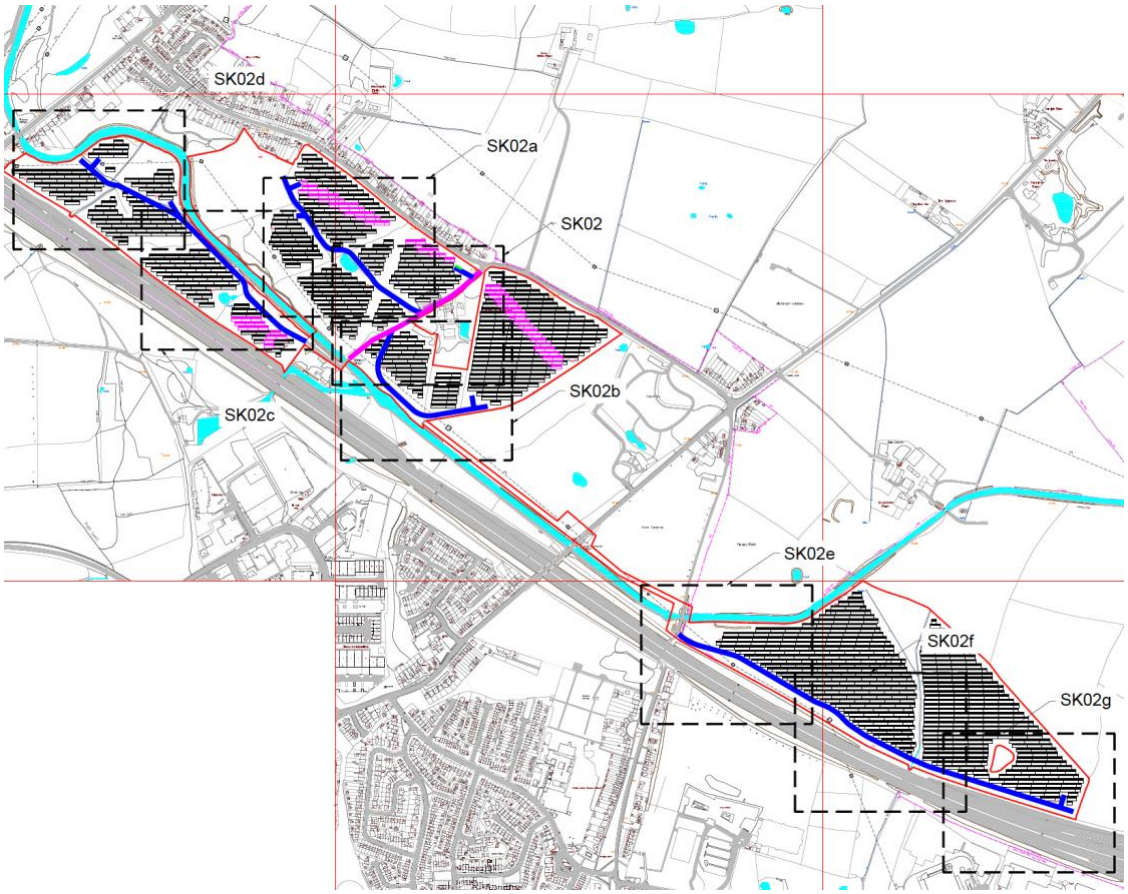
Council of the City of Coventry

Date:

29 May 2023

Planning Statement (including Pre-Application Consultation and statement on Design & Access)

Proposed Solar Farm and Associated Development; Land adjacent to Lenton's Lane, Alderman's Green, Coventry



Info

Planning Statement prepared by Young Planning & Energy Consenting on behalf of the Council of the City of Coventry.

Submitted in support of application for planning permission for solar farm development, including solar arrays, control buildings and associated infrastructure, internal access roads, landscaping and associated development.

Includes:

- Details of Pre-Application Consultation; and
- Statement on Design & Access.

TABLE OF CONTENTS

1 Introduction

1.1 This Planning Statement accompanies an application by the Council of the City of Coventry ("the Applicant") for planning permission for a solar farm development including solar arrays, control buildings and associated infrastructure, internal access roads, landscaping and associated development ("the Proposed Development"), at land adjacent to Lenton's Lane, Alderman's Green, Coventry ("the site").

1.2 The site crosses the administrative boundaries of Coventry City Council and Rugby Borough Council (CCC and RBC respectively, together "the planning authorities"). Duplicate planning applications have been submitted to each planning authority; since the majority of the site is located within the CCC area, it will take the role of lead planning authority.

The Site

1.3 The Site comprises 51 hectares (ha) (126 acres) of primarily agricultural land, bisected by the Oxford Canal and adjacent to Lenton's Lane Cemetery and Sowe Common. It is bound by the settlement of Alderman's Green to the north, the M6 and Coventry Cruising Club to the south and the B4109 to the west.

1.4 The site slopes from roughly north to south, from Lenton's Lane towards the M6 motorway, and is crossed by several overhead electricity and telecoms cables, towers and poles.

1.5 Identification of the site as an appropriate location for the Proposed Development follows the identification of an appropriate nearby grid connection location with capacity to connect a solar farm of the scale proposed. Such an approach follows national policy on renewable energy, whilst the identification of the specific application site takes account of the Applicant's land ownership in the area.

Background to the Proposed Development

1.6 The Applicant is committed to contributing to the delivery of the UK Government's 2050 net zero targets and has enshrined it's commitment in a Climate Change Strategy (CCS). The CCS *"…establishes the framework of how Coventry City Council plans to work as a local authority, and through its arms-length operating companies, to meet sustainability objectives combatting waste and pollution, promoting biodiversity and its focus on the need to tackle climate change and adapt to the inevitable changes to our climate in Coventry and the UK."*

1.7 As part of the CCS and in order to deliver on this "One Coventry" approach, the Applicant has identified five areas of work or pathways to change:

- Low emission development: Low emissions and new economic opportunities;
- Circular development: Recycling and reusing resources;
- Nature-based development: Protecting habitats and wildlife;
- Resilient development: Coping with the consequences of climate change; and
- Equitable development: Addressing the effects of climate change on vulnerable low-income families.

1.8 The Proposed Development contributes to several of these objectives.

1.9 The previous Carbon Management Plan had a commitment that 15% of energy used by CCC would be from renewable sources. CCC aims to strengthen this ambition by meeting this commitment with Local Renewable Generation rather than relying on imported renewable energy from the rest of the UK. The direct deployment of renewable energy generation is also part of the plan to deliver a more financially sustainable Council by reducing the exposure of the council to the extreme fluctuations in energy prices experienced recently in relation to imported energy. Following an extensive roof-top solar PV installation plan on Council properties over the past 18 months, CCC has begun to realise this enhanced commitment. However, with the recent escalation in the delivery of electrification of heat and transport in line with meeting the UK's 2050 Net Zero target, a step change in the amount of locally generated renewable electricity is needed to continue to meet this commitment. The proposed development will deliver this step change in the provision of locally generated renewable electricity.

1.10 The CCS is underpinned by the One Coventry Plan 2022-30 ("the OCP"), which sets out CCC's "…vision and priorities for the city…", which includes the creation of "a city, that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change."

1.11 The Applicant's aspiration of delivering physical development demonstrates its commitment to making its contribution, and the identification of an appropriate site and a development proposal appropriate to its surroundings, result in a sustainable and appropriate proposal.

The Proposed Development

1.12 The Proposed Development will comprise the following elements:

- *Approximately 65,000 ground mounted solar panels, arranged into arrays and laid out across the site. The panels will be mounted on aluminium (or similar) frames embedded into the ground or on moveable concrete footings (where panels are above underground service wayleaves);*
- *13 Invertor containers located at strategic locations arranged around the site;*
- *A small scale control and grid connection building approximately 14m in width, and 4m in width;*
- *Internal site electrical connections, to be made underground;*
- *4m wide access tracks providing access from existing public roads to the development parcels;*
- *Security fencing no greater than 2m in height around the solar arrays;*
- *Security cameras located at strategic points, facing into the site;*
- *A temporary construction compound of circa 25m x 50m to enable the safe and efficient servicing of the site during construction and to be removed post construction works; and*
- *Localised access and environmental enhancements and measures to offset environmental, visual and glint / glare impacts.*

This Planning Application

1.13 This planning application forms part of a comprehensive suite of supporting documentation, which also includes:

- Biodiversity Net Gain Assessment;
- Ecological Appraisal;
- Agricultural Land Classification Report;
- Construction Traffic Management Plan;
- Flood Risk Assessmewnt;
- Land Contamination Desk Study and Preliminary Risk Assessment;
- Glint & Glare Assessment; and
- Full suite of planning application drawings.

Statement on Design & Access

1.14 With a site area exceeding 1-hectare (ha), the Proposed Development is "major" development as defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015 ("the DMP Order").

1.15 Article 9 of the DMP Order considers the need for Design and Access Statements (D&AS) in respect of the major developments. Article 9(4) provides that D&AS is not required in respect of engineering operations. The Proposed Development falls within such definition and as such D&AS is not necessary and is not provided in respect of the Proposed Development.

EIA Screening

1.16 Environmental considerations are assessed on a topic-by-topic basis, as documented above. The scope of these reports has been informed by discussions with relevant stakeholders, including departments within the planning authorities. In addition, Environmental Impact Assessment (EIA) screening opinions have been sought from the planning authorities, through submissions made on 6 March 2023. The planning authorities subsequently "screened out" EIA in respect of the Proposed Development:

- CCC "screened out" and issued a formal screening opinion dated 17 April 2023 (CCC ref: PL/2023/0000513/SCR); and
- RBC "screened out" and issued a formal screening opinion dated 15 March 2023 (RBC ref: R23/0316).

1.17 Given the cross-boundary nature of the Proposed Development, duplicate applications have been made to CCC and RBC.

2. Pre-Application Consultation

2.1 This section documents the pre-application community consultation (PACC) undertaken by the Applicant.

Legislative and regulatory context

2.2 Sections 60W and 60X of the Town and Country Planning Act 1990 ("the 1990 Act") set out respectively, that some applications for planning permission require pre-application community consultation to be undertaken, and that comments received through such a process be taken into account.

2.3 The DMP Order provides further detail, defining "major developments" to which the requirements of the aforementioned Section 60W applies. Major development includes development of sites in excess of 1-ha, meaning the Proposed Development is considered "major development". The requirements of Sections 60W and 60X therefore apply and have been taken into account in scoping the extents of the PACC activities.

PACC activities

2.4 The PACC process focussed upon two main activities:

- A public event, held on 9 February 2023 between the hours of 1500-1900, at Lenton's Lane Baptist Church ("the public event"); and
- An online consultation exercise hosted on the Applicant's Let's Talk Coventry platform ("the online consultation").

2.5 The combination of the two activities sought to deliver a convenient process which provided options for interested parties to review materials in their own time and/or attend to view physical copies and ask questions of the Applicant's project team.

2.6 The public event was advertised online and a total of 200 letters were delivered to residents of Lenton's Lane, including all residential properties adjacent to the Site.

2.7 The public event was hosted by representatives of the Applicant's project team, who presented a series of display boards and were available to discuss the Proposed Development, answer queries and gather feedback. A total of 89 attendees were recorded, mainly local residents, and written feedback was provided via comments cards and follow-up emails.

2.8 The online consultation provided the consultation materials to a wider online audience. Feedback could be provided via online submissions, a total of 125 of which were received.

Feedback received

2.9 The project team gathered and reviewed all feedback received through the public event and online consultation. Feedback varied, and was often positive in terms of the principle of the Proposed Development as a renewable energy development contributing towards national, regional and local energy decarbonisation targets, whilst highlighting potential local environmental considerations.

2.10 The latter in particular were useful in allowing the project team to appropriately scope the assessments being undertaken in support of the planning application, whilst also allowing the Applicant to reconsider elements of the Proposed Development. The most commonly-raised local environmental considerations include:

- Proximity of the Proposed Development to residential areas, and associated visual, flooding, noise and traffic considerations;
- Accessibility both in terms of construction and operational traffic, and in terms of the maintaining of public access within and around the Site;
- Development on Green Belt land;
- Security and the impacts of security infrastructure (lighting, for example);
- Impact of solar farm development on physical and mental health; and
- Future of agriculture on the Site.

2.11 Comments were also received on associated matters, including the role of solar energy as part of the renewable energy mix, the ongoing development/community consultation process.

2.12 Issues raised through the PACC process are addressed throughout the wider suite of planning application documentation. The following sub-section considers how the feedback informed amendments to the Proposed Development, and indeed the wider development process.

How feedback informed the Proposed Development

2.13 Several comments focussed upon the proximity of the Proposed Development to dwellings along Lenton's Lane. Based upon this feedback, the Applicant reconsidered the solar array layout and in respect of those immediately adjacent, removed several panels in order to provide some distance between dwellings and the operational infrastructure.

2.14 The Applicant also considered the layout immediately east/south east of this area, but focussed reconfiguration on areas immediately adjacent rather than those physically separated by other infrastructure and existing screening.

2.15 Pedestrian connectivity was raised and the Applicant has re-configured pathways to maintain comparable pedestrian access. Existing pedestrian access through the site will be re-routed around the boundaries and through the Site, as is appropriate in the context of an operational site. Diverted routes could form linkages and become incorporated in any improved pedestrian and cycle environment which may potentially emerge in the future.

2.16 Public health considerations were raised through feedback obtained at and following the public event. There are no physical health implications associated with the Proposed Development, indeed it contributes towards improved air quality as part of a decarbonised energy industry. The Applicant has embedded mitigation measures designed to minimise the effects of the Proposed Development, including during construction. Such measures include the aforementioned maintaining of public access, commitments with the Construction Traffic Management Plan which minimise disturbance to local residents, and environmentally sensitive construction methods also designed to minimise disturbance.

2.17 Whilst not a physical change to the Proposed Development, feedback during the public event highlighted the local community interest in remaining involved through planning and

development processes. The Applicant committed to maintaining contact with the local community which, in the first instance, involves ongoing communications through key stages in the process, for example a letter drop informing the community of the submission of this planning application.

Community Benefit

2.18 The proposed solar farm is part of a wide range of initiatives helping deliver the Council's climate change ambition. The power it generates will be sustainable, clean, green energy - sensitive to the natural environment.

2.19 There will be local biodiversity gains (detailed in the planning application) which include doubling the amount of hedgerow, improving the existing grassland and increasing the amount of existing wildlife habitat by 40%. Additional trees and hedges will be planted to provide screening.

2.20 If the application is approved, we aim to provide benefits for people living close by. The final details of these would be developed out of close discussion with local people which could include:

- Educational opportunities for schools and local residents to learn about renewable energy and sustainable solutions. For schools that might be wildlife or solar technology for example
- Further wildlife habitat improvement or creation, to support endangered or specific species
- Improving walking and cycling connections – including relocating the existing footpath within the site to create a better connection with Hawksbury Village Green and the wider area
- Facilitating schemes to enable local residents to benefit from solar technology
- Working with community groups and local organisations

2.21 As with all project procurement Coventry City Council encourages its suppliers to use and engage local companies as well as to provide apprenticeship opportunities.

Summary

2.22 The PACC process met the legislative and regulatory requirements and provided options for how interested parties engage with the Applicant. The public event was well attended and the online consultation also gathered feedback, both proving worthwhile from the Applicant's perspective in that feedback has influenced the Proposed Development, as outlined above.

3. Development Plan Policy & Other Material Considerations

3.1 This section summarises relevant development plan policy and other relevant material considerations, which together will form the policy basis for assessment of the planning application.

Legislative Context

3.2 The Town and Country Planning Act 1990 Section 70(2) states that:

"In dealing with such an application the authority shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations."

3.3 The Planning and Compulsory Purchase Act 2004 amends parts of the Town and Country Planning Act 1990. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

"If regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

3.4 The process for determining a planning application can be defined as:

- Identification and consideration of the key provisions within the Development Plan;
- Clarification of whether the Development is in accordance with the Development Plan;
- Identification and consideration of relevant material considerations; and
- Conclusions on whether planning permission is justified.

Development Plan

3.5 The development plan for the site comprises:

- For the CCC area, the Coventry City Council Local Plan 2011-31 (adopted 6 December 2017) (the "CCCLP"); and
- For the RBC area, the Rugby Borough Council Local Plan 2011-31 (adopted June 2019) (the "RBCLP").

Site Specific Policies

3.6 Proposals maps within the CCCLP and RBCLP both identify the site as part of a larger area of Green Belt, the following policies applying as a result:

- In the CCCLP, Policy GB1: Green Belt and Local Green Space, of which criterion 2A states: *"Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy."*

- In the RBCLP, Policy GP2: Settlement Hierarchy, which states: *"New development will be resisted; only where national policy on Green Belt allows will development be permitted."*

3.7 Both Local Plan policies essentially defer to national policy on development in the Green Belt, which is considered below.

General Development Policies

3.8 Topic-based environmental reports form part of the planning application documentation, each considering the Proposed Development in the context of relevant environment-related development plan policies. This Statement focusses upon site specific planning policies and defers to the accompanying environmental reports for assessment of specific environmental consideration in a policy context. Notwithstanding, Section 6 of this Statement applies a planning context to the conclusions of the environmental reports and their proposed mitigation measures, proposed appropriate control measures.

Other Material Considerations

3.9 This section summaries other material considerations of relevant to the assessment and determination of the planning application.

National Planning Policy Framework

Presumption in favour of sustainable development

3.10 The NPPF sets out the economic, environmental, and social planning policies for England. Central to these main themes is a presumption in favour of sustainable development, and that development should be planned positively. The objective of sustainable development is summarised at Paragraph 7 as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs.

3.11 In delivering sustainable development, three overarching objectives are identified for the planning system: economic; social; and and environmental (Paragraph 8). The environmental objective includes *"…mitigating and adapting to climate change including moving to a low carbon economy"*.

Renewable Energy

3.12 The NPPF is clear that planning has a key role in supporting renewable energy and associated infrastructure. Paragraph 152 proposes that the planning system should *"support the transition to a low carbon future in a changing climate"* and *"support renewable and low carbon energy and associated infrastructure."*

3.13 The NPPF is also clear that 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"* (Paragraph 158). Applications for renewable and low carbon development should be approved if the impacts are (or can be made) acceptable.

Environmental Considerations

3.14 In delivering sustainable development, the NPPF contains policies on several environmental issues, and is a material consideration in the determination of planning applications. Meeting the challenge of climate change is at the core of the NPPF and it sets out how planning plays an intrinsic role in supporting the delivery of renewable and low carbon energy developments.

Green Belt

3.15 Section 13 of the National Planning Policy Framework (2021) (NPPF) relates to the protection of Green Belt land. This states that the essential characteristics of Green Belts are their openness and permanence, and identifies the five purposes of the Green Belt as:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special characteristic of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.16 Paragraph 147 of NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 goes on to state that *"when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any harm resulting from the proposals, is clearly outweighed by other considerations."*

3.17 Paragraphs 149 and 150 lists cases where the construction of new buildings, and certain other forms of development would not be considered as inappropriate development. The application proposals for a solar farm do not fall within the list of exceptions and therefore represent inappropriate development in the Green Belt in policy terms.

Planning Practice Guidance on Green Belts (and associated case law)

3.18 Planning Practice Guidance (PPG) on Green Belts (22 July 2019) sets out factors to be taken into account when considering the potential impact of development on the openness of the Green Belt and identifies that assessing the impact on openness requires a judgement based on the circumstances of the case. These matters include, but are not limited to:

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

3.19 A Supreme Court Ruling (case: Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council) (2020) recently held that openness is also "a *matter not of legal principle but of planning judgement for the planning authority or the inspector.*"

Planning Practice Guidance – Renewable and Low Carbon Energy

3.20 The Renewable and Low Carbon Energy PPG4 details how the development of renewable energy can be properly and sensitively designed. Paragraph 13 provides specific guidance on the siting of ground-mounted solar farms, indicating in particular that developments should be adequately screened by existing and proposed vegetation to mitigate against potential impacts on local receptors from views of the project, glint and glare, and the setting of local heritage assets.

3.21 The RLCE PPG also highlights that, where solar farms are proposed on greenfield land, projects should be such that:

"(i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and
(ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays."

National Energy Policy

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

3.22 The National Policy Statement (NPS) on Renewable Energy Infrastructure (EN-3) was formally adopted in July 2011 and provides national planning policy in respect of renewable energy infrastructure.

3.23 Whilst EN-3 provides assessment and technology-specific information on certain renewable energy technologies it does not include solar PV development. Paragraph 1.8.2. explains the reasoning for this, i.e., at the time of drafting EN-3 which was published in 2011, the Government did not consider other forms of renewable energy generation to be viable over the relevant NSIP threshold, e.g. solar PV over 50 MW.

3.24 The Government published a revised Draft NPS for Renewable Energy Infrastructure (Draft EN-3) in September 2021. In contrast to the adopted 2011 NPS EN-3, the Draft EN-3 contains technology-specific information for solar photovoltaic generation. The emphasises that solar farms are the cheapest form of energy generation worldwide and that solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector.

3.25 The Draft EN-3 contains specific advice on environmental considerations for solar developments. Some of the key points of relevance to the determination of solar energy applications within the draft NPS are summarised as follows:

- The applicant *"may choose a site based on nearby available grid export capacity' and 'locating solar farms at places with grid connection capacity enables the applicant to maximise existing grid infrastructure, minimise disruption to local community infrastructure or biodiversity and reduce overall costs".* (2.48.12);
- It advises that where possible, solar developments should utilise agricultural land preferably of classification 3b, 4, and 5 (2.48.13);
- Applicants should *"consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges."* (2.51.6);
- It advises that Glint and Glare studies should focus on potential impacts on homes and motorists, rather than potential aviation impacts (2.52.5);

- With regard to archaeology, solar panels on concrete footings may in fact increase protection of below-ground archaeology as they would prevent regular ploughing. (2.53.2); and
- Micro-siting with specific tolerances is recommended as a way of mitigating archaeological impact during construction (2.53.6).

UK Renewable Energy Roadmap

3.26 The Roadmap identifies the NPSs as a potential means of improving the delivery of renewable energy development through their advice on need, mitigation and delivery in a sustainable manner.

3.27 A 2013 Update reports on the progress that has been made in the renewable energy sector since its publication, re-iterating Central Government's commitment to renewable energy (paragraph 1):

The Government strongly supports renewable energy as part of a diverse, low carbon and secure energy mix. Alongside gas, low-carbon transport fuels, nuclear power and carbon capture and storage, renewable energy offers the UK a wide range of benefits from economic growth, energy security and climate change perspective."

3.28 The Roadmap Update also recognises that a number of barriers continue to present challenges, including pre-consent delays.

3.29 The Roadmap Update also identifies that solar PV has the potential to form a significant part of the renewable energy generation mix and that solar received the highest public approval rating of all renewable energy technologies, at 82% in 2012 and 85% in 2013.

UK Solar PV Strategy Part 1: Road Map to a Brighter Future

3.30 Part 1 of the UK Solar PV Strategy ("the UKSPV Strategy") was published in October 2013 and sets out four guiding principles which form the basis of the Government's strategy for solar PV. These principles are:

- Support for solar PV should allow cost-effective projects to progress and to make a cost-effective contribution to UK carbon emission objectives in the context of overall energy goals;
- Support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity, and provide opportunities for local communities to influence decisions that affect them; and
- Support for solar PV should assess and respond to the impacts of deployment on: grid systems balancing; grid connectivity; and financial incentives.

3.31 Part 1 establishes the principles for solar PV deployment in the UK and states that solar PV can be deployed in a variety of locations, including on the ground on greenfield sites.

UK Solar PV Strategy Part 2: Delivering a Brighter Future

3.32 Part 2 of the UKSPV Strategy was published in April 2014 and focuses on the Government's ambition for the key market segments, how they will be realised through innovation and partnership and the benefits that this will bring for jobs and investment in the UK, in addition to vitally important emissions reduction.

3.33 Part 2 of the UKSPV Strategy recognises, in respect of ground mounted solar PV installations, the opportunities for greater clean energy generation and how solar farms can be beneficial for wildlife. Part 2 of the UKSPV Strategy also recognises there is a need for ground mounted solar projects to be well planned and screened and to avoid harm to biodiversity. It emphasises that innovation and clean energy are at the centre of the Government's economic plan. One of the key topics is the delivery of commercial and industrial onsite generation. With the falling costs due to technology innovation, there is an ambition for continuous growth in the solar PV capacity in line with the 2020 target for renewables.

Net Zero: The UK's Contribution to Stopping Global Warming

3.34 In May 2019 the Committee on Climate Change published Net Zero - The UK's Contribution to Stopping Global Warming. This report responds to a request from the Governments of the UK, Wales, and Scotland, asking the Committee to reassess the UK's long-term emissions targets. The report recommends a new target for the UK of net zero emissions by 2050. The Report highlights the falling cost of key renewable technologies including solar PV, which is now generally comparable or low cost than power from fossil fuels, while bringing significant co-benefits such as reduced air pollution.

3.35 On 27 June 2019, the Climate Change Act 2008 was amended to introduce a target for at least a 100% reduction in greenhouse gas emissions (compared to 1990 levels) in the UK by 2050. This 'net zero' target is likely to affect and increase future Government renewable and low carbon energy targets and create a more positive policy environment for solar energy.

Net Zero Strategy: Build Back Greener

3.36 The Government's Net Zero Strategy (the "GNZ Strategy"), published in advance of COP26, is the Government's long-term plan for the transition to a low carbon economy. The GNZ Strategy highlights the significant progress made since 1990 in reducing greenhouse gas emissions from the power sector and introduces an ambitious commitment to ensure that all electricity comes from low carbon sources by 2035, subject to security of supply.

3.37 The GNZ Strategy calls for the accelerated deployment of low-cost renewable generation and states that a low-cost net zero electricity system is likely to be composed predominantly of wind and solar generation. The GNZ Strategy emphasises that the planning system will play an important role in supporting the deployment of renewable energy.

2022 Committee on Climate Change Progress Report to Parliament

3.38 The CCC Progress Report to Parliament was published in June 2022 and provides a review of Government efforts over the previous 12 months with regards to Climate Change and presents recommendations for reducing emissions and adapting to climate change. UK emissions are noted to have risen by 4% in 2021 compared with 2020 as the economy began to recover from the COVID-19 pandemic.

3.39 The CCC Report notes that there remains significant opportunity to reduce fossil fuel consumption across the UK on a timescale that will allow the population to cope with continually rising prices, with deployment of renewable sources such as solar helping to improve energy efficiency levels. It is also noted that the annual amounts of renewable energy developments (including solar) entering construction will need to ramp up

significantly over the next decade in order for the government to meet installed capacity targets.

3.40 The contents of the report also indicate that solar deployment is on an upward trajectory, with ambitious growth targets alongside offshore wind, and less of a focus on onshore wind, in comparison to previous years. The Government has set out an expectation for a five-fold increase on currently installed solar capacity by 2035, which would equate to a total of 70 GW. It also committed to consult in 2022 on amending planning rules to strengthen policy in favour of development of ground-mounted solar on non-protected land.

3.41 There has been significant progress in the transition to renewables, with emissions in Scotland in particular, noted as having fallen by 50% between 2000 and 2020. However, the CCC report once again notes potential barriers to low-carbon generation at scale, including in the planning and consenting regime, which should be addressed urgently to enable the low carbon transition.

UK Sixth Carbon Budget

3.42 On 20 April 2021 the Department for Business, Energy and Industrial Strategy and Prime Minister's Office jointly announced that the Sixth Carbon Budget will limit further the volume of greenhouse gasses emitted over the 5-year period from 2033 to 2037. The UK Government is already working towards a reduction of 68% by 2030, and states that the goal of achieving 78% by 2035 compared with 1990 levels constitutes the world's most ambitious climate change target.

3.43 For the first time, the Carbon Budget will incorporate the UK's share of international aviation and shipping emissions. The statement also notes that the UK continues to break records in renewable energy generation, which has more than quadrupled since 2010, with low carbon electricity accounting for other 50% of total generation.

3.44 The Carbon Budget Order came into force on the 24th June 2021.

The UK's Integrated National Energy and Climate Plan

3.45 The UK draft National Energy and Climate Plan (NECP) was produced in January 2020 and sets out the UK Government's climate and energy objectives, targets, policies and measures covering the five dimensions of the Energy Union. The NECP highlights the role of advanced solar PV technologies in the delivery of cost efficient, clean and secure supplies of electricity.

Renewables, Recovery and Reaching Net Zero

3.46 The National Infrastructure Commission ('the NIC'), whose remit is to advise the Government on major long-term infrastructure challenges, published Renewables, Recovery and Reaching Net Zero in August 2020. The report states that delivering a "highly renewable electrical system is the best way to deliver low cost, low carbon electricity" and predicts that the demand for electricity in the UK will increase in the coming years. The NIC advises that in order to tackle the climate crisis and provide low-cost electricity for consumers, 65% of Britain's electricity should be provided by renewable sources by 2030. The report emphasizes the importance of ensuring that there is an energy generation mix of both wind and solar to effectively balance supply and demand throughout the day and across the year.

4. Key Issue 1: Energy Policy

4.1 Whilst the NPPF is clear that Applicants are not required to demonstrate the need for renewable energy developments, summary of national energy policy from paragraph xx clearly illustrates the significance of such developments in tackling climate change and delivering net zero. The role of solar farm development is clearly established as part of this long-term sustainable energy mix.

4.2 The Proposed Development is consistent with EN-3 in that:

- Proximity of available grid export capacity was a significant site selection consideration, as recognised by section 2.48.12 of EN-3;
- It utilises lower quality agricultural land;
- Landscape and visual impacts will be mitigated by appropriate planting; and
- Glint and glare studies and associated mitigation addresses impacts on motorists.

4.3 At the end of the operational lifespan of the solar development, the solar PV arrays and associated infrastructure will be removed and the Site will be fully restored. The Development will make use of the significant energy generating potential of the Site to provide low carbon energy.

4.4 The Proposed Development will make a substantial contribution to the overall supply of affordable low-carbon renewable energy, making a contribution to the aims of the Net Zero Strategy, Energy White Paper, UK Renewable Energy Roadmap, UK Solar PV Strategy, the UK's Integrated National Energy and Climate Plan and the legally binding Net Zero 2050 emissions target.

4.5 The UK Solar PV Strategy identifies a need for large-scale solar farms on greenfield sites, provided environmental considerations are given appropriate weight, as is the case with the Proposed Development. As acknowledged in the 2021 Committee on Climate Change Progress Report to Parliament, large-scale solar farms such as the Proposed Development will play an essential role in decarbonising the UK's energy supply.

5. Key Issue 2: Green Belt Policy

5.1 As outlined in paragraph 3.6, the application site lies within the defined Green Belt in both the CCCLP and the RBCLP.

5.2 CCCLP policy GB1 criteria 2A sets out that inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist and that development proposals in the Green Belt will be assessed in relation to the relevant national planning policy.

5.3 Similarly, RBCLP policy GP2 advises that within the Green Belt new development will be resisted and only where national policy on Green Belt allows will development be permitted.

5.4 Section 13 of the National Planning Policy Framework (2021) (NPPF) relates to the protection of Green Belt land. This states that the essential characteristics of Green Belts are their openness and permanence, and identifies the five purposes of the Green Belt as:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special characteristic of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.5 Paragraph 147 of NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 goes on to state that *"when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any harm resulting from the proposals, is clearly outweighed by other considerations."*

5.6 Paragraphs 149 and 150 lists cases where the construction of new buildings, and certain other forms of development would not be considered as inappropriate development. The application proposals for a solar farm do not fall within the list of exceptions and therefore represent inappropriate development in the Green Belt in policy terms.

5.7 Accordingly, this section of the planning statement assesses the effect of the proposal on the openness of, and purposes of including land within the Green Belt. It then considers whether the harm caused by the proposal, by virtue of being inappropriate development in the Green Belt, and any other harm identified, would be clearly outweighed by other considerations to result in 'very special circumstances'.

Impact of the proposal on the openness of the Green Belt

5.8 NPPF policy clearly states (para 137) that the fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open. The effect of the proposal on the openness of the green belt is a key issue in the consideration of this application.

5.9 Planning Practice Guidance (PPG) on Green Belts (22 July 2019) sets out factors to be taken into account when considering the potential impact of development on the openness of the Green Belt and identifies that assessing the impact on openness requires a judgement based on the circumstances of the case. These matters include, but are not limited to:

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

5.10 A Supreme Court Ruling (case: Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council) (2020) recently held that openness is also "a *matter not of legal principle but of planning judgement for the planning authority or the inspector.*"

5.11 The application site comprises three separate areas of land located to the south-east of Alderman's Green, on the north-eastern edge of Coventry. Two of these areas are located between the M6 and Lenton's Lane, separated by the Oxford Canal, and the third area is located between Shilton Lane and the slip road between the M6 and the M69. The site areas are generally flat to gently undulating farmland, contained by narrow belts of deciduous trees and hedgerows. The Oxford Canal passes through and alongside the site areas, and is followed by the Oxford Canal Walk long distance walking route.

5.12 The proposed solar farm will include rows of solar panels, access tracks, fencing and other security infrastructure, inverter cabinets and a control building. All existing trees on the site will be retained and protected. Some sections of hedgerow will be removed to allow access between fields, but elsewhere gaps in hedgerows will be infilled with new planting. New tree planting is proposed along the south side of Lenton's Lane to filter views into the site from Alderman's Green. Additional tree and hedgerow planting is also proposed around Lenton's Lane Farm, along the western boundary of Lenton's Lane Cemetery and along parts of the Oxford Canal, to filter views towards the proposed solar farm.

5.13 From a spatial perspective, it is accepted that the development would reduce openness by introducing a substantial number of solar panels onto previously undeveloped fields. However, the low nature of the solar panels will ensure that the structures are not dominant on the landscape and will thereby minimise the visual impact on the openness of the Green Belt. Existing features on the site also already detract from the perceived openness of the landscape including existing powerlines and pylons which cross the site and the backdrop of the M6 motorway.

5.14 The landscape and visual impact assessment prepared in support of the application identifies that the visual effects of the proposal are localised to the area within the site and its immediate surroundings and will not result in any significant effects. It finds that there will be some loss of views across the site however views of the solar farm will be partially filtered and minimised by existing hedgerows and vegetation and by proposed tree planting and landscaping which will also help to filter views of the solar farm (over the longer term) and reduce impact.

5.15 As noted above, PPG notes that the duration of development and the remediability to turn it back to its original state are key considerations when assessing impact on openness. Significantly, the proposed solar farm has an operational lifespan of approximately 40 years and after this period, it will be dismantled and the site returned to its previous condition for continued agricultural use. The proposals are therefore temporary and reversable in nature and will not lead to a permanent loss of openness. The harm to the openness of the Green Belt is moderated by the temporary and reversible nature of the development.

Impact of the proposals on the purposes of including land in the Green Belt

5.16 As outlined above, NPPF sets out five purposes of including land in the Green Belt. The impact of the proposals on these five purposes are considered in turn below.

Purpose 1 - To check the unrestricted sprawl of large built-up areas

5.17 The application site lies to the north of the M6 motorway, with the main urban area around the application site situated to the south of the motorway. The Green Belt boundary runs along the line of the motorway, which acts as a clear defensible boundary to prevent urban sprawl. The solar farm is a specialised temporary facility with a clear locational need at this location for grid connection and will not create a precedent for other forms of development. Accordingly, it is not considered that the proposals will contribute towards urban sprawl. Furthermore, the majority of the application site is bounded to the north by existing development along Lenton's lane, which forms a part of Alderman's Green. The proposals will not extend the urban area beyond this existing built development.

Purpose 2 - To prevent neighbouring towns merging into one another

5.18 The Proposed Development would not result in the merging of settlements. The development lies between the main built-up area of Coventry which lies principally to the south of the M6 and a small pocket of development at Lenton's lane which forms part of Alderman's Green. There are no towns or settlements in close proximity to the application proposals which would be merged as a result of the Proposed Development. A significant countryside gap is maintained between the southern part of the application site and the nearest settlement to the north, Ansty.

Purpose 3 - To assist in safeguarding the countryside from encroachment

5.19 The application site is existing agricultural fields. The proposals will alter the appearance of the fields through the placement of solar arrays and associated infrastructure. The proposals will therefore result in encroachment on the countryside, however, given commitments to decommission and restore the site, this is for a temporary period only and is not permanent. The development is proposed for a period of approximately 40 years only, after which the solar farm will be dismantled and the land returned to its former condition and agricultural use.

5.20 For the duration the solar farm is active, the development will assist in preventing encroachment on the Green Belt by other forms of development which could result in greater physical impact and permanency.

5.21 As a highly specialised facility which is intended to meet an identified need, the development will also not set a precedent for other types of development on the surrounding countryside.

Purpose 4 - To preserve the setting and special characteristic of historic towns;

5.22 The location of the Proposed Development will not have any impact on the setting or special character of any historic towns. There are no historic towns in close proximity to the application site and the Landscape and Visual Appraisal identifies that the visual effects of the proposals are localised to the area within the site and its immediate surroundings.

Purpose 5 -To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.23 The Proposed Development is not located on derelict or other urban land however there are specific locational needs for the choice of the site including the availability of sites of an appropriate size for a commercially viable solar development and the close proximity of the application site to grid connection with capacity.

5.24 In a recent solar farm appeal case (appeal ref: APP/W1525/W/22/3300222), the Inspector also concluded that he was unconvinced that the reuse of previously development land for such a scheme would secure the most efficient or optimum reuse of such land for a temporary period of time and a similar conclusion should also be reached in this case with regards to the appropriateness of a greenfield site.

5.25 Accordingly, the proposal is not in conflict with this purpose of the Green Belt.

Other effects

5.26 Before considering other considerations and very special circumstances below, it is necessary to consider any other harm arising from the proposals. The following effects have been identified in supporting assessments which accompany the proposals. These effects are summarised below and considered in greater detail throughout this statement.

5.27 The development will not result in the loss of grade 1 or 2 agricultural land. The site is grade 3 agricultural land which is classed as being good to moderate. After 40 years, the solar panels will be dismantled and the site returned to agricultural land, potentially at a higher grade given the “rest” in agricultural use.

5.28 The proposed scheme presents an opportunity to increase the ecological value of the Site for wildlife and will achieve Biodiversity Net Gain.

5.29 The landscape and visual impact assessment finds that landscape and visual effects are localised to the area within the site and its immediate surroundings.

5.30 Other impacts from supporting statements?

Other Considerations

5.31 As outlined above, para 147 of NPPF states that inappropriate development should not be approved except in very special circumstances. Other considerations which are relevant to the assessment of the proposals are set out below.

Renewable energy generation and contribution towards local and national carbon reduction targets

5.32 The UK Government has declared a climate emergency and set a statutory target of achieving net zero emissions by 2050. The current application must be viewed in the context of these Government targets and considerable weight should be given to the contribution the proposals will make to the production of energy from renewable sources.

5.33 National Policy Statements (NPS) for the delivery of major energy infrastructure are a material consideration in the determination of planning proposals for renewable energy and highlight the importance of renewable energy generation to meeting these net zero targets.

5.34 Draft NPS EN-3 Renewable Energy (September 2021) highlights that electricity generation from renewable sources of energy is an essential element of the transition to net zero and identifies that the government is committed to sustained growth in solar capacity (as a key part of the Government's strategy) to ensure that net zero emission targets are met. While solar farms are encouraged, the NPS nevertheless recognises that large scale solar developments will inevitably have impacts, particularly if sited in rural areas.

5.35 The Energy White Paper: Powering Our Net Zero Future (December 2020) further recognises that onshore wind and solar will be key building blocks of the future generation mix, alongside offshore wind and that there will need to be a sustained growth in the capacity of these sectors in the next decade.

5.36 At the local level, Coventry City Council and Rugby Borough Council have also both confirmed their commitment to tacking climate change. Coventry City Council Local Plan policy EM3 Renewable Energy Generation seeks to promote and encourage the installation of renewable and low carbon energy technology provided significant adverse impacts can be mitigated while in 2019 Rugby Borough Council declared a climate change emergency and highlighted its commitment to help to deliver the UK's carbon reduction targets.

5.37 National planning policy is clear that planning has an important role to play in supporting the delivery of new renewable and low carbon energy infrastructure. Paragraph 152 of NPPF states that *"the planning system should support the transition to a low carbon future in a changing climate…and support renewable and low carbon energy and associated infrastructure."* Paragraph 158 goes on to state that when determining planning applications for renewable or 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.

5.38 Paragraph 151 of NPPF relates specifically to renewable energy projects and recognises that many renewable energy projects will comprise inappropriate development where developers will need to demonstrate very special circumstances if projects are to proceed. NPPF states that *"such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources."*

5.39 The Proposed Development will provide a maximum output of 33MW and create an annual carbon saving of 7,080 tonnes of CO2 compared to traditional power generation. The

Proposed Development would therefore make a significant contribution towards increasing renewable energy regeneration in the area as sought by both national and local policy.

5.40 It is considered that very substantial positive weight should be accorded to the scale of generation of renewable energy and associated reduction in carbon emissions that the development will provide. These benefits of renewable energy generation raise substantial benefits in favour of the proposal and are fully supported by local and national policy as set out above. The delivery of these benefits is recognised in NPPF as potential very special circumstances and should therefore be given significant weight in the Green Belt planning balance.

Site selection and locational requirements

5.41 Solar farms are required to meet specific site selection and location requirements to ensure they are suitable for development. There are no preferable sites in the area of sufficient size for a commercially viable solar development and the application site has been chosen for its close proximity to a grid connection location with sufficient capacity, as well as being of a suitable size for a commercially liable solar development. There is therefore clear rationale for the chosen application site.

The Green Belt Balance

5.42 On the basis of the above, the application proposal would result in harm to the green belt by reason of inappropriateness and loss of openness. However, as set out above, it is considered that the level of harm is limited due to the following factors:

- The low horizontal nature of the solar farm minimises impact on openness;
- The development is temporary and reversible in nature and the solar farm will be dismantled after 40 years and the site will be returned to agricultural use;
- The landscape and visual assessment has identified limited landscape and visual effects which are localised to the area within the site and its immediate surroundings only; and
- The Proposed Development will not result in loss of Grade 1 or 2 agricultural land.

5.43 On the other hand, the proposed scheme will deliver significant benefits, most notably a renewable solar farm that would generate up to 33MW of renewable energy and save 7,080 tonnes of CO2. NPPF supports the provision of renewable energy developments to assist with Government energy targets and recognises that very special circumstances could include the wider environmental benefits associated with the increased production of energy from renewable sources. The growth of solar farms in particular are identified in Government policy as playing a vital role in growing renewable energy production.

5.44 While each planning application case has to be determined on its own individual merits, a number of solar developments have recently been approved by Councils/Inspectors on the basis that the benefits of renewable energy would outweigh the harm to the openness of the Green Belt.

5.45 It has also been demonstrated that the site meets locational restrictions being of a sufficient size for a commercially viable solar development and in close proximity to grid connection with capacity to justify its required location in the Green Belt.

5.46 It is considered that the benefits of the proposal, most notably the renewable energy generation amount to very special circumstances which should be given significant weight in the determination of the application. These benefits outweigh the limited harm to the Green Belt caused by inappropriateness and loss of openness and therefore very special circumstances exist in this case to justify the development.

5.47 Accordingly, the proposals accord fully with national Green Belt policies and local policies GB1 of the Coventry City Local Plan and Policy GP2 of the Rugby Borough Local Plan.

6. Key Issue 3: Environmental Considerations & Proposed Planning Conditions

6.1 The accompanying environmental reports assess the Proposed Development on a topic-by-topic basis and conclude, subject to several design- and construction-related mitigation measures, that impacts are acceptable.

Biodiversity Net Gain

6.2 A Biodiversity Net Gain Assessment proposes the following measures, which combined will deliver net gain:

- All defunct hedgerows will be enhanced with infill planting;
- All ponds on Site will be retained and enhanced;
- All grassland retained on Site will be enhanced to a lowland meadow habitat;
- All grassland beneath the solar arrays will be temporarily lost during the process of installation, and species-rich grassland created in its place post installation;
- Areas of bare ground and arable fields that are retained will be enhanced to lowland meadow grassland where feasible due to soil nutrient levels;
- Areas of bare ground and arable fields beneath the solar arrays that are lost, will be replaced with species-rich grassland; and
- All trees on Site will be retained as part of proposals.

6.3 The expected net gain will be equal to or in excess of locally set targets for biodiversity enhancements.

Proposed Planning Conditions

6.4 The Applicant commits to the recommended mitigation measures and proposes that suitably worded planning conditions as part of any forthcoming planning conditions, some requiring further planning authority approval prior to the commencement of construction activities, are sufficient planning controls.

6.5 Such planning conditions could require:

- Prior to the commencement of construction activity:
  - Confirmation of grid connection infrastructure;
  - Traffic Management Plan, including construction routes and details of construction laydown/welfare areas and construction programme;
  - Access Management Plan, showing retention of pedestrian and cycle access through and within the edges of the site;
  - Construction Management Plan, including noise and dust control measures;
  - Pre-construction ecology surveys;
- Prior to the installation of solar array panels:
  - Delivery of biodiversity net gain proposals;
  - Final details of control buildings;
  - Final details of fencing, CCTV and lighting proposals;

  - Final details of solar array layout and design, all based upon parameters established on the approved planning application drawings;
  - Landscaping scheme, including planting densities and species
  - Final operational access road design and hard landscaping;
- Prior to completion of energy generation;
  - Submission of a decommissioning and restoration plan.

6.6 The rationale for these mitigation measures is set out across the wider suite of environmental reports which form part of the planning application documentation.

7. Summary

7.1 The role of the Proposed Development in contributing to a long-term sustainable energy mix which delivers the Government's 2050 net zero objective is recognised throughout national planning and energy policy. Developments such as that proposed will help ensure the UK's energy demands are met in a way which minimises climate change and reduces reliance on finite resources.

7.2 It is acknowledged that the Proposed Development is located in the Green Belt and relevant policies within both the CCCLP and the RBCLP defer to national planning policy in consideration of the acceptability or otherwise of the Proposed Development in such a location. Whilst national policy establishes a presumption against development in Green Belt locations, it allows for very special circumstance exceptions. Very special circumstances, taking full account of national policy tests, are demonstrated within Section 5 of this Statement.

7.3 The final form of the Proposed Development has been shaped by engagement with the local community and other interested parties. Physical and online consultation events have resulted in changes to the Proposed Development to minimise impacts on its nearest neighbours, as well as maintaining access through and around the site.

7.4 The Applicant has "screened out" the need for EIA in respect of the Proposed Development. Notwithstanding, the potential environmental effects of the Proposed Development have been comprehensively assessed in a series of topic-based environmental reports. These reports conclude that, subject to the implementation of a series of design- and construction-related mitigation measures, the environmental effects of the Proposed Development are acceptable. This Statement, at Section 6, proposes a series of subject matters which will form the basis of planning conditions controlling the implementation of these mitigation measures.

Young Planning
& Energy Consenting

Grant Young
07969 737 838
grantyoung@youngplanning.com

Suite 29, 196 Rose Street,
Edinburgh, EH2 4AT
www.youngplanning.com

Registered in Scotland:
SC537185