



# **Planning Statement**

# Ford Oaks Solar & Green Infrastructure Facility

# Taiyo Power & Storage Ltd

CRM.3025.001.PL.R.001.A

'Experience and expertise working in union'







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# **Planning Statement**

Project:	CRM.3025.001
For:	Taiyo Power & Storage Ltd
Status:	FINAL
Date:	May 2022
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# **1.0 Introduction**

# 1.1 Introduction

- 1.1.1 Enzygo Ltd have been instructed by Taiyo Power & Storage Ltd, to submit a full planning application for the construction and operation of ground mounted Solar (c.29ha) & Green Infrastructure (c.45ha) Facility on land to the west and south of Marsh Green near Exeter, EX5 2EU
- 1.1.2 The proposed development will provide renewable energy, from species-rich grassland, equivalent to the c.37,000MWh consumed by 18,500 homes across the EX5 2 postcode area in 2020.
- 1.1.3 The scheme also presents extensive green infrastructure of woodland, wet meadow, stream and hedgerow ecological habitat and corridor enhancements and landscape planting across the site and is aiming to be the first Solar Scheme in the UK which successfully achieves the Building with Nature accreditation.

# 1.2 Context

- 1.2.1 The International Policy Framework recognises the urgency in significantly reducing greenhouse gas emissions (Kyoto Protocol, 2005) and the UK, along with other EU countries, has signed up to the EU Renewable Directive. The Directive stated that 80% of the UK energy consumption should be generated from renewable energy by 2050.
- 1.2.2 To rapidly address the impacts of climate change, a national climate change emergency was declared by the UK Parliament in May 2019. MPs called on the Government to make changes that included setting a new target of reaching net zero emissions before 2050. On June 27th, 2019, the UK Parliament approved the net zero target in law, thereby changing the original target of 80% reduction of greenhouse gas emissions (compared to 1990) in the UK to 2050 to 100%.
- 1.2.3 In October 2021 the Government published the Net Zero Strategy which sets out the government's strategy for progressing to net zero. This includes the targets that by 2035 the UK will be powered entirely by clean energy. Solar energy will be a critical strand to achieve this ambitious target.
- 1.2.4 The April 2022 Energy Security Strategy announced both a 2030 ambition of a four-fold raising of UK installed solar power from 14GW to 70GW; and a consultation to change Planning Policy to be more in favour of ground and roof mounted solar energy installations.
- 1.2.5 The international and national policy framework is reflected in the National Planning Policy Framework (2021) paragraph 158, part a) which states local planning authorities should:

'not require applicants to demonstrate the overall need for renewable or low energy carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.'

1.2.6 On the 10th July 2019, East Devon District Council declared a 'climate emergency' in recognition of the need to take urgent action in respect of climate change. The Council published a Climate Change Action Plan (2020-2040), which included aspirations to become a net-carbon neutral authority.



- 1.2.7 Whilst the increased world focus on renewable clean energy is being recognised now more than at any other time, recent world events and ever-increasing energy costs have further highlighted the need for a security of a local energy supply.
- 1.2.8 The proposed development seeks to provide renewable energy which will make a step towards achieving local low carbon renewable energy.
- 1.2.9 The proposed development also provides the UK with additional energy security.

# **1.3** Summary of Development

- 1.3.1 The proposed development consists of approximately 74 hectares of land which consists of:
  - c.29 hectares of fenced solar arrays with species-rich grassland, plus associated infrastructure (such as transformers, substations and internal roads both inside and outside the fenced land parcels);
  - c.26 further hectares of enhanced species-rich grassland and stream habitats within the fences;
  - c.19 hectares of dedicated woodland, wet meadow, stream and hedgerow ecological habitat and corridor enhancements and landscape planting; outside the fences yet within the development boundary.
  - The Proposal also includes a community fund whereby community groups can apply for funding of community led projects.
- 1.3.2 Planning Permission is sought for a temporary period of 40 years from the date of first exportation of electricity from the site.
- 1.3.3 The Planning Application also includes a construction traffic reception site which is required for a temporary period of 1 year. It is approximately 1.26 hectares in area and will be used for the assembling of construction traffic (prior to escorted convoy to the development site). The only temporary buildings on this site will be the welfare cabin and reception office.

# 1.4 The Applicant

- 1.4.1 Taiyo Power and Storage Ltd is a partnership made up of Kajima Partnerships Ltd and Low Carbon Alliance, a professional Chartered Surveying and Engineering Consultancy which specialises in energy performance and property.
- 1.4.2 Low Carbon Alliance have a proven track record of improving the energy efficiency and providing renewable energy schemes.
- 1.4.3 Building on the Low Carbon Alliance's track record of providing engineering and energy advice in the property sector, Kajima Partnerships Ltd is building a significant pipeline of new, subsidy-free solar, battery and other renewable energy projects. Kajima Partnership Ltd seek to build long-term relationships with landowners to deliver high quality renewable energy and power storage projects that provide diversified rural income sources and enhance biodiversity and the local environment.
- 1.4.4 The land is in ownership of Devon County Council and two private landowners.



# **1.5** Purpose of Planning Statement

- 1.5.1 This Planning Statement (PS) introduces the planning application documents and describes the reason for the planning application.
- 1.5.2 The Statement summarises the main elements of the Proposed Development and considers the proposals in the context of national planning policy, the development plan and other material considerations.

#### **1.6** Format of the submission

- 1.6.1 The Proposed Development consists of 27 field parcels (not all of these are identified for solar array development) which have all been provided with a field reference number for identification purposes.
- 1.6.2 This Planning Submission has split the development area into three parts as follows:
  - Northern Area: This includes the land between the A30 to Westcott Lane and includes a total of 16 field parcels.
  - **Southern Area**: This includes the land between Westcott Lane and fields to the North and South of Withybed Lane. This includes a total of 6 field parcels.
  - **Eastern Area**: This includes the land to the east of Quarter Mile Lane and includes 7 field parcels.
- 1.6.3 These areas are referenced on Field Plan CRM3025.001.PL.D.004.
- 1.6.4 The planning application also consists of a temporary Reception Compound for construction traffic, located at to the south of Exeter airport and is approximately 4km from the main development site.
- 1.6.5 It is highlighted that these 'areas' are used only to aid description. The application site consists of one complete scheme.

# 1.7 Planning Application Validation Requirements

- 1.7.1 The Planning Application is supported by this Planning Statement and a number of additional reports detailed in Table 1.1 below.
- 1.7.2 The Planning Application Drawings are referenced in Table 1.2 below, the scaling of which has been agreed with East Devon District Council as part of the Pre-Application discussions.



Technical Assessment	Reference
Completed application forms and certificates	PP-11230316
Planning Statement (PS)	This Document Ref CRM.3025.001.PL.R.001
Appendix A to PS	Screening Request
Appendix B to PS	Screening Opinion
Appendix C to PS	Pre Application Response
Design and Access Statement	CRM.3025.001.PL.R.002
Statement of Community Involvement	CRM.3025.001.PL.R.003
Flood Risk Assessment and Detailed Drainage Design	CRM.3025.001.HY.R.001
Geo-environmental Preliminary Risk Assessment	CRM.3025.001.GE.R.001
Landscape and Visual Impact Assessment and Landscaping and Planting Schedule	035 110 FORD OAKS SOLAR LVIA
Ecological Impact Assessment and Biodiversity Net Gain	21/3754.02
Arboricultural Impact Assessment	J000245
Transport Statement (TS) & Outline Construction Transport Management Plan	DV5045/PD
Heritage Impact Assessment including Archaeological Desk Based Assessment and targeted Geophysics survey and Report	P00100.02
Agricultural Land Classification	SES/EG/MGF/#1
Glint and Glare Assessment	10705

Table 1.1: List of Reports



Drawing Reference	Drawing Title
CRM3025.001.PL.D.001	Proposed Location Plan
CRM3025.001.PL.D.002	Proposed Planning Boundary (Reception Site)
CRM3025.001.PL.D.003	Proposed Planning Boundary (Main Site)
CRM3025.001.PL.D.004	Field Reference Plan
CRM3025.001.PL.D.005	Topographical Survey
CRM3025.001.PL.D.006	Topographical Survey (Reception Site)
CRM3025.001.PL.D.007	Topographical Survey (Northern Fields)
CRM3025.001.PL.D.008	Topographical Survey (Southern Fields)
CRM3025.001.PL.D.009	Topographical Survey (Eastern Fields)
TPS FO 001 001	Proposed Development Plan
CRM3025.001.PL.D.010	Proposed Development Plan (Reception Site)
TPS FO 001 002	Proposed Development Plan (Northern Fields)
TPS FO 001 003	Proposed Development Plan (Southern Fields)
TPS FO 001 004	Proposed Development Plan (Eastern Fields)
TPS FO 001 005	Construction Phase Plan (Northern Fields)
TPS FO 001 006	Construction Phase Plan (Southern Fields)
TPS FO 001 007	Construction Phase Plan (Eastern Fields)
LOA1001-200.1C	PV Array Details (2 portrait)
LOA1001-200.2C	PV Array Details (3 portrait)
LOA1001-208C	Transformer Details
LOA1001-209C	Substation Details
LOA1001-215C	CCTV Details
LOA1001-214D	Fence & Security Gate Section Details
LOA1001-214i	Fence & Fence Gate Section
LOA1001-212C	Spare Parts Details
CRM.3025.001.HY.D.012.A	Drainage Plan
DV5045 PD-10 (Contained within TS)	Proposed Construction Phase – access and internal roads
DV5045PD-001 (Contained within TS)	Review of Existing Local Highway Network
DV5045PD-002 (Contained within TS)	Proposed Construction Routing on Local Roads
DV5045PD-003 (Contained within TS)	Proposed Construction Routing to Principal Roads
DV5045PD-004 (Contained within TS)	Proposed Holding Compound Routing Plan
DV5045PD-005 (Contained within TS)	Off-site Temporary Improvements
J000245 (Contained within arboriculture report)	Tree Constraints Plan
J000245 (Contained within arboriculture report)	Tree Protection Plan
Contained within LVIA	Landscape Character and designations
Contained within LVIA	Zone of theoretical Visibility
Contained within LVIA	Viewpoint Location Plan
Contained within LVIA	Zone of Visual Influence
Contained within LVIA	Viewpoint Plans (no. & location to be confirmed and agreed with Council)



035 220	Landscape Plan
Contained within Ecological Appraisal	EMMP
Contained within Ecological Appraisal	EMMP (Northern Fields)
Contained within Ecological Appraisal	EMMP (Southern Fields)
Contained within Ecological Appraisal	EMMP (Eastern Fields)

Table 1.2: Drawings



# 2.0 Pre-Submission Consultation

# 2.1 Introduction

2.1.1 The development proposal has undergone extensive statutory and non-statutory pre application consultation which is described below and set out in more detail within the Statement of Community Involvement.

## 2.2 Environmental Impact Assessment Regulations

- 2.2.1 A Request for a Screening Opinion under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 was submitted to East Devon District Council (EDDC) on the 26<sup>th</sup> November 2021 and is included in Appendix A of this Planning Statement.
- 2.2.2 The Screening Request assessed the scheme using the Screening Matrix and concluded that:
  - The site is not within a 'sensitive area' as defined by regulation 2(1) of the Environmental Impact Assessment Regulations 2017 (as amended);
  - Although a major development, the environmental impact would be no more than of local significance;
  - The development proposed is not, in itself, environmentally sensitive or located in an environmentally sensitive area; and,
  - The development would not result in unusually complex or potentially hazardous environmental effects.
- 2.2.3 The Screening request concluded that, whilst there may be some effects upon the environment as a consequence of the proposed development, these effects will be local in nature and can be appropriately managed through the design of the site and with the adoption of best practice measures.
- 2.2.4 It was therefore concluded that the proposed development does not constitute EIA Development.
- 2.2.5 The Screening Opinion from EDDC was received on the 16<sup>th</sup> December 2021 and confirmed that there would not be a requirement for the development proposal to be subject to a formal Environmental Impact Assessment (Appendix B).

# 2.3 Pre-Application Request with East Devon District Council

- 2.3.1 The applicant has engaged in the formal pre-application process with EDDC (reference: 21/0155/PREAPP).
- 2.3.2 On the 28<sup>th</sup> January 2022 a pre-application advice meeting was held between the applicant, Enzygo Ltd (agent), Devon Wildlife Trust (Ecology Consultant) and EDDC Planning and Landscape Officers.
- 2.3.3 Following the pre-application meeting, a formal pre-application response was issued on 28<sup>th</sup> February 2022 and is contained within Appendix C of this Planning Statement.
- 2.3.4 The pre-application advice response summary stated the following:



- Whilst the site is within the open countryside, there is support for a large-scale solar facility within the NPPF. The response also recognised that Strategy 39 of the East Devon Local Plan supports the principle of renewable or low carbon energy projects subject to them following current best practice guidance and the proposal addressing any adverse impacts on features of environmental and heritage sensitivity, including any cumulative landscape and visual impacts.
- Introducing a solar facility of this size and scale would have a significant impact on the rural landscape character of the area with localised harm arising from views of the development from the surrounding rural roads, through field gates and public footpaths in the area and from the A30. Whilst the site is not the subject of any national or local landscape designations it is rural in character and therefore sensitive to change from this proposal. The visual harm from the proposal would weigh against the proposal within the overall planning balance.
- Any forthcoming planning application would need to give careful consideration to the impact of the solar farm on the setting and significance of heritage assets in the vicinity of the site and should be informed by a detailed heritage impact assessment.
- The letter also included a detailed scope for each of the technical assessments required to be submitted as part of any planning application.
- 2.3.5 A subsequent pre-application meeting was held with the Planning and Landscape Team at East Devon District Council on the 8<sup>th</sup> March 2022.
- 2.3.6 In addition to the formal pre-application process, technical disciplines have consulted with their counterparts within EDDC to scope the assessment work. Details of these consultations are provided within the relevant technical reports.

# 2.4 Consultation with Community

- 2.4.1 The design of the Solar and Green Infrastructure Facility has been an iterative process which has included consultation with the following groups:
  - Devon County Council Assets Department on the 3<sup>rd</sup> June 2021.
  - A project briefing to the Leader of Devon County Council mid June 2021.
  - A presentation to the Devon County Farms Committee on the 27<sup>th</sup> September 2021.
  - A presentation to Rockbeare Parish Council, with County and District Councillors, on the 27<sup>th</sup> October 2021.
  - A presentation to Aylesbeare Parish Council on the 3<sup>rd</sup> November 2021. In attendance was a Councillor from East Devon District Council.
  - A site walkover with residents on the 18<sup>th</sup> November 2021.
  - A site walkover with the Chairmen and Clerks of Aylesbeare and Rockbeare Parish Councils, DCC Area Highways Officer (Aylesbeare area) and DCC PROW researcher on 5<sup>th</sup> January 2022.
  - Attendance at the Rockbeare Parish Council Extraordinary meeting on the 2<sup>nd</sup> February at the Hampton by Hilton hotel near Exeter Airport.



- 2.4.2 A dedicated website including feedback form was launched in December 2021.
- 2.4.3 The applicant is committed to continuing post submission engagement with the local community and intends to continue attendance at Parish Council meetings during this time.



# **3.0** The Site and Surroundings

# 3.1 Location

- 3.1.1 The site is located approximately 6.5km east of Exeter to the west and south of Marsh Green in East Devon at postcode EX5 2EU and is centred on National Grid Reference (NGR) 303651, 93483 (site location plan CRM.3025.001.PL.D.001).
- 3.1.2 The construction traffic Reception Compound is located on land off Bishop's Court Lane, Clyst Honiton in East Devon at postcode EX5 2HN (centred at grid reference SX 99063 93002), to the immediate southwest of Exeter airport (site location plan 3025.001.PLD.001).

# 3.2 Proposed Development Site

## Context

- 3.2.1 The Red Line Boundary Plans (ref CRM.3025.001.PL.D.002 and CRM.3025.001.PL.D.003) identify the proposed development areas.
- 3.2.2 The development site is approximately 74 hectares and consists of distinct agricultural field parcels which all feature hedgerow boundaries interspersed with, mainly oak and ash trees.
- 3.2.3 The site comprises of a shallow valley, rising in the north towards the A30, dropping towards a water course 'Ford Stream' in the middle of the site just north of Westcott Lane, before rising to the southern land parcels.
- 3.2.4 The A30 forms the northern and western boundary of the site, creating a strong urbanising influence on the wider landscape. Large electricity pylons bisect the site from north to south and east to west, further detracting from the rural character of the site.
- 3.2.5 The nearest settlements to the site are the small hamlet of Westcott, located immediately to the west of the site and the village of Marsh Green which borders the site to the northeast.
- 3.2.6 Further afield lies the village of Aylesbeare which is approximately 0.75km to the south of the site. To the east, the settlement edge of West Hill is approximately 2km from the site boundary beyond which is the larger settlements of Ottery St Mary approximately 6km from the site. Approximately 3.9km to the west of the site is Exeter International Airport.
- 3.2.7 The closet designated assets are:
  - Rockbeare Manor, a grade II listed building and registered park and garden, separated from the site by the A30, approximately 0.5km north of the development.
  - The East Devon Area of Outstanding Natural Beauty sits approximately 1.2km to the east of the development site.
  - Immediately west and east of the southern land parcels are the County Wildlife Sites at Beautiport Farm and Withybed Copse.
- 3.2.8 The construction traffic Reception Compound is approximately 1.26 hectares and is located adjacent to the south west of runway 08 of Exeter Airport. The site is accessed from the B3184 which crosses the A30 north of the site.
- 3.2.9 The site consists of an agricultural field surrounded by hedgerow interspersed with trees.



# **Development Areas**

- 3.2.10 As described in chapter 1 of this Planning Statement, the development footprint has been split into 3 proposed development areas (for ease of reference) and a temporary Construction Reception Site.
- 3.2.11 This section of the Planning Statement briefly describes each field parcel. The relevant plans include the Topographical Survey Plans (ref CRM3025.001.PLD.005 to CRM3025.001.PLD.009).

## Northern Area

3.2.12 The northern area is located to the south and east of the A30 dual carriageway and north of Westcott Lane. The eastern boundary is bordered by Quarter Mile Lane and the hamlet of Marsh Green. The western boundary consists of agricultural fields and the hamlet of Westcott.



Figure 3.1: Northern Fields

3.2.13	The Northern Area	consists of app	roximately 16	fields which a	re referenced below:

Field	Existing Landuse	Access	Average
Reference			Gradient
	This is a large open field used as agricultural land bordered	Access to the	1:34 to 1:44
	by hedgerows interspersed with trees. To the west and	field is via a	
	north is the A30 dual carriageway. Rockbeare Lane, serving	gateway	
DC01	Marsh Green crosses over the A30 just to the north of the	off Rockbeare	
	field and continues south-east and forms the north eastern	Lane.	
	boundary of the field.		



Field	Existing Landuse	Access	Average
Reference			Gradient
	The field is divided into 2 areas. DC01a is adjacent to the		
	A30 and a larger area DC01b lies to the east. There is a line		
	of 4 trees crossing the field that demark the boundary		
	between DC01a and DC01b.		
	A large steel pylon sits in DC01b and dominates the		
	plateau ridge and view over the A30 bridge travelling to		
	Marsh Green. High voltage electricity cables cross field		
	DC01b from NNE to SSW and extend south through fields		
	D15, D10, G0, G5, G4, D5, D4 and D3.		
	Access onto the field is via gate off the Rockheare Lane to		
	the north approximately 125m from the bridge over the		
	A30, where there are overhead power cables.		
	Another line of overhead power cables run along the		
	hedgerow on the south side of DC01b lead down to field		
	DC02 and DC03.		
	A wooden telegraph pole is present at the field gate		
	access.		
	This field lies adjacent to the A30 dual carriageway and	Accessed from	1:15
	Immediately to the south-west of DCU1a. The agricultural	DC01.	
	and is bordered largely by nedgerows interspersed with		
	the north past corport of the field and a broken line of		
	mature trees runs through the centre of the site		
DC02			
	Two overhead powerlines cross through the west and		
	south side of the field. The former runs south between		
	fields DC03 and DC04 and then along the west side of field		
	D2b.		
Grassland	Between DC02 and DC03 there is a strip of wet grassland,	Access outside	-
wet strip	under which run field drains.	the fence via	
F		DC01 and DC02.	
	This field is damp pasture and is surrounded by hedgerow	Access is from	1:60 to 1:75
DC02	Interspersed with mature trees. It is separated from DC02	Rockbeare Lane,	
DC03	by a 30m wide strip of grassland	outside the	
	There are 2 overhead power collectricities the power of	western DC01 &	
	nere are 2 overnead power cables tringing the north and	fonco	
	This field is pasture grassland affect from DC02 but a 40m	Access to the	1.40
	This field is pasture grassiand offset from DCU2 by a 40m	Access to the	1:43
DC04	defined by bedgerow and mature trees	throughDC02	
	denned by nedgerow and mature trees.		



Field	Existing Landuse	Access	Average
Reference			Gradient
	There is a line of overhead power cable along the west		
	field boundary next to DC03.		
	The field is used as pasture grassland bordered by mature	The construction	1:51
	hedgerows and interspersed mature trees.	access gate is off	
אח		Westcott Lane,	
00		the operational	
		access is through	
		field D9.	
	This pasture field is used for grazing with Ford Stream	Access gate off	1:39
	flowing through the middle of the field from under Quarter	Quarter Mile	
	Mile Lane westwards. The field has a mature hedgerow	Lane about 400m	
D9	and tree belt along its southern boundary. The western	south of Marsh	
	and northern boundaries consist of hedgerow whist the	Green.	
	eastern boundary is a mature high hedgerow bordering		
	Quarter Mile Lane.		
	A narrow east-west oriented paddock north of D8, west of	Access gate from	1:51
	D9, East of G5 and south of G6.	D9.	
"Pistol"			
	A pasture field used to graze livestock. Ford Stream flows		
	along east to west at the base of the southern hedgerow.		
	This area encompasses old field boundaries to the west of	Construction and	1:21 to 1:26
	Marsh Green Farm which comprise pasture grassland.	decommissioning	
	Mature hedgerows and trees exist in parts around and	access is through	
	across the site.	an existing field	
		gate on Quarter	
D14		Mile Lane and	
		through Marsh	
		Green farmyard.	
		Maintenance	
		access is from	
	This field is pacture grassland surrounded by mature		1.14 to 1.20
	hodgorow interconcread with troos. There is a connice at		1.14 (0 1.50
	the porth west of the field adjoining fields DC01a and	DC01.	
D15	A large steel pylon exists near the boundary between D15		
015	and D15a dominating the skyline on this northern ridge of		
	the valley and high voltage power cables cross the field		
	from NNF to SSW		
	A second overhead power line crosses at the porth-west		
	corner of the site near to the connice		
	This field is nasture grassland and lies south of field D15a	Access is via D15	1.34
	and east of DC04. It is surrounded by mature bedgerows		1.07
D16	and with a tree belt along the western hedgerow. There is		
	an oak tree in the centre of the field. The overhead high		



Field Reference	Existing Landuse	Access	Average Gradient
	voltage power lines cross over the south-east corner of the field.		
D17	This field is bounded by Rockbeare Lane road to the east and DC01b to the north, and D15 to the west. It is pasture grassland bordered by mature hedgerows interspersed with trees. There is an oak tree within the field. Overhead power lines fringe the north-west corner of the field.	The field is accessed from D15.	1:17
D18	This pasture grassland field is south of D15, west of D14 and east of D16, surrounded by mature hedgerows interspersed with occasional mature trees	The field is accessed from D16.	1:34
G4	This area is an elongated field immediately to the north of Westcott Lane. It is grassland for livestock and is surrounded by a hedgerow with a few trees on the west and east boundaries. It abuts field G5 where there is a watercourse (Ford Stream). Various tracks cross the area leading from a field entrance at the south-west corner. High voltage overhead power cables cross the valley bottom from north to south passing through the east part of the field.	Access gate off Westcott Lane.	1:23
G5	This field is pasture grassland and lies immediately north of field G4. A mature hedgerow exists along the north and east sides of the field with a few trees. There is a shallow ditch, Ford Stream and field G4 beyond to the south. There is a high electricity steel pylon which dominates the valley bottom and high voltage power cables pass across the valley north to south passing over the hedgerow and gateway between fields G5 and G6. A well-used livestock track crosses the field from an access point through the hedgerow about the middle of the east boundary	Access along the northern hedgerow from G4.	1:41
G6	This field is pasture grassland and is surrounded by mature hedgerows and a few interspersed trees. There is a large steel pylon near the middle of the west side of the field which dominates the valley and overhead high voltage power cables extend south along the boundary with field G5. Livestock tracks cross the field from a gate at the south- west corner of the field to the middle of the west boundary with G5.	Access from G5.	1:35

Table 3.1



#### Southern Area

- 3.2.14 The Southern Area is located to the south of Westcott Lane and includes the field parcels which lie to the north and south of Withybed Lane. Further south are a number of agricultural fields and farmhouses.
- 3.2.15 To the east is Quarter Mile Lane and agricultural fields, whilst the western boundary consists of an agricultural field, beyond which is Public Right of Way which can be accessed off Withybed Lane.



Figure 3.2: Southern Fields

3.2.16 The Southern Area consists of 6 fields which are referenced below:

Field	Existing Landuse	Access	Average
Reference			Gradient
	The field is pasture grassland to the south Withybed Lane.	The gate off	1:13 and
		Withybed	1:24
	The field is surrounded by mature hedgerows and trees.	Lane.	
	There are a few trees within the field that possibly indicate a		
	former old field boundary. A hollow exists in the south-west of		
	the field.		
	Power cables cross the west side of the field.		
D2			
	A disused barn is located adjacent to the Withybed Lane		
	gateway		
	Succurry		
	There are gateways under the nower cables at the north-west		
	corner of the field from field D1 and also leading into field D2		
	parallel with the adjacent Withybed Lane.		
50	The field is agricultural land bounded to the north by Withybed	The	1:16 and
50	Lane.	construction	1:32



Field	Existing Landuse	Access	Average
Reference			Gradient
	It is bordered by mature hedgerows and trees and there is a small coppice and pond in the southeast of the field. A large steel pylon dominates this southern ridge from the SE corner with the high voltage power cables running North- South across the east side of the field.	phase welfare area access gate is at the north-east corner of the field from Withybed Lane. Operational	
		access from	
D4	This field comprises pasture grassland to the north of Withybed Lane, opposite to field D3. It is bordered by hedgerows and a few trees along its north and east sides. There is a high electricity steel pylon just beyond the north field boundary which dominates the skyline from the valley below and overhead power lines extend north across the valley and South along the west hedgerow of the field. A well-used livestock track crosses field diagonally from a gated entrance at the south-west corner leading to a gate in the southeast corner into D6.	Access gate off Withybed Lane.	1:12 to 1:20
D5	This field consists of pasture grassland bordered by hedgerows and a few trees to the south and east. Westcott Lane is adjacent to the north field boundary. There is a gated track from the lane onto the field. There is a gateway into the lower part of D6 on the east boundary. There is an electricity pylon in the south-west corner of the site and overhead power cables extend north near the west field boundary.	Through gate off D6	1:14
D6	This field is used as pasture grassland lies to the east of field D5. It is bounded by hedgerows and a few trees. The southwest corner of the field has a gate with field D4 whilst the southeast corner gate is onto Withybed Lane	The northern field parcel is accessible from D7. Sothern field parcel from Withybed Lane.	1:11
D7	This field lies to the south of Westcott Lane and west of Quarter Mile Lane about 600m south from Marsh Green. It is used as pasture grassland and bordered in part by hedgerows	The access gate junction of	1:19 to 1:26



Field Reference	Existing Landuse	Access	Average Gradient
	and trees. A mature hedgerow crosses the field from north to	Westcott	
	south.	Lane.	
	There is a well-defined livestock track from the junction of		
	Westcott Lane and Quarter Mile Lane at the north-east corner		
	of the field that crosses the mature hedgerow near the middle		
	of the field.		

#### Table 3.2

#### Eastern Area

- 3.2.17 The Eastern Area of land is located to the east of Quarter Mile Lane and west of Houndbeare Lane (and solar facility).
- 3.2.18 The northern extent consists of a drovers Road which starts south of the village of Marsh Green.
- 3.2.19 The southern extent consists of a second Drovers Road, whilst further south is WithyBed Copse and Withybed Lane.



Figure 3.3: Eastern Fields

3.2.20 The eastern area consists of 7 fields which are referenced below:





Field	Existing Landuse	Access	Average
Reference			Gradient
	This field consists of pasture grassland and is surrounded by	Access	1:45
	mature hedgerows. The south-east side of the field is flanked	onto the	
	by trees along a Drovers Road. To the north-west is an open	field from	
D10	field adjacent to Marsh Green Farm. Houndbeare Lane lies to	Quarter	
	the north-east.	Mile Lane.	
		Access	1:45
		onto the	
		field is via	
		a gate	
		from	
		Quarter	
		Mile Lane.	
	This field consists of pasture grassland bordered by	Access to	1:34
	nedgerows and a few mature trees. There are 2 trees within	the site is	
	the field. Houndbeare Lane lies to the north-east.	via	
	There is a gated access through the hedgerow at the west	fields to	
D11	corpor of the field joining field D12	the west	
DII		and via	
	On the east side of the site, there is a nond that drains and		
	forms a small watercourse that seeps into the ground at a	012.	
	line of trees to the west.		
	This field lies immediately south of field D11 and is pasture	Access is	1:30
	grassland. It is surrounded by mature hedgerows with a few	via the	
	trees on the east side of the field.	Drovers	
		Road along	
		the side of	
		field D10	
		into a gate	
D12		at the west	
		corner of	
		the field.	
		There is	
		also a gate	
		from the	
		of D10	
	This field consists of pasture grassland which is surrounded		1.25
	hy hedgerows and mature trees along its south-west	made into	1.23
	boundary. There is dense woodland to the south-east of the	the field	
	field.	from the	
D13	From the upper catchment hills to the south east. Ford	Drovers	
	Stream flows along the south and south-west side of the field	Road that	
	and drains towards New Ford Farm to the north-west. There	terminates	
		at the	



Field	Existing Landuse	Access	Average
Reference			Gradient
	are a few small ponds at 2 locations on the east boundary of	north	
	the field.	corner of	
		the field.	
Ecological	Two sloping pasture fields with a pond and spring adjacent to	Access	-
Enhancement	the County Wildlife Site Withybed Copse	from A13	
Area			

Table 3.3



#### Westcott Lane

- 3.2.21 Westcott Lane intersects the development site and is accessed from Quarter Mile Lane to the east and connects with Withybed Lane and Rag Lane to the west.
- 3.2.22 The lane has previously been used as a public highway, however the road was closed by Devon County Council following flood damage to the condition of the road. Devon County Council have confirmed (pers. comm. 5<sup>th</sup> January 2022) that there is no intention to reopen this road as a public highway.



Figure 3.4: Junction of Westcott Lane and Quarter Mile Lane

# **Construction Reception Compound**

- 3.2.23 The construction traffic Reception Compound is bordered by a band of vegetation to the north before leading to the A30. Bishop's Court Lane runs along the eastern and southern boundary and is bordered by a farm track to the west, with agricultural fields beyond. Marlborough Cottages lies to the northwest of the site.
- 3.2.24 The north part of the site lies at approximately 18.1mAOD rising to 24.10mAOD at the sites access.



Figure 3.5 (above) Site Location Plan



Figure 3.6 (above) Photo of Site Access



# 3.3 Site Characteristics

3.3.1 The environmental context of the proposed development site is outlined below.

#### Flood Risk & Drainage

3.3.2 The water features within and adjacent to the development site are identified on the map below:



Figure 3.7: Watercourse location

- 3.3.3 The details of the water features in and around the site are described below:
  - OS mapping shows an unnamed watercourse (locally called Ford Stream) conveys flows west-north-west through the middle of the site.
  - A second unnamed watercourse conveys flows north-west through land approximately 60m to the north-east of the site.
  - A tributary of Watercourse 2 conveys flows north-west along the north-east boundary.
  - A third unnamed watercourse conveys flows west, approximately 20m to the south of the south-west corner of the site.
  - A fourth unnamed watercourse conveys flows north-west, west of the southwest boundary of the site.
  - There are small ponds/hollows located throughout the site.
- 3.3.4 The Site is predominantly located in Flood Zone 1, indicating a low probability of flooding. Land surrounding Ford Stream varies between Flood Zone 2 and Flood Zone 3.



3.3.5 It is understood that the short stretches of the lowest lying surrounding highway network and land around Rockbeare have flooded in the past.

# Agricultural Land Classification

- 3.3.6 An Agricultural Land Classification site survey was carried out on 15th July 2021. The assessment has determined that 92% of the development site represented Grade 3b (a wet medium or heavy clay loam), with the remaining 8% found to be Grade 3a, located alongside the banks of Ford Stream.
- 3.3.7 The area of land which runs alongside the stream (identified as being grade 3a) is in the flood plain and will mainly be part of the drainage plan and ecological and landscape enhancement areas.

## Transport and Access

- 3.3.8 The northern and western boundaries of the main development areas are located immediately adjacent to the A30 trunk road boundary.
- 3.3.9 A number of local road options to travel to the site include:
  - To the west there is a 3.8km route from the site to the B3184 which passes through Westcott and past Exeter Airport.
  - There is an alternative route to the B3184 which bears south initially and then west. This route is also 3.8km in length, passes through Aylesbeare.
  - To the east there is a 2.3km route from the site to the B3180 which passes through Marsh Green village.
  - To the north there is a 2.2km route from the site to the B3174 which extends along Gribble and Rockbeare Lanes.
- 3.3.10 The local roads in the vicinity of the site generally comprise a rural single-track width (circa 3m wide) and are bound by a verge at both edges followed by a formal boundary such as a hedge, wall, or fence, with frequent agricultural accesses present along the roads. Passing points are generally located within the vicinity of the field access to adjacent land and are provided on a sporadic basis, allowing for agricultural vehicles passing oncoming cars.
- 3.3.11 The roads in the vicinity of the site frontages are subject to the national speed limit (60mph), with no streetlighting or centre-line road markings provided.
- 3.3.12 The development site is accessed via differing field gates dependant on location as follows:
  - The northern area is located immediately southeast of the A30. The land is currently accessed via the main farm gate located just east of the bridge over the A30.
  - The eastern area is located to the east off Quarter Mile Lane and features an existing field access off the northern edge of the drovers road.
  - The centre of the site is located to the west of Quarter Mile Lane and can be accessed via two existing agricultural access points located off the western edge of the carriageway.



- The southern area is located to the north and south of Withybed Lane. There are two agricultural accesses located to the north, and one agricultural access located to the south of the carriageway.
- 3.3.13 These routes and accesses are presented on plan DV5045PD-001.

# Public Rights of Way Network

3.3.14 The nearest Public Right of Way runs north south from Withybed Lane and is located to the west of the proposed development boundary beyond field D2.

## Heritage

- 3.3.15 There are no heritage assets within the site boundary. There are no World Heritage Sites, Registered Historic Battlefields, Scheduled Monuments or Conservation Areas within 2km of the site.
- 3.3.16 There are 44 heritage assets within a 2km buffer of the development sites, predominantly clustered in Marsh Green, Aylesbeare, and Rockbeare Manor. The assets' listings are:
  - One grade I listed asset, three grade II\* listed, and 39 grade II listed assets; and
  - One grade II listed park and garden.
- 3.3.17 There are seven designated heritage assets where the setting may include the proposed development site and which are assessed in the technical Heritage report:
  - Rockbeare Manor Park & Garden.
  - Lower Marsh Farmhouse.
  - Westcott Farmhouse.
  - Barn approximately 20m south of Westcott Farmhouse.
  - The Knoll.
  - Westcott House.
  - Rose Cottage.
  - The Old Post Office.
- 3.3.18 In addition to the designated heritage assets, there are nine non-designated heritage assets within the development site boundary:
  - The possible location of a searchlight battery.
  - Extraction pits/quarries.
  - Earthwork banks.
  - Field barns (extant or site of).
- 3.3.19 A geophysical survey was undertaken within the proposed development area. The geophysical survey was undertaken in accordance with an approved WSI and focused on those parts of



the site topographically suited to that technique and agreed with the DCC Historic Environment Team during a site walkover.

- 3.3.20 The survey concluded that the methodology had been successful in detecting and locating anomalies of potential archaeological and modern origin. Anomalies identified included:
  - Probable former field boundaries, and three groups interpreted as representing potential cultivation patterns.
  - Three groups of anomalies related to modern buried pipeline and pylons.
  - Two possible ditched enclosures potentially indicating prehistoric activity were identified within the site, at its north western and south eastern extents.
- 3.3.21 These results (described in further detail in chapter 7 and the Heritage Assessment) have been fed into the design process and, where required, further survey and mitigation will be provided.

## Ecology

3.3.22 A significant amount of ecological survey work has been undertaken to identify biodiversity in the area. The results are summarised below and described in full within the attached ecology reports:

#### Riparian Zone

- 3.3.23 A number of assessments of the Riparian Zones (water course) have been undertaken. These have concluded the following:
  - The 'Ford Stream' watercourse which is currently heavily poached along most of its length with a limited plant diversity.
    - o A small fish population is located in the western extent of the Ford Stream.
    - The stream forms an important area for badgers as a water source and for foraging.
    - $\circ$   $\;$  There are few riparian bird species identified along the stream.
    - There is little bat activity associated with the stream.

#### Extended Woodland

- 3.3.24 An assessment of woodland in the local area has identified the following:
  - An adjacent County Wildlife Site (CWS) Ancient Woodland.
  - Annex II bat species Barbastelle associated the CWS woodland.
  - The CWS woodland edge provides a swarming site for Noctule Bats.

#### Hedgerows

3.3.25 An assessment of the existing hedgerows has identified that they provide flight lines for at least 11 species of bats.



#### Grassland

3.3.26 The existing grassland provides foraging habitat for a maternity roost of serotine bats, with small areas of botanical interested identified. Overall, however it is of limited value and floral diversity.

#### Breeding Birds

- 3.3.27 A programme of breeding bird surveys has been undertaken. The survey has concluded that the extensive areas of hedgerows, woodland and dense scrub within the wider survey area are considered to support a diverse assemblage of nesting bird species. Skylark were recorded in a number of fields during the surveys.
- 3.3.28 One barn, located at field D2 has been identified as an occasional barn owl roost.

# Landscape Character

- 3.3.29 The site does not feature any landscape designations. The following text summarises the site characteristics, full details are available within the attached Landscape and Visual Impact Assessment.
- 3.3.30 The development site sits within the Lowland Plains and Farmland Character Area within the East Devon and Blackdown Hills Landscape Character Assessment 2019.
- 3.3.31 The development site is located within two Landscape Character Types (LCTs). The eastern extent of the development site is located within the lower rolling farmed and settled valley slopes LCT, with a small portion of the north-eastern and eastern section of the site sitting in the Lowland Plains LCT.
- 3.3.32 The lower rolling farmed and settled valley slopes LCT is described as a medium scale landscape, often with long views. The LCT is predominantly agricultural, with pastoral and arable land uses. Patches of woodland, corpses, and hedgerow trees give the landscape a well-treed character.
- 3.3.33 The LCT is characterised by:
  - Gently rolling landform, sloping up from valley floor.
  - Many hedgerow trees, copses, and streamside tree rows.
  - Predominantly pastoral farmland, often with a wooded appearance.
  - Semi-natural habitats include stream and ditches.
  - Numerous historic landscape features, including farmsteads, lanes, villages, and churches. Concentrations of Roman sites.
  - Settled, with various settlement sizes, building ages, patterns, and style.
  - Winding, often narrow sunken lanes, with tall earth banks.
  - A relatively enclosed and sheltered landscape.
  - Views tend to occur across valleys, rather from within them. Higher land in other LCTs forms the backdrop to views.



- Often strong colours within the landscape, influenced by underlying geology, season and choice of crops.
- 3.3.34 The Lowland Plains LCTs is described as featuring gently sloping/undulating land surrounding the valley floors. The LCT is rural; however, parts are influenced by new development at Cranbrook and Exeter Airport. There are surviving pockets of traditional orchards, and areas of pasture, paddock, and small woodlands. Fields are generally surrounded by wide hedgerows, often with mature hedgerow oaks. Surrounding higher land provides the visual backdrop and offers views over the Lowland Plains.
- 3.3.35 The lowland plains LCT is characterised by:
  - Level to gently sloping or rolling plain between valley floors.
  - Small discrete woodland blocks.
  - Mixed farmland, often in arable cultivation.
  - Semi-natural habitats, including roadside hedges and trees.
  - Historic villages, farms and lanes.
  - Settled, with a mixed pattern of villages, hamlets and isolated farms.
  - Variable highway network from, from sparse lanes to motorways and A-roads.
  - Surprising feeling of remoteness in some parts.
  - Long views over low hedges. Some views marred by pylons.

#### Ground Conditions

3.3.36 The geology of the proposed development site is mudstone, siltstone and sandstone and in part overlain by sand and gravel.

#### Utilities

- 3.3.37 The site is subject to a number of utilities as follows:
  - Overhead Power Cables and Pylons:
    - The site contains five large steel pylons with their oversailing cables which dominate the valley as they pass north south across the site.
    - Two other electricity circuits of cables and wooden poles pass across the valley – one across the south facing slope of the northern ridge and the other between the site and the Westcott hamlet
  - A High-Pressure gas main which runs along Withybed Lane inside the hedgerows, yet outside the perimeter security fence, within fields D4 and D6.
- 3.3.38 The location of these utilities can be found in Construction Phase Plans ref TPS FO 001 005, TPS FO 001 006 and TPS FO 001 007.



# 3.4 Previous Uses

3.4.1 A review of historical Ordnance Survey maps and information pertinent to the site and within a 250m radius is summarised below:

Map Dates	On Site	Surrounding Area
1888	Fields with hedge lined boundaries. Westcott Lane shown dissecting the site into northern and southern sections. Three ponds are shown within north part of the site with a further two on the southern site boundaries.	Middleton Pit 300m S. Rag Lane and Westcott farm 200m W. Rockbeare House and parks 250m NW. Old Marl pit 200m S of the eastern area and another old marl pit 100m N of the eastern area. Marsh Green village 200m E. Quarter Mile Lane dissects the western and eastern areas of the site.
1906	No significant changes.	A spring is shown 100m S of the eastern area.
1938	No significant changes	No significant changes.
1968 - 1971	Footpath from east to the west. Pylons and electricity cables shown dissecting the site from the north to the south with a number of pylons within the site.	Old Marl pit 200m S is no longer shown. Old Marl pit 100m N no longer shown.
1992	No significant changes.	No significant changes.
2010	No significant changes.	Middleton pit shown as a pond.
2010-2021	No significant changes.	No significant changes

Table 3.4: Site History

- 3.4.2 A review of the on-line planning history at EDDC website has resulted in the identification of the following planning applications:
  - Diversion of overhead power lines to the north.
  - Agricultural Buildings associated with Marsh Green Farm.
  - Agricultural and Residential Applications associated with Little Westcott Farm.
- 3.4.3 In addition to the above, the following applications have been identified immediately adjacent to the site's boundary.
  - Agricultural Uses associated with Ford Farm to the South East.
  - Residential Applications associated with Marsh Green Village to the East.
  - Residential Applications associated with Westcott House to the West.
  - Agricultural Dwellings and Buildings associated with Holmer Dairy to the South.

# 3.5 Surrounding Development

- 3.5.1 There are a number of solar power facilities which have been constructed or gained planning consent in the local area.
- 3.5.2 These include:
  - Strete solar facility located approximately 0.85km to the north of the proposed development



- Saundercroft solar facility located approximately 3.2km to the north west of the proposed development.
- Houndsbeare solar facility located east of the site and east of Houndbeare Lane to the west of Furzy and Scarlet Wood Copse; and,
- A recently consented solar facility located c.1km east of the site to the east of Furzy and Scarlet Wood Copse.
- 3.5.3 The cumulative impacts of the proposed development and these schemes have been considered within the technical assessments submitted alongside the planning application, concluding that there would be no materially significant cumulative landscape nor visual impacts



# 4.0 Proposed Development

## 4.1 Introduction

4.1.1 This chapter provides details of the proposed development and should be read referencing plans set out in table 1.2 of this Planning Statement.

# 4.2 Built Form

- 4.2.1 The proposed development has been designed to include c.60,000 solar modules (creating an anticipated export capacity of 30MWp). The modules will be ground mounted on frames which will be direct or screw piled to a minimum of 1.4m in depth.
- 4.2.2 Each module will be approximately 2.4m in length and approximately 1.1m wide and positioned due south.
- 4.2.3 The site will include two types of frames as follows:
  - Angled at 15 degrees and c.3.14m in height (from back of the panel).
  - Angled at 20 degrees and c.2.9m in height (from back of panel).
  - These heights may increase slightly for those small array areas in Flood Zone 2, should the lower front edges need to be raised.
- 4.2.4 The site design includes a total of c.139 inverter boxes. which would be attached to the array frames around the site.
- 4.2.5 Underground cables will connect the power from the transformers (6 are proposed) to raise the AC voltage to the customer substation.
- 4.2.6 Each transformer will measure 2.6m in height, 6m in length and 2.4m in width.
- 4.2.7 A DNO substation and switch room would be located within a secure compound located to the north of Withybed Lane in field D4. A similar track would be provided for access and maintenance.
- 4.2.8 The DNO substation will measure 3.1m in height, 5.5m in length and 4.9m in width.
- 4.2.9 A Spare Parts container is also proposed at field D4 and will measure 2.9m in height, 6m long and 3.6m wide. This is positioned adjacent to the DNO substation.
- 4.2.10 These buildings will be dark green in colour.
- 4.2.11 The access tracks which remain after the construction phase will be constructed of MOT Type 1 with up to 15% concrete are proposed within the site.
- 4.2.12 Underground cabling will be used to connect the transformers to the substation.
- 4.2.13 A weld mesh security fence with be provided for the secure compound at the DNO substation (and associated equipment).
- 4.2.14 A deer fence, up to 2m high would be provided around the perimeter of the solar array and wildlife habitat fields. A 200mm gap beneath the fence has been allowed for wildlife to circulate the area.



- 4.2.15 The site includes security access gates into the solar array areas and panel gates across site accesses.
- 4.2.16 Details of the fencing and gates are provided in plans LOA1001.214.Di and LOA1001 214D



# 4.3 Solar Arrays and Infrastructure Design

# Northern Area

# 4.3.1 The proposed design for the northern area is set out in table 4.1 below:

Field Deference	Solar Arrays and	Access	Ecology	Drainage	Landscape
Field Reference	Infrastructure				
	Solar arrays at height of	Security gate from Rockbeare	Grassland seeding	Soil treatment and	Field utilising existing
	3.14m.	Lane to the north of the field.	managed through	vegetation cover to	hedgerow (to grow to
	1 transformer cabin	3.5m wide transformer cabin	grazing.	encourage infiltration	3 to 4m) and trees for
	located in the south of	access and maintenance track	Hedgerow created and	and reduce runoff.	landscaping.
	the field.	runs north to south through the	bat boxes installed on	Surface water from Haul	
	Development buffer	centre of the field.	mature trees on west	roads shed onto lateral	
	away from majority of	Outside the perimeter fence, a	side of field.	filter drains for	
DC01	archaeological zones.	sufficiently wide passageway		infiltration.	
	No arrays underneath	has been designed to allow	The 1.8 hectares of no		
	overhead power cables.	landscape, ecology and	development due to the		
	Off set from mature	drainage maintenance access	buried archaeological		
	hedges, woodland, and	to the west of DC02, the wet	assets will be seeded and		
	pond.	grassland strip and DC03	maintained through		
	Fence line set back from		grazing.		
	field edge.				
	In the East of this field:	Existing field access from DC01	In the East within the	Swale at foot of slope	Additional hedgerow
	Solar arrays at height of		fence:	and shallow filter drains	planting to screen
	3.14m.		Grassland seeding	along solar array drip	views from A30 and
DC02	No ancillary		managed through	lines where the gradient	Westcott Lane.
	infrastructure.		grazing.	is steep.	
	Standoff underneath				
	overhead power cables.		In the West, outside the		
			fence:		


Field Peference	Solar Arrays and	Access	Ecology	Drainage	Landscape
	Infrastructure				
	Off set from mature		Bat box to be installed on		
	hedges, woodland, and		mature trees in		
	existing ponds.		hedgerow located to the		
	Fence line continued		south.		
	from DC01.				
			Additional tree planting		
			for screening at south		
			boundary.		
	No infrastructure	From DC02 west (outside the	Network of field margins	Natural	Additional tree and
		fence)	and corners managed as		hedge planting.
Grassland wet			rough grassland providing		
strip			habitats for reptiles,		
			small mammals and		
			invertebrates.		
	No infrastructure.	Access across the grassland wet	Wet Devon	Provision of scrapes	Proposed tree
		strip from DC02	meadow seeding.	adjacent to existing	screening to the north
DC03			Bat boxes in mature trees	watercourse.	of the field.
0003			to the east of site.		
			Area to be managed by		
			meadow cutting.		
	Solar arrays at height of	Existing access from DC02	Localised seeding to	Swale constructed north	Hedge to the west
	3.14m. Angled to reduce		enhance current	and west of solar arrays.	and south both
	/ negate any possible		grassland cut on a 3-year		maintained at 4m
	glare towards two homes		rotation.		height and grow wild
0004	on the east of Westcott				to screen views from
	hamlet				Westcott Lane.
	No ancillary				
	infrastructure				



Field Reference	Solar Arrays and	Access	Ecology	Drainage	Landscape
	Infrastructure				
	Off set from mature				
	hedges, woodland and				
	watercourse.				
	Solar arrays at height of	During construction and	Localised seeding to	Natural drainage to	Hedges to be
	2.9m.	decommissioning, use of the	enhance current	watercourse.	maintained to screen
	No ancillary	existing gate and access track	grassland cut on a 3-year		solar arrays from
	infrastructure.	off Westcott Lane.	rotation.		Westcott Lane.
	Off set from mature	During operation, access			
20	hedges, woodland, and	through the existing gateway to			
08	watercourse.	and from D9			
	Perimeter fence				
	continued from around				
	fields to the west and				
	north.				
	No infrastructure	From Quarter Mile Lane	Insert	Ford stream flows within	Western and northern
	No initiastructure	outside of the perimeter	msert	this narcel along the	hedges to be
		security fence along the		southern hedgerow	maintained at 4m
		northern hedge of D9 to the		southern neugerow.	Southern bedge
"Pistol"		existing gateway into this			managed from within
113001		narcel			
					No change to eastern
					houndary bodgo and
					maturo troo
	North of Ford Stroom:	Socurity gate off Quarter Mile	North of Ford Stroom	Off cat from the ovisting	Field carooned by
DO	Solar arrays at height of	Security gate of Quarter Mile	within the fence	watercourse to the	evicting moture
60	Solar arrays at neight of	Lane about 400m south of	within the rence:	watercourse to the	existing mature
	2.9m.	Marsh Green.	Localised seeding to	south. Scrape provided	nedgerow and trees –





Field Peference	Solar Arrays and	Access	Ecology	Drainage	Landscape
Field Reference	Infrastructure				
	No ancillary		enhance current	adjacent to existing	north and south
	Infrastructure		grassland cut on a 3-year	watercourse.	hedgerows and trees
	Off set from mature		rotation. Additional tree		allowed to grow
	hedges, woodland, and		planting adjacent to		'wild'. East hedgerow
	watercourse.		existing watercourse.		to be maintained at
	Perimeter fence allows				4m high from internal
	for electrical		Areas to the south of the		field level
	maintenance team to		stream will include a		
	access D8.		leaky dam and wetland		
			creation.		
	South of Ford Stream:				
	No infrastructure. A				
	directional drill will install				
	a buried high voltage				
	cable under the stream,				
	the south of this parcel				
	and under Westcott Lane.				
	Solar arrays at height of	Construction and	Localised seeding to	Natural drainage	Eastern boundary to
	3.14m.	decommissioning access is	enhance current		be planted with a new
	No ancillary	through an existing field gate	grassland cut on a 3-year		hedgerow and
	infrastructure	from Quarter Mile Lane and	rotation.		occasional trees to
		Marsh Green farmyard.			improve screening
D14	Off set from existing	Maintenance access only from			from Quarter Mile
	mature hedges,	D17 and D18.			Lane.
	woodland, and pond.				
	Field surrounded by				
	security fencing.				



Field Reference	Solar Arrays and	Access	Ecology	Drainage	Landscape
	Infrastructure				
	Solar arrays at height of	Internal transformer access and	Localised seeding to	Filter drains to be	Maintain existing
	3.14m.	maintenance track to be	enhance current	provided on steeper	hedgerows and
	No ancillary	constructed through the field	grassland cut on a 3-year	areas of field.	mature trees and
	infrastructure	from DC01 to D16	rotation.		planting at southern
	Standoffs underneath				perimeter of the field.
	lines of overhead power				
D15	cables which run north				
	south through the site.				
	Off set from mature				
	hedges, mature				
	woodland, and ponds to				
	west and east.				
	Solar arrays at height of	Internal transformer access and	Localised seeding to	Natural drainage.	Maintain existing
	3.14m.	maintenance track to be	enhance current		hedgerows and
		constructed through the	grassland cut on a 3-year	The field drain which	mature trees.
	Transformer cabin	existing gateway from D15 to	rotation. Field tree	currently exits through	
D16		the proposed transformer pad	protection.	the western hedgerow	Any existing trees in
DIO	Off set from single	in the east of this parcel.		will be intercepted and	the existing southern
	mature tree within the			directed towards the	hedgerow will be
	field.			south of the field	allowed to grow up
					for screening
					purposes
	Solar arrays at height of	Accessed through existing	Localised seeding to	Filter beds under array	Scrub planting to both
	2.9m.	gateway to and from D15.	enhance current	tables and swale below	increase root zone
D17	Standoff underneath	Pre-commencement of any	grassland cut on a 3-year	SE arrays to prevent	percolation of
	overhead power cables	construction work, the	rotation. Bird boxes to be	overland flow exiting	infiltrating rainwater
	along northwest	southeast gateway into D17	installed on mature trees.	onto Rockbeare Lane.	and to increase the





Field Peference	Solar Arrays and	Access	Ecology	Drainage	Landscape
	Infrastructure				
	hedgerow bordering	from Rockbeare Lane will be			screening of the solar
	DC01b.	blocked up and marked "No			arrays from
	Off set from mature	Construction Traffic" with a			Rockbeare Lane when
	hedges and trees.	swale added to manage surface			exiting Marsh Green
		water.			village.
					Maintain existing
		During operational phases this			hedgerows and
		access will be reopened.			mature trees, with the
					south-eastern
					hedgerow being
					allowed to grow up
					'wild'
	No infrastructure.	Security gate on Westcott Lane.	Leaky dams and swale	Leaky dams and scrape	Existing mature trees
		Construction, decommissioning	constructed in and	adjacent to the stream	to be preserved.
		and operational maintenance	around existing	as it meanders into the	Western hedge
		passageway around the	watercourse. Bird box	field in the southeast .	allowed to grow up
64		western and northern field	installed on mature tree.		wild and southern
01		perimeter hedgerows following			hedgerow to Westcott
		the route of the existing tractor			Lane to be maintained
		and trailer route.			at 4m height from
					internal field level.
	Solar arrays at height of	Access from G4 following	Localised seeding to	All infrastructure has	Existing mature trees
	3.14m.	existing farm tractor and trailer	enhance current	been offset from Ford	to be preserved and
	Perimeter fence line	passageway.	grassland cut on a 3-year	Stream.	existing northern and
G5	continued from field		rotation. Additional tree	Drainage improved	eastern hedgerows
	DC04 to the north and G6		planting for screening	through soil treatment	maintained at 3m or
	to the east.		purposes along east field	and ground cover.	4m height.
			boundary.		



	Solar Arrays and	Access	Ecology	Drainage	Landscape
Field Kelerence	Infrastructure				
	No other ancillary				
	infrastructure.				
	Standoff underneath				
	overhead power cables				
	that pass over the				
	eastern hedgerow.				
	Off set from mature				
	hedges, mature trees,				
	and existing watercourse.				
	Solar arrays at height of	Access through the existing	Localised seeding to	Land imperceptibly	Existing hedgerows
	3.14m. Fence passes	farm gate to and from G5.	enhance current	slopes down to the	and hedge trees to be
	along southern portion of		grassland cut on a 3-year	north.	maintained.
	the field		rotation. Managed		
	No other ancillary		through grazing.		
	infrastructure				
66	Standoff underneath				
00	overhead power cables				
	that cross the north-west				
	corner of the field.				
	Off set from mature				
	hedges, mature trees,				
	and existing watercourse				
	and scrape to the south.				

Table 4.1



# Southern Area

4.3.2 The proposed design for the southern area is set out in table 4.2 below:

Field Deference	Solar Arrays and	Access	Ecology	Drainage	Landscape
Field Reference	Infrastruture				
	Solar arrays at height of	Security gate access and	Localised seeding to	Surface water to be	Existing mature trees
	2.9m.	maintenance track off	enhance current grassland	drained into	to be preserved and
	1 transformer to the east	Withybed Lane.	cut on a 3-year rotation.	soakaways and filter	existing hedgerows
	of the field which has		Field tree enhancements.	drain.	maintained. Ground
	been offset from the		Butterfly bank provided in		ploughed across slope
	internal track to ensure		field centre between		between arrays to
	views from the		existing field trees. Bird		mitigate construction
	Withybed Lane access		boxes installed on mature		compaction.
	gate are restricted by		trees.		
D2	the intervening existing				
	field boundary hedge				
	and trees.				
	Standoff underneath				
	overhead power cables.				
	Off set from mature				
	hedges, woodland.				
	Set back from perimeter				
	fence and Withybed				
	Lane				
	Solar arrays at height of	Construction and	Localised seeding to	Existing pond to be	Woodland planting to
	2.9m.	decommissioning will include	enhance current grassland	retained. Filter drains	screen views from
	No ancillary	through the existing gated	cut on a 3-year rotation	provided between	Withybed Lane and
D3	infrastructure other than	access at the north-east corner	managed through grazing.	arrays on steepest	new row of trees to
	perimeter fence.	of the field from Withybed		slopes.	screen views from
	Standoff underneath	Lane.			dwellings to the south.
	overhead power cables				Existing mature trees



Field Deference	Solar Arrays and	Access	Ecology	Drainage	Landscape
Field Reference	Infrastruture				
	that cross over the east	This will be blocked up post-			and hedgerows to be
	half of the field.	energisation as maintenance			maintained.
	Off set from mature	access will be off Withybed			
	hedges, woodland, and	Lane into D2 and through the			
	pond.	existing passageway into the			
	Set back from perimeter	NW corner of D3			
	fence and Withybed				
	Lane				
	Solar arrays at height of	Security gate on Withybed	Localised seeding to	Land drains into the	Existing mature trees
	2.9m.	Lane with new track from the	enhance current grassland	existing hedgerow	and hedgerows to be
	Site also contains DNO	SW corner of the field, then	cut on a 3-year rotation	and trees on the	maintained.
D4	substation, customer	running along within the	and part managed by	north side of field.	
	substation, a	western and northern	meadow cutting.		
	transformer cabin and a	hedgerows to the substations			
	spare parts container.				
	Solar arrays at height of	All access will be through the	Localised seeding to	Swale constructed	Existing mature trees
	2.9m.	existing field gate to and from	enhance current grassland	between solar arrays	and hedgerows to be
	No ancillary	field D6 to the east.	cut on a 3-year rotation.	and Westcott Lane.	maintained.
	infrastructure other than				
	perimeter fence and				
	buried high voltage cable				
D5	from D7 transformer to				
	D4 substation				
	Off set from existing				
	mature hedges and				
	trees.				
	Perimeter fence line				
1	borders Westcott Lane				



Field Peference	Solar Arrays and	Access	Ecology	Drainage	Landscape
Field Reference	Infrastruture				
	and crosses the existing				
	field to the south of the				
	solar arrays.				
	Solar arrays at height of	The northern parcel is	Localised seeding to	Swale proposed along	Existing mature trees
	2.9m in both northern	accessed through the existing	enhance current grassland	the northern extent	and hedgerows to be
	(adjacent to Westcott	farm gateway to and from D7.	cut on a 3-year rotation.	of the field.	maintained.
	Lane) and southern	In the southern parcel, a			
	(adjacent to Withybed	temporary construction and			
	Lane) parcels	decommissioing track of			
	No ancillary	ground protection matting will			
	infrastructure other than	pass from the existing gate off			
	perimeter fence and	Withybed Lane inside the			
	(across the northern D6	southern boundary hedge			
	parcel) the buried high	adjacent to, and passing over,			
	voltage cable from D7	the high pressure gas pipe and			
D6	transformer to D4	through the existing farm gate			
	substation.	into D4.			
	In the northern parcel,				
	PV arrays are omitted				
	from the north-facing				
	valley slope and, in the				
	southern parcel, are				
	purposefully set back				
	from ridge to minimise /				
	nullify visibility from				
	Westcott Lane and				
	Quarter Mile Lane.				



Field Deference	Solar Arrays and	Access	Ecology	Drainage	Landscape
Field Kelerence	Infrastruture				
	In the southern parcel,				
	the perimeter fence line				
	both borders Withybed				
	Lane and runs parallel to				
	it as it crosses the field				
	to the north of the solar				
	arrays.				
	Solar arrays at height of	New security gate and access	Localised seeding to	Land drains to the	Northern and eastern
	2.9m.	track off Quarter Mile Lane.	enhance current grassland	north-west to	existing mature trees
	New access track off		cut on a 3-year rotation.	proposed swale	and hedgerows to
	Quarter Mile Lane			inside the hedge	both be maintained at
	serving the transformer			bordering Westcott	4m from internal field
	cabin.			Lane.	level and allowed to
	Off set from existing				grow up naturally
	mature hedges and trees				
	along Westcott Lane.				
7	Perimeter fence line				
	borders Westcott Lane				
	and crosses the existing				
	field to the south of the				
	solar arrays.				
	A buried high voltage				
	cable passes from the D7				
	transformer to D4				
	substation				

Table 4.2



# Eastern Area

4.3.3 The proposed design for the eastern area is set out in table 4.3 below:

Field Poferance	Solar Arrays and	Access	Ecology	Drainage	Landscape
Field Reference	Infrastuture				
	Solar arrays at height of	Existing field gate	Localised seeding to	Land drains downslope	Existing mature trees
	2.9m.	with new access	enhance current grassland	to the north-west.	and hedgerows to be
	Fence line connecting	track running	cut on a 3-year rotation.		maintained.
	perimeter hedges	within the	Hedgerow created to form		Proposed hedgerow
	southeast of the existing	southern hedge	north-west field boundary.		and tree planting
	oak tree northwest of the	boundary of field.	Bat boxes installed on		along north-west
D10	solar arrays.		mature trees.		boundary.
	Area of open space				
	retained to the		Open area to be seeded		
	northwest, adjacent to		with Devon Meadow		
	Quarter Mile Lane.		Planting. Existing field tree		
			to be enhanced.		
	Solar arrays at height of	Accessed through	Localised seeding to	Land drains downslope	West and South
	3.14m.	the existing farm	enhance current grassland	to the north-west. A	hedgerows to be
	Perimeter fence inside of	gateway in the SW	cut on a 3-year rotation.	pond in the eastern	maintained at 4m.
	and along northern	corner, to and from	Field trees enhancement.	hedgerow flows in an	Northern hedgerow
D11	nedgerow	the north corner of		open ditch and sinks	and hedge trees to
		D12		into the ground on the	grow up naturally to
				west side of the field;	nelp screen views
				this ditch will be	Marsh Green village
				blocked with leaky	residences.
				dams	<b>-</b> · · · ·
	Solar arrays at height of	Internal access	Localised seeding to	Land drains north-east	Existing mature trees
D12	3.14m.	track which enters	enhance current grassland	and north towards	and hedgerows to be
		the field in the	cut on a 3-year rotation.		maintained.



Field Peference	Solar Arrays and	Access	Ecology	Drainage	Landscape
Field Reference	Infrastuture				
	1 transformer cabin in	north western		sinks and drains in field	
	the west side of the field.	corner through the		D11 and into field D10.	
		existing field gate			
	Perimeter fence	to and from D10.			
	continues south of field				
	D11 and is set back from				
	the eastern field				
	boundary hedge.				
	Solar arrays at height of	Accessed through	Devon meadow seeding	Swale to be	Existing mature trees
	3.14m.	existing tractor and	managed through grazing.	constructed on west	and hedgerows to be
	Off set from mature	trailer farm track	Bird boxes installed on	side of the field	maintained.
	hedges, woodland, and	and gate into the	trees along the southern	between the solar	
D13	pond.	northern corner of	boundaries.	arrays and existing	
510	Fence is set back from	the field.		watercourse and Check	
	field edge and ponds on			Dams/leaky dams built	
	east side of the field.			in stream running	
				along southern end of	
				the field.	
	No infrastructure	Access from the	Selected scrub removal	Provision of leaky	Woodland planting
		farm track into the	around ponds.	dams along the stream.	along boundary of
		northern corner of	Bund		CWS.
5 acre eco-enhancement		D13, south inside	Wetland creation.		
fields x2		the hedge and	Managed through		
		outside the	meadow cutting.		
		perimeter fence			
		and through the			
		existing farm			



Power & Storage Ltd				(	enzygo
Field Reference	Solar Arrays and	Access	Ecology	Drainage	Landscape
	Infrastuture				
		vehicle ford			
		through the stream			

Table 4.3



# 4.4 Ancillary Development

# **Road Improvements to Westcott Lane**

- 4.4.1 Improvements, to bridleway standard, to the surfacing of the Quarter Mile Lane and Westcott Lane junction are offered as part of the development.
- 4.4.2 Further details of these improvements can be agreed with Devon County Council Highways and Public Rights of Way departments as part of a condition to the planning consent.

# **Grid Connection**

4.4.3 The DNO substation is located within field D4 with the grid connection route running adjacent to the internal track (also located in field D4) to the point of connection steel pylon which is located to the north north-west of field D4.

#### Fencing and Gates into Solar Area

- 4.4.4 A deer fence up to c.2m high would be provided around the perimeter of the solar and green infrastructure. A 200mm gap beneath the fence has been allowed for to allow wildlife to circulate around the valley.
- 4.4.5 Access into the solar and green infrastructure facility parcels of land will be via gates which are also c.2.0m in height and 4m wide.
- 4.4.6 A weld mesh security fence will be provided for the secure compound at the DNO substation (and associated equipment).
- 4.4.7 Details of the fencing and gates are provided in Plans LOA1001-214Di and LOA1001-214D.

# Field Boundary Treatment

- 4.4.8 The existing field boundaries which are currently made up of hedgerow and trees will be retained and enhanced.
- 4.4.9 The hedgerow will be managed at 3m or 4m as identified on the Landscape Strategy Plan (ref: 035 220 Landscape Plan).
- 4.4.10 Following the construction phase, gates into fields D3, D6 and D8 will be closed and a continuation of the hedgerow will be installed.

#### Lighting

4.4.11 No permanent lighting is proposed. PIR sensor lights will be attached to the substation and transformer and cabins in the event of an emergency maintenance visit being required in the hours of darkness.

#### ссти

- 4.4.12 2.4mm high poles mounted with CCTV security cameras (c.300m high) will be installed around the perimeter fence of the site at intervals varying between 50m and 100m, to be agreed with the Landscape Officer pre-commencement by way of a Planning Condition (drawing LOA215).
- 4.4.13 The CCTV cameras will be directed along the fences and into the site and will not point at residential properties or their gardens.



# 4.5 Landscape measures

4.5.1 The proposed development includes a significant quantity of landscape enhancement and planting as set out in the Landscape Plan ref 035220.

# 4.6 Arboriculture

- 4.6.1 The proposal does not require the removal of trees during the construction or operational phases.
- 4.6.2 The significant enhancement measures proposed will lead to a greater level of protection to the existing trees, many of which have been surveyed and classed as Veteran Trees, which will result in a highly beneficial impact on these important landscape and ecological features.

# 4.7 Ecology

- 4.7.1 The proposed development includes a significant quantity (c45ha) of ecological enhancements and improvements which are presented within the Ecological Appraisal and associated Ecological Mitigation and Management plans submitted alongside the Planning Application.
- 4.7.2 The key areas of improvement are set out in the text below:

# Woodland

4.7.3 A new tree and meadow will be created within the ecological mitigation area to the south of D13, within the two fields bordering the Withybed Copse County Wildlife Site (CWS). Management will aim to encourage natural succession of woodland plant species from the CWS into this field. This area is currently a modified grassland.

#### Establishment:

- 4.7.4 Trees will be planted on average at 3x3m spacings 5m from existing hedgerows and 10m from the CWS boundary. Trees will be planted in clusters and drifts to instil natural flow through the landscape. Any losses within the first three years will be replaced.
- 4.7.5 The majority of tree species selected will be pioneer species of open ground. The species list includes but is not restricted to, silver birch Betula pendula, alder Alnus glutinosa, hawthorn Crataegus monogyna, oak Quercus robur, and hazel Corylus avellana. Scrub, field, and ground layer will be left to succeed naturally from the surrounding hedgebanks and woodland.

#### Management:

- 4.7.6 A ride of 10m will be established between the newly planted woodland and Withybed Copse CWS. This will improve habitat structure and protect the veteran trees on the edge of CWS from competition pressure from the younger trees. The ride will be maintained through yearly cutting carried out in September. A scalloped bay will be cut every 10 m along the ride.
- 4.7.7 The remainder of the area will be left unmanaged to facilitate natural scrub encroachment and plant colonisation of the new woodland area.

Monitoring:

4.7.8 For the first five years a check on the establishment and health of planted trees will be undertaken annually.



4.7.9 Every five years from planting, a botanical assessment of the site will be undertaken to monitor the ground flora.

# Wetlands, Watercourses and Standing water.

- 4.7.10 Within the proposed development site, several aquatic habitats are present. The majority of these are currently species poor and heavily poached by livestock.
- 4.7.11 The proposed development seeks to increase the biodiversity resilience and connectivity of the water bodies. This in turn will increase the flood resilience of the Clyst catchment as well as boost local amphibian, invertebrate, fish, and aquatic plant biodiversity. Impacts to species currently relying on heavily poached waterbodies within the catchment will be mitigated for by the establishment of new scrapes in naturally low-lying areas along the watercourse.
- 4.7.12 Ford stream runs from east to west across the Ford Oaks site. It is current heavily poached with low botanical diversity along its length. The proposed development will increase the amount of water held within the stream during wet periods, as well as improving water quality and riparian habitat on site.

#### Establishment:

- 4.7.13 Leaky dams will be installed along the length of Ford Stream. Each dam will consist of 5 logs, 4 of which will be dug 50cm into either side of the stream bank in a double row of two. The 5th log will be placed on top of these four and extend either side of the stream bank. This log will be staked in place and secured with wire. All logs will be bound together with wire. The lowest log will be placed 10cm above the flow level during the annual low flow in early September, allowing low and moderate flows as well as fish populations to pass through the dams.
- 4.7.14 The area 1m either side of the watercourse will be sown with pond edge seed mix in Fields D9 and G4. Along D9 and G4 a 5m buffer strip of tussocky grass mix will be sown to the north of the stream. This will reduce pollution entering the stream from the north.
- 4.7.15 In D9 and D13 the watercourse will be ungrazed which will reduce livestock poaching of the watercourse. A stock fence will be placed to limit grazing pressure on the southern bank of the stream in G4.

#### Management:

4.7.16 Replacement of damaged dams.

Monitoring:

- 4.7.17 An annual check of the condition of the water course to check the structural validity of leaky dams will be undertaken.
- 4.7.18 A botanical assessment will also be undertaken every five years from project start.

#### Scrapes

4.7.19 Small scrapes will be dug in areas nearby the stream to hold excess flood water. An additional bund will be installed in the mitigation field south of D13, to create a scrape from the water draining down the hill. These scrapes will drain naturally through evaporation over the course of spring and early summer.



4.7.20 These scrapes will improve invertebrate biomass and diversity on site as well as provide breeding opportunities for amphibians.

#### Establishment:

- 4.7.21 An excavator will dig a 30-50cm deep depression in marked areas close to the stream. These areas will have gentle sloped sides, tapering from the centre. The edges of the scraped area will be scalloped. All material from the scrape digging will be removed from the immediate area and used elsewhere on site.
- 4.7.22 In the mitigation area a bund will be constructed in the north-west of the field using earth from other parts of site. The bund will not exceed 50cm in height and it will be 1m thick. The bund will be impervious to water and will block the two drains currently present within the field. A sluice will be installed to ensure water does not over-flow the bund.

#### Management:

4.7.23 All the scrapes will be located in areas with light livestock grazing, the combination of this grazing and the fluctuations in water level will keep the scrapes free of scrub establishing.

#### Monitoring:

4.7.24 Monitoring will be undertaken at the beginning of each Spring to ensure that the scrapes hold water. This will be part of the larger watercourse monitoring.

#### Ponds

4.7.25 Several small ponds are currently present on site, the majority of these are heavily shaded. The proposed development will undertake thinning of vegetation around the ponds to increase light levels and increase perennial diversity around the ponds via seed sowing.

#### Establishment

- 4.7.26 Crown lifting of mature trees to 3m, and selective removal of shrub and trees will be undertaken around each pond.
- 4.7.27 A 1m buffer of pond edge species mix will be sown around the edge of each pond.

#### Management

4.7.28 Marginal vegetation around the ponds will be cut on a three-year rotation with one third of the vegetation being cut annually.

#### Grassland

4.7.29 The majority of the site is grassland. All grassland types on site are currently heavily modified and species poor. A variety of seeding and management regimes will be undertaken across the site to create a variety of well-connected grassland types. The following grasslands will be established:

#### Devon Meadow

4.7.30 The mitigation fields DC03 and D9 will be sown with Habitat Aids Devon Meadow mix. This mix is sourced roughly 20km from the site ensuring the resulting plant community will be resilient to site conditions, provide maximum benefits to biodiversity, and enhance the local



landscape. The mix includes Devon specialities such as corky fruited water dropwort Oenanthe pimpinelloides.

#### Establishment

- 4.7.31 Seed sowing will be undertaken in September. Prior to sowing the areas will be cut and scarified. The seed mix will be sown at a density of 4g per meter squared over the entire area.
- 4.7.32 During the establishment period the grassland will be lightly grazed at no more than 1 livestock unit (LU) per Ha, in line with light grazing across the rest of the site. This establishment period will be for 18 months after sowing has taken place.

#### Management

4.7.33 The newly created meadows will be managed through annual cuts. An annual cut will be undertaken at the end of August or beginning of September depending on weather conditions, with all cut vegetation being removed after laying in situ for two weeks. From October to March the area will be lightly grazed at no more than 1 LU per Ha, in line with light grazing across the rest of the site.

#### Flood Plain Meadow

4.7.34 A 10m buffer Zone along the stream edge in DC03 will be sown with Habitat Aid Wet Wildflower Meadow Seed Mix. This habitat will provide a selection of benefits to invertebrates with a diverse assemblage of wildflower suited to the damp conditions.

#### Establishment

- 4.7.35 Sowing will be undertaken in September. Prior to sowing the areas outlined on the map will be cut and scarified. The seed mix will be sown at a density of 4g per meter squared over the entire area.
- 4.7.36 During the establishment period the grassland will be lightly grazed at no more than 1 LU per Ha, in line with light grazing across the rest of the site. This establishment period will be for 18 months after sowing.

#### Management

- 4.7.37 The newly created meadow will be managed through annual cuts. An annual cut will be undertaken at the end of August or beginning of September depending on weather conditions, with all cut vegetation being removed after laying in situ for two weeks.
- 4.7.38 From October to March the area will be lightly grazed at no more than 1 LU per Ha, in line with light grazing across the rest of the site.

#### Tussock Grassland

4.7.39 The margins of many fields as well as north-facing field corners will be sown and managed as tussocky grassland. This will create a variety of micro habitats providing increased opportunity for invertebrates, reptiles, and small mammals.

#### Establishment

4.7.40 Sowing with an appropriate seed mix will be undertaken in September. Prior to sowing the areas outlined on the map will be cut and scarified. 30% of these areas will be sown with a tussock seed mix. The focus of the sowing will be on the larger field corners with areas next



to hedgerows left unsown. The seed mix will be sown at a density of 4g per meter squared over the required area.

#### Management

- 4.7.41 These grassland areas will be cut on a three-year rotation with one third of the grasslands being cut in any one year to ensure that the site maintains consistent areas of this habitat over winter with cuts occurring in late summer.
- 4.7.42 All cut vegetation will be removed after laying in situ for two weeks.

#### <u>Solar array grasslands</u>

4.7.43 The areas of grassland beneath and around the solar arrays will be managed as species-rich pasture lightly grazed by sheep.

#### Establishment

- 4.7.44 The existing ley and areas of archaeological buffer in DC01 will be oversown with a general purpose meadow mix. Within the remaining fields, 50% will be oversown with Premium wildflower only mix and 20% of the field areas in the solar array sections will be sown with a light shade hedgerow floral mix.
- 4.7.45 Sowing will be undertaken in September. Prior to sowing the areas outlined on the map will be cut and scarified. Sowing will take place at a density of 4g per meter squared in clusters across the area.

#### Management

4.7.46 The solar array grassland areas will be lightly grazed by sheep during the entire year at a stocking density of no greater than 1 LU per Ha. Occasional grass cuts and management will be carried out as required.

#### Grassland Monitoring

4.7.47 All grassland types will be monitored by an NVC survey carried out every 5 years from the start of the project. Success of habitat establishment will be assessed based on the similarity of the grassland habitats to listed NVC communities.

#### 4.8 Agricultural Statement

- 4.8.1 At the current time the proposed development site is being used for livestock rearing (majority of the area) and growing crops on rotation with rearing livestock (minority of the area).
- 4.8.2 Grazing uses will be retained as part of the proposed development.
- 4.8.3 The proposed development will result in the loss of approximately three fields (6 hectares) which are currently used for rotating livestock rearing with growing arable crops.
- 4.8.4 These fields will now be used for grazing between the arrays and ecological enhancement measures.

# 4.9 Drainage

4.9.1 Betterment to existing drainage situation (associated with fluvial and overland flows) will be provided by the following:



- Soil treatment and vegetation cover, as well as the provision of the SuDS drainage features of swales and filter beds at relevant locations around the fields and under the array table drip lines.
- Provision of leaky dams, which will utilise the channel capacity to back-up flood water, slowing the flow by holding back and spreading water into the floodplain when the water level is high during flood conditions, but not affecting normal flow conditions.
- Provision of a shallow scrape adjacent to the upstream, mid, and downstream reaches of the onsite watercourse, which will increase floodplain capacity.
- Jetting of silted highway drainage gullies and culvert crossing to reduce the frequency of highway flooding.

# 4.10 Archaeology

- 4.10.1 As part of the initial baseline assessment work a geophysical survey was undertaken, in accordance with the scope of works as agreed with Devon County Council's Archaeologist.
- 4.10.2 The geophysical survey identified some anomalies of potential archaeological interest in both the most northerly and southerly part of the site. In order to mitigate against any potential impact on these, the design was amended to either remove whole fields from the proposed development (such as fields G2 and G3) or to provide a significant development buffer (circa 10m).
- 4.10.3 There are a small number of other anomalies, in fields D17, D12, D13 and D2 to D4, which are likely associated with agricultural activity, including some linear features that are aligned to former boundaries on historic mapping. Given the likely relative archaeological potential of these have not been buffered. Figure 4.1, 4.3 and 4.3 below illustrates how the proposed development has been designed around the archaeological anomalies (the anomalies are identified in purple).





#### Figure 4.3 (Below): Southern Site



4.10.4 As agreed with the County Council's Archaeologist, this planning application includes a programme of trenching work to confirm (ground truth) and record the details of the anomalies. This will ensure that the proposed development will not have a detrimental impact on these remains.

# 4.11 Traffic movements

- 4.11.1 Operational traffic is expected to be minimal and consist of maintenance only, at a frequency of one to two visits per month.
- 4.11.2 These visits will be made by van or 4x4 type vehicles which will enter the site at field accesses (associated internal tracks) at DC01, D10, D9, D7, D4, D2 and G4.
- 4.11.3 In comparison to the existing agricultural vehicles required to cultivate the land, the operational traffic associated with the solar farm would result in a net reduction in vehicle movements on the local highway network.

# 4.12 Staff

4.12.1 The only staff employed will be for maintenance and will include 2 equivalent full-time personnel.

#### 4.13 Operation & Monitoring

- 4.13.1 The site will operate 24 hours per day.
- 4.13.2 The inverters and transformers would be monitored remotely using broadband / 4G technology.
- 4.13.3 The wider site will be monitored through site visits (as discussed in 4.11 above).

#### 4.14 Community Infrastructure Fund

4.14.1 A community infrastructure fund could be set up to provide the local community with an opportunity to fund those projects that are preferred in their area.



# 4.15 Construction

4.15.1 The total construction period for the proposed development, including the preparation of the site, fencing, assembly and erection of the photovoltaic arrays, installation of the inverters / transformers and grid connection would be approximately 34 – 42 weeks (8 – 10 months). The precise period cannot be predicted due to the unknown timings and schedules of both the proposed escorted delivery convoys from the construction traffic Reception Compound adjacent to Exeter Airport and the extreme care and attention that will be required for marshalling construction traffic along the single carriageways of Quarter Mile Lane, Rockbeare Lane and Withybed Lane and through Marsh Green and Westcott settlements to ensure high levels of safety.

# **Construction Plan**

4.15.2 Construction plans TPS FO 001 005 to TPS FO 001 007 identify the status of the site during the construction phase. The key aspects of the construction phase are outlined below:

#### On-Site Access

- 4.15.3 Access into the site (and within the site) will be from a number of existing gateways as identified below. In some cases, temporary widening is required to allow vehicle access, on completion of the construction phase these accesses will be replanted and restored to their original form as identified on plan DV4045PD 001 and described below:
  - **DC01**: Temporary widening of existing gated access to create 6.8m opening:
  - **D10**: Temporary road plate widening into verge and widening of existing gated access to create 6.5m opening.
  - **D7:** Widening of existing gated access to create a 4.4m opening.
  - **D2:** Temporary road plate widening into verge and widening of existing gated access to create a 8.6m opening.
  - Access into gate D6 (Entry only): Widening of existing gated access to create 8.3m opening.
  - Exit from gate at D4 (Exit only): Temporary road plate widening into verge and widening of existing gated access to create a 5.5m opening; reinstated to 3.5m upon completion for the required Western Power Distribution access to their pylon and substation.
  - Field access between field DC01 to D15: Exiting opening to be increased to 6m.
  - Field access between field D15 to D16: Existing opening to be increased to 5m.
- 4.15.4 During construction a temporary gate will be installed at the field entrances.

#### Internal Tracks

- 4.15.5 The internal access tracks (which will be retained during operation) will have temporary turning areas to ensure vehicle movement through the site.
- 4.15.6 The location of these access tracks is presented in the construction plan (ref DV5045 10). These tracks will be retained throughout the operational phase of the development.



#### Equipment Distribution

- 4.15.7 Large deliveries will be transported to the site in HGVs, depositing equipment and materials and fuel within the designated set down and storage areas.
- 4.15.8 Some heavier materials will be lifted by hiab truck or a dedicated crane.
- 4.15.9 Modules and electrical equipment will be distributed into the construction fields using tractors and trailers, quad bikes with trailers, diggers and dumper trucks

Set Down Areas/Construction Compounds

- 4.15.10 A delivery and storage compound will be located in field D6.
- 4.15.11 Additional temporary distribution areas are likely in fields D7, D10, D14 and DC01.

#### Staff Welfare and Parking

- 4.15.12 The site provides temporary on-site parking for up to 20 vehicles and welfare facilities in area D3.
- 4.15.13 The welfare facilities will a temporary portacabin structure which is approximately 9m long, 3m wide and 3m high.

Cable routing

- 4.15.14 The solar arrays will be connected to the ancillary equipment by underground cabling.
- 4.15.15 Separate directional drills under Quarter Mile Lane, Westcott Lane and Withybed Lane will be required to ensure connection of the power cables through the site to the substation in D4.

High Pressure gas main

- 4.15.16 A stand off of 6m has been provided from the high-pressure gas main.
- 4.15.17 Consultation with Wales and West Utilities Limited has confirmed that this easement is satisfactory.
- 4.15.18 Wales and West Utilities Limited has confirmed that for any crossing points, hand dug trial holes should be carried out under the supervision of the utilities company to determine the exact depth of the main and confirm the level of protection measure required.
- 4.15.19 Taiyo Power and Storage Ltd confirm that this will be undertaken in accordance with requirements and best practice.

#### Foundations

- 4.15.20 The ancillary infrastructure will require the digging of shallow foundations.
- 4.15.21 Cut material from the digging of these foundations will be used for construction of the access tracks, levelling of the hardstanding areas and landscaping within the site.

#### Staff

4.15.22 The workforce over the construction period will fluctuate with an average workforce of up to 30 personnel on-site at any one time.



4.15.23 The majority of construction personnel will arrive around 08:00 and depart around 18:00.

# **Construction Hours**

- 4.15.24 Hours of operation construction hours of operation will be between 08:00 and 18:00 Monday to Friday and 08:00 and 16:00 on Saturday.
- 4.15.25 Within this period, construction deliveries can be controlled to occur outside peak hours of 08:00-09:00 and 17:00-18:00 to avoid conflict with peak periods on the local highway network on approach to the site.

# Construction Traffic Reception Compound

- 4.15.26 All deliveries to the site will be directed to the off-site Reception Compound located off the A30 / B3184 grade separate junction which is located at postcode EX5 2HN.
- 4.15.27 This area will act as a Reception and holding compound where vehicles are registered and held awaiting escorted convoys; the site will not store construction materials and will not regularly hold vehicles overnight (some arrivals will depend upon English Channel crossings and HGV Drivers' Hours).
- 4.15.28 The site will hold a temporary office and welfare building. These building are pre-fabricated and will be approximately 3m high, 3m wide and 9m long as identified on layout plan CRM3025.PL.D 010.
- 4.15.29 The existing access will be widened by 6.3m and will include temporary road plates in the verge.
- 4.15.30 This widening will result in the temporary removal of approximately 3m of hedgerow (no trees will be affected). This will be reinstated on completion of the construction phase. No other ecological or landscape enhancement/measures are proposed in this location.
- 4.15.31 Ground protection matting will be spread across the relevant parts of the field needed for the driveway, parking areas and office/welfare compound
- 4.15.32 Temporary traffic management including stop and go boards and banksmen will be used to control vehicles entering and exiting the site.
- 4.15.33 Following arrival of all required vehicles/materials a convoy will leave the site and proceed along one of the agreed construction traffic routes (discussed below).
- 4.15.34 Following the expiration of 12 months the site will be restored (reseeding if necessary) to its existing agricultural use.

# Traffic and Transportation

- 4.15.35 Traffic associated with the development will principally derive from the import of construction materials and equipment and construction personnel. This will consist of heavy goods vehicles (HGVs), vans and other small vehicles.
- 4.15.36 The PV modules and frames will be shipped in 40ft containers and will be carried to the site by articulated vehicles. The crushed stone material required for the onsite access tracks and hard standings is likely to be sourced locally and will typically be delivered in 10 tonne lorry loads. The portacabins will be transported to the site by appropriately sized commercial vehicles (maximum 12m in length). Finally, cranes or hiab trucks will be required to move



equipment around the site. It should be noted that the exact type of vehicles is subject to detailed design and confirmation from the final contractor and machinery supplier and will be set out in detail as part of the post consent detailed CTMP.

4.15.37 Table 4.1 below summarises the number and type of construction vehicles that are anticipated to be made to the site during the construction period:

Transported Item	Type of Construction Vehicle	Number of Construction Deliveries	
Mounting Frames	16.5m Articulated	104	
PV Modules	16.5m Articulated	70	
Portacabins & Fencing	12m Flatbed	50	
Cables	12m Flatbed	30	
Transformer / Invertor / Sub Station	12m Flatbed	10	
Gravel / Hardcore	10 tonnes Tipper	330	
Crane	12.3m Crane	2	
Total	596		

Table 4.1 Construction Traffic

- 4.15.38 The development is anticipated to be constructed over a 34-42 week period (8 10 months), generating approximately 596 construction vehicles, or 1,192 two-way (to and from the site) movements. This is expected to occur during this period to deliver construction materials and components.
- 4.15.39 The main bulk of construction deliveries will occur over short 8-week periods to minimise disruption on the local highway network. It is envisaged that all construction traffic would arrive at the construction reception site and would be escorted in a 4-vehicle convoy to the on-site storage compound at Parcel D6. This convoy would occur approximately 3 times a day and outside network peak times.
- 4.15.40 With regard to staff movements, based on the average workforce figures and on a 2 person per car occupancy rate, there could be on average, 15 staff movements, or 30 two-way movements per day. This may well be less as workers are often transported to and from solar construction sites by minibus.
- 4.15.41 In summary, during the busiest 8-week periods the site could generate up to 22 daily trips (44 two-way), of which 12 trips (24 two-way) would be construction vehicles (via HGVs) and 15 trips (two-way) would be staff (via cars, vans). This therefore represents a worst-case scenario in terms of construction traffic, given that the remaining construction period would only generate a limited number of deliveries.

# Traffic Routing

- 4.15.42 The A30 is a major A road which extends in an east / west direction from London to Land's End respectively, over a distance of 457km. More locally, the A30 provides a direct connection to Junction 29 of the M5 which is located 7km to the west of the site.
- 4.15.43 In the vicinity of the site, the A30 is a dualled two-lane carriageway which features grade separated junctions with the local highway network. The carriageway is subject to the national



speed limit and measures 8m in width in each direction. The A30 is a well-used road, with an annual average daily traffic flow in 2019 of 34,267 vehicles, of which 6% comprise HGVs (data taken from DfT traffic count website).

- 4.15.44 It is likely that both the construction and operational phases of the development will pass through the A30 / B3184 grade separated 4-arm roundabout, which is located 4.3km west of the site.
- 4.15.45 As part of the pre-application discussions, a number of routing options have been discussed with East Devon District Council and Devon County Highways.
- 4.15.46 This work has resulted in defining the following 4 routes to the site:

Route A - West via Westcott Road and B3184

- 4.15.47 To the west there is a 3.8km route from the site to the B3184 which passes through Westcott and past Exeter Airport. This route has been split into section as the highway conditions change along the route (see figure 4.4 below):
  - From the site to the small industrial estate on Westcott Road (2.4km distance), the route is subject to the national speed limit and is of a single-track width of 3.5m with passing points. Along this section is bridge over the A30 which is a single lane give-way (priority to vehicles travelling into Westcott) with areas either side to allow two vehicles to pass. There is currently no signage present indicating any weight limit restrictions associated with the bridge.
  - In the vicinity of the small industrial estate, the carriageway widens to 5.5m wide over a short section (allowing for two HGVs to pass), noting that this narrows back down to a single-track width to the west for 0.4km to the junction with the Hampton by Hilton Hotel.
  - From the Hampton by Hilton hotel junction to the B3184 (1km), the carriageway widens to between 4.8 and 5.5m and is subject to a 30mph speed limit.
  - The B3184 is a single lane two-way carriageway that extends 1km to the west and forms a 4-arm grade separated roundabout junction with the A30.



Figure 4.4 Route A - West to the B3184



Route B - South then West via Marwood Lane and B3184

- 4.15.48 There is an alternative route to the B3184 which bears south initially and then west. This route is also 3.8km in length, passes through Aylesbeare, with a description of the route provided below (see figure 4.5 below):
  - From the site to the junction of Withybed Lane / Quarter Mile Lane to the east (0.4km), the road is subject to the national speed limit and is of a single-track width of circa 3m. The junction itself is constrained by hedges abutting the carriageway, with on-site observations noting there were two substantial trees located within the hedges at the junction.
  - From the junction with Withybed Lane to the north and Marwood Lane to the south (0.6km), Quarter Mile Lane is a single-track width and is bound by hedges abutting the carriageway. Forward visibility along this section is limited due to its alignment and there are no passing points which would allow a car to pass a HGV.
  - From the junction with Quarter Mile Lane to the east and the B3184 to the west (2.4km), Marwood Lane is subject to a 30mph speed limit and comprises a rural single-track lane with frequent passing points provided along the route. On-site observations noted that whilst the most part of Marwood Lane had good forward visibility, however in the vicinity of the Shutebridge Farm this was severely constrained due to the S bend nature of the road.
  - The B3184 is a single two-way carriageway that extends 2km to the west and forms a 4-arm grade separated roundabout junction with the A30.



Figure 4.5 Route B - South then West to the B3184

Route C - East via Rockbeare Hill and B3180

- 4.15.49 To the east there is a 2.3km route from the site to the B3180 which passes through Marsh Green village. This route has once again been split into section as the conditions of the road change along its length (see Figure 4.6 below):
  - From the site to Marsh Green village (0.5km), the road is subject to the national speed limit and is of a single-track width of circa 3m.



- In the vicinity of Marsh Green (0.5km), the carriageway widens to 4.8m allowing two vehicles to pass and is subject to a 30mph speed limit, with on-site observations noting that there were sections of on-street parking which restricted the carriageway back down to single lane width.
- From Marsh Green village to the B3180 (1.3km), the carriageway narrows down measuring between 3.5m and 4.1m wide, with frequent passing points widening the carriageway to 5.5m wide. The road is subject to the national speed limit along this section.
- The B3180 is a single two-way carriageway that extends 1.2km to the north and forms a 4-arm grade separate junction with the A30.



Figure 4.6 Route East to the B3180

Route D - North via Gribble Lane and B3174

- 4.15.50 To the north there is a 2.2km route from the site to the B3174 which extends along Gribble Lane. This route has been split into section as the conditions of the road change along its length (See Figure 4.7 below):
  - For the first 0.4km north from the site along Gribble Lane, the carriageway comprises a single two-way carriageway that measures 5.5m wide and is bound by verges at both edges. Along this section Gribble Lane passes over the A30 and the road is subject to the national speed limit.
  - From the above point, Gribble Lane narrows down to a single-track lane with a width of approximately 3.5m wide with passing points provided to allow two vehicles to pass to the junction with the B3174 (1.8km).



• The B3184 is a single two-way carriageway that extends 3km to the east and forms a 4-arm grade separated roundabout junction with the A30.



Figure 4.7 Route D - North to the B3174

4.15.51 It is proposed that for the majority of deliveries would be in / towards the site via Route B and out / leaving the site via Route A. The remaining limited locations that will require limited transformer and crane/hiab truck access to be routed via Route C and Route D.

# Temporary Road Improvements

- 4.15.52 As identified on plan DV5045PD-10 a number of temporary road widenings are required to accommodate the construction traffic. These are outlined below:
  - Temporary off site widening at Rag Lane Junction: Temporary road plate widening into the verge.
  - Temporary off site widening at Withybed Lane Bend: Temporary road plate widening into the verge.
  - Temporary off site widening at Quarter Mile Lane/Withybed Lane Junction: Temporary Road Plate widening into the verge.
  - Temporary off site widening at Quarter Mile Lane (350m south of Withybed Lane): Temporary road plate widening into the verge.
- 4.15.53 These improvements will be secured via section 278 of the Highways Act.
- 4.15.54 The widenings do not result in the loss of landscape or ecological features (discussed later in this chapter) and do not encroach outside the highway boundary.

# Construction Traffic Management Plan (CTMP)

4.15.55 A full detailed CTMP will be provided following the granting of consent and the commencement of the main contractor construction process.



- 4.15.56 However, at this stage, an outline CTMP has been provided as part of the Transport Assessment. Key principles included within the outline CTMP are:
  - Work programme –anticipated start date and timescales for the project.
  - Routing of construction vehicles including how contractors will be made aware of the route to the reception compound and any restrictions prior to the journey.
  - On site operation details of where plant / materials will be stored on site and include where staff / contractors will park.
  - Number of vehicles accessing the site per day providing a breakdown of vehicle type / size weight.
  - Vehicle call-up procedure process for coordinating arrivals to and from the reception compound. Contractors should be given set times to arrive, with delivery instructions sent to all suppliers and contractors. Trained site staff must assist when delivery vehicles are accessing the site, or parking on the highway adjacent to the site in an emergency.
  - Banksmen must ensure the safe passage of pedestrians and vehicular traffic when vehicles are being loaded or unloaded.
  - Management team Site Manager or Site Foreman will coordinate and allocate time slots.
  - Hours of operation construction hours of operation will be between 08:00 and 18:00 Monday to Friday and 08:00 and 16:00 on Saturday. Within this period, construction deliveries can be controlled to occur outside peak hours of 08:00- 09:00 and 17:00-18:00 to avoid conflict with peak periods on the local highway network on approach to the site.
  - Site controls to include details of vehicle wheel wash facilities, measures to control dust and other emissions and noise control.
- 4.15.57 Temporary signage will be installed during the entire construction period to both direct sitebound traffic and make road users aware of turning vehicles at the site access.
- 4.15.58 The detailed CEMP will also include construction site emergency access arrangements and internal vehicle movement controls.

# Ecology and Arboriculture

- 4.15.59 As described above, the construction phase of the proposed development will result in the temporary widening of 8 access gates. This will result in the temporary loss of approximately 30m of hedgerow which will be reinstated on completion of the construction phase.
- 4.15.60 The existing field gates at D3, D5, D6 (south and north) and D8 will also be closed and planted.
- 4.15.61 The gated access of the Construction Reception Compound also requires widening, no other ecological/landscape features are affected by the temporary use of this area.
- 4.15.62 There will be no loss of trees during the construction phase, the tree protection plan (ref J000245) has been reflected in the design of both phases of the proposed development.



4.15.63 Protection fencing is also proposed around the barn at the entrance to field D2 to ensure protection of this habitat.

# **Construction Drainage**

- 4.15.64 The SuDS and drainage infrastructure for the development will be constructed as a priority for one of the first phases of construction and as such, the runoff from the construction phase will be suitably managed. Visual inspection measures will be implemented to ensure swales are generally free of sediment and turbidity and remove debris that may accumulate through the construction process.
- 4.15.65 At the Reception Compound, to reduce the impact on surface water rates following soil compaction, the movement of larger vehicles will be restricted and where this is not possible, a designated pathway will be demarked to reduce the area impacted.
- 4.15.66 Temporary rig-mats will be used to prevent disruption of surface soils and vegetative cover by construction vehicles and equipment, particularly during periods of inclement weather.

# СЕМР

4.15.67 A full Construction Environmental Management Plan covering both the reception compound and development site will be provided by condition on gaining planning consent.



# 4.16 Design Progression

- 4.16.1 The final layout and its associated construction strategy is the result of a progressive design process.
- 4.16.2 The final design has evolved from the following:
  - Landowner knowledge: Including the use of the least productive land.
  - On site features: including existing watercourses, hedgerow and trees.
  - On site utilities (and associated consultation): including overhead power cables, pylons and gas main.
  - Technical Assessment: which has identified site constraints and opportunities.
  - **Statutory Consultation:** Including discussion with Devon County Highways, Devon County Archaeology and East Devon District Council Planning Department.
  - **Consultation with the Parish Councils and members of the public**: Including fields of particular concerns, visual impact, road safety, residential amenity and potential for community gain.
- 4.16.3 A full description of the sites design progression is provided within the Design and Access Statement and Statement of Community Involvement submitted as part of the planning application.



# **5.0** Context of Renewable Energy in the UK

# 5.1 Introduction

- 5.1.1 The pertinent legislation and targets on the use of renewables in the UK are identified in this chapter. Most recently, the UK has committed for all electricity to come from clean energy sources by 2035 and the proposed development would help achieve this.
- 5.1.2 These documents form the key strands of central and local Government's policy and their policy commitment to renewable and low carbon energy and are considered material planning consideration when determining this application.

# 5.2 International Policy

# The Paris Agreement

- 5.2.1 In December 2015, the adoption of the 'Paris Agreement' was established through the 21<sup>st</sup> session of the Conference of Parties (COP21), which outlined the motives of the United Nations Framework Convention on Climate Change (UNFCCC) member states to refocus and meet the ambitions of climate change targets first introduced in the 'Kyoto Protocol' in 1992.
- 5.2.2 The Paris Agreement stresses the 'urgency of accelerating the implementation of the convention and its Kyoto Protocol' and within this, ensuring that the long-term temperature goals are met.
- 5.2.3 The Agreement sets out the ambition of holding the increase of global average temperature to 'well below 2°C' above pre-industrial levels and to pursue efforts to limit temperature increase to 1.5 °C. It was acknowledged that to achieve these ambitions, there is a requirement to ensure Parties reach global peaking of greenhouse gas emissions as soon as possible and do so by employing means that allow pathways toward 'low greenhouse gas emissions and climate resilient development'.
- 5.2.4 In October 2016, the threshold for entry into force of the Paris Agreement was achieved, with at least 55 countries, which account for at least 55% of the world's greenhouse gas emissions, ratifying the agreement. The Paris Agreement entered into force on 4th November 2016 and the UK ratified the Agreement on 18th November 2016.
- 5.2.5 In 2021 the UK hosted the COP26 Climate Change Conference at which more than 100 countries, including the UK, pledged their reduction of overall emissions of methane by 30% by 2030, compared with 2020 levels. China and the USA also released a joint statement that included the US's commitment to reach 100% renewable electricity by 2035 and China to "phase down" coal in the second half of this decade. The UK has followed the USA's commitment for the electricity to come from clean energy sources by 2035 and the proposed development would help achieve this.

# The Intergovernmental Panel on Climate Change

- 5.2.6 The Intergovernmental Panel on Climate Change (IPCC) is the United Nations body for assessing the science related to climate change. They provide regular assessments of the scientific basis of climate change, its impact and future risks, and options for adoption and mitigation.
- 5.2.7 The IPCC has published six comprehensive assessment reports reviewing the latest climate science, along with several special reports on specific topics.



5.2.8 The Sixth Assessment Report (AR6) is the latest key report, finalised in 2022.

# Climate Change 2022: Mitigation of Climate Change (April 2022)

- 5.2.9 The working group III report provides an updated global assessment of climate change mitigation progress and pledges, and examines the sources of global emissions. It explains developments in emissions reduction and mitigation efforts, assessing the impact of national climate pledges in relation to long term emissions goals.
- 5.2.10 The report states that:

"global modelled pathways that limit warming to 1.5°C (>50%) with no or limited overshoot, and those that limit warming to 2°C (>67%) involve rapid and deep and in most cases immediate GHG emission reductions in all sectors. Modelled mitigation strategies to achieve these reductions include transitioning from fossil fuels without CCS to very low- or zero-carbon energy sources, such as renewables or fossil fuels with CCS, demand side measures and improving efficiency, reducing non-CO2 emissions, and deploying carbon dioxide removal (CDR) methods to counterbalance residual GHG emissions.

Reducing GHG emissions across the full energy sector requires major transitions, including a substantial reduction in overall fossil fuel use, the deployment of low-emission energy sources, switching to alternative energy carriers, and energy efficiency and conservation. The continued installation of unabated fossil fuel55 infrastructure will 'lock-in' GHG emissions".



# 5.3 National Legislation and Guidance

# Climate Change and Sustainable Energy Act (2006)

5.3.1 The Climate Change and Sustainability Act enhances the contribution of the UK to combating climate change and securing a diverse and viable long-term energy supply by providing the need for a green certificate scheme for electricity from renewable sources and for reporting on the energy efficiency of residential accommodation.

# UK Renewable Energy Strategy (2009)

5.3.2 This document was published in July 2009 by DECC and the strategy sets out how the UK would radically increase the use of renewables including meeting the legally binding target to ensure 15% of energy was from renewable sources by 2020 and to capture the significant employment and investment opportunities the renewable sector could create.

# Renewable Energy Roadmap (2011)

- 5.3.3 The UK Renewable Energy Roadmap was first published by DECC in 2011 setting out the Government's commitment to renewables. An update to the Roadmap in 2012 identified solar as being a key technology as costs have fallen and deployment increased markedly. The update confirmed the Government views that solar PV has the potential to form a significant element of the overall renewable energy mix.
- 5.3.4 A further update was provided in November 2013 and reflected public support for solar, stating that in 2013, solar received the highest public approval of all renewable energy technologies at 85%. The 2013 update advises that, in June 2013 there was an installed capacity of 2.54GW and that *"there is also significant potential for further deployment."*

# Energy Security Strategy (2012)

- 5.3.5 Published by DECC in November 2012 the strategy considered the energy security of the UK and to ensure that consumers alongside physical security have price security and to ensure prices are not excessively volatile. The strategy identifies that electricity usage is expected to increase by 30% by 2030 driven mainly by increased demand by heating and electrification of transport and in particular electric cars.
- 5.3.6 The Energy Security Strategy also recognises the key aim of increasing the supply of renewable energy on the electricity supply which will reduce the need for the importing of fossil fuels. Through the increase of low carbon and renewable energy the UK energy supply will become more secure while simultaneously meeting climate change targets.

# The Energy Act (2013)

- 5.3.7 The Energy Act was given Royal Assent on the 18th December 2013 and makes a provision for the setting of a decarbonisation target range, duties in relation to it and for the reforming of the electricity market for the purposes of encouraging low carbon electricity generation. The legislation aimed to achieve the following objectives:
- 5.3.8 To update the UK's ageing energy infrastructure with a more diverse and low-carbon energy mix to help ensure future security of electricity supply, and to meet climate and renewables targets in a way that minimises costs to consumers.
- 5.3.9 The Act enabled the Secretary of State to set a 2030 decarbonisation target range for the electricity sector in secondary legislation.



5.3.10 The Act focuses on setting decarbonisation targets for the UK and reforming the electricity market to maintain a stable electricity supply as coal-fired power stations are retired. The Act was intended to "attract investment to bring about a once-in-a-generation transformation of our electricity market".

# House of Commons Briefing Paper 07434: Solar PV Farms: Funding, and Planning (2015)

5.3.11 The House of Commons released a briefing paper in December 2015 titled Solar PV Farms: Funding, Planning and Impacts which outlines the planning process and agricultural issues relating to Solar PV Farm developments. The report outlines the UK's plans for meeting the EU renewables targets and how solar can play an integral part in reaching these goals. It relays the NPPFs policy thrust that:

"LPA's should: not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and

approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should also expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas."

# Clean Growth Strategy (2017)

- 5.3.12 The Clean Growth Strategy sets out a comprehensive of policies and proposals that aim to accelerate the pace of "clean growth" i.e. deliver increased economic growth and decreased emissions. In the context of the UK's legal requirements under the Climate Change Act, the UK's approach to reducing emissions has two guiding objectives:
  - To meet our domestic commitments at the lowest possible net cost to UK taxpayers, consumers and businesses; and
  - To maximise the social and economic benefits for the UK from this transition.
- 5.3.13 To meet these objectives the UK will nurture low carbon technologies, processes and systems that are as cheap as possible. The government places great emphasis on securing increased investment across the energy systems whilst minimising as much as possible, the public costs.
- 5.3.14 This strategy includes the delivery of solar without subsidy and is emphasised at page 99 which states at bullet point 4 that the 'government want to see more people investing in solar without government support'.

# Climate Change Act 2008 (2050 Target Amendment) Order 2019

5.3.15 The overarching Act in relation to climate is the Climate Change Act 2008. The Act introduced a legally binding target to reduce the UK's GHG emissions to at least 80% below 1990 levels by 2050 and in June 2019, the Government passed an order to amend the 2050 carbon emissions target in the Climate Change Act 20 to zero net carbon (i.e. 100% below 1990 levels). This new target will essentially end the UK's contribution to climate change by 2050.


# Energy White Paper (2020)

- 5.3.16 The Energy White Paper<sup>1</sup> recognises that that between 1990 and 2018, emissions fell by 43% while GDP rose by 75%, with the UK decarbonising faster than any other G20 country since 2000. According to the White Paper (2020) *"in 2019, greenhouse gas emissions (MtCO2e) from electricity generation were down 13% on 2018 levels and 72% lower than 1990 levels, as we have switched from coal to gas and renewable power together with the continued contribution of nuclear".*
- 5.3.17 The White Paper (2020) goes on to state *"there is still much to do. Our energy system is dominated by the use of fossil fuels and will need to change dramatically by 2050 if we are to achieve net zero emissions. Decarbonising the energy system over the next thirty years means replacing.. fossil fuels with clean energy technologies."* The proposed development would help support the UK's transition to renewable energy and away from the dependence on fossil fuels.

# Digest of UK Energy Statistics (2020)

- 5.3.18 The digest is an essential data source (also referred to as DUKES) providing energy information on the UK's overall energy performance, production, and consumption. The digest is published annually with the latest edition being July 2020. The headline statistics from the report are:
  - In 2019, fossil fuels remained the dominant source of energy supply, but now account for 78.3% a record low level (down from 79.4% in 2018).
  - Supply from renewables increased to 12.3% of final consumption (from 11% in 2019).
  - For electricity generation renewables share of generation was at a record high of 37.1% in 2019 due to increased capacity from wind, solar and plant biomass capacity.
  - In 2019, overall net imports accounted for 35.2% of UK energy consumption (from 36% in 2018).

# The 6th Carbon Budget (2020)

- 5.3.19 The Sixth Carbon Budget, required under the Climate Change Act, provides ministers with advice on the volume of greenhouse gases the UK can emit during the period 2033-2037.
- 5.3.20 The Sixth Carbon Budget can be met through four key steps:
  - Take up of low-carbon solutions. People and businesses will choose to adopt low-carbon solutions, as high carbon options are progressively phased out. By the early 2030s all new cars and vans and all boiler replacements in homes and other buildings are low-carbon largely electric. By 2040 all new trucks are low carbon. UK industry shifts to using renewable electricity or hydrogen instead of fossil fuels, or captures its carbon emissions, storing them safely under the sea.
  - Expansion of low-carbon energy supplies. UK electricity production is zero carbon by 2035. Offshore wind becomes the backbone of the whole UK energy system, growing from the Prime Minister's promised 40GW in 2030 to 100GW or more by 2050. New uses for this clean electricity are found in transport, heating, and industry, pushing up electricity demand by a half over the next 15 years, and doubling or even trebling



demand by 2050. Low-carbon hydrogen scales-up to be almost as large, in 2050, as electricity production is today. Hydrogen is used as a shipping and transport fuel and in industry, and potentially in some buildings, as a replacement for natural gas for heating.

- Reducing demand for carbon-intensive activities. The UK wastes fewer resources and reduces its reliance on high-carbon goods. Buildings lose less energy through a national programme to improve insulation across the UK. Diets change, reducing our consumption of high-carbon meat and dairy products by 20% by 2030, with further reductions in later years. There are fewer car miles travelled and demand for flights grows more slowly. These changes bring striking positive benefits for health and wellbeing; and
- Land and greenhouse gas removals. There is a transformation in agriculture and the use of farmland while maintaining the same levels of food per head produced today. By 2035, 460,000 hectares of new mixed woodland are planted to remove CO2 and deliver wider environmental benefits. 260,000 hectares of farmland shifts to producing energy crops. Woodland rises from 13% of UK land today to 15% by 2035 and 18% by 2050. Peatlands are widely restored and managed sustainably.

# Environment Act 2021

- 5.3.21 The 2021 Environment Act sets out the legal framework for development of plans, policies and targets for improving the natural environment, environmental protection, waste and resource efficiency, air quality, environmental product standards, water, nature and biodiversity, conservation and chemical regulation.
- 5.3.22 In terms of biodiversity, DEFRA has begun consultations on the implementation of the Act's framework provisions. The Act also provides that all planning permission granted under the Town and Country Planning Act 1990 will be subject to a condition for biodiversity net gain that must be met before the development commences.
- 5.3.23 Ecological and biodiversity enhancements is at the core of the proposed development. The scheme presents extensive opportunities, circa 80 acres, for green infrastructure improvements and ecology networks across the site utilising the Building with Nature Accreditation Assessment.

# Net Zero Strategy: Build Back Greener (2021)

- 5.3.24 The UK Government recently published its latest strategy setting out the pathway to achieve a net zero economy by 2050, whilst also focusing on substantial near-future reductions in UK-wide GHG emissions, and ensuring that the legally binding 4<sup>th</sup>, 5<sup>th</sup> and 6<sup>th</sup> carbon budgets set under the Climate Change Act are met.
- 5.3.25 Chapter 3 Reducing Emissions across the Economy (3i Power: Delivering a decarbonised power system by 2035) states that the UK's key commitments are to take action so that by 2035, all our electricity will come from low carbon sources, subject to security of supply, bringing forward the government's commitment to a fully decarbonised power system by 15 years. In order to do this, the Net Zero Strategy states the need to *"accelerate deployment of low-cost renewable generation, such as wind and solar through the Contracts for Difference scheme by undertaking a review of the frequency of the CfD auctions"*.



# Update to the Energy Security Strategy 2022

- 5.3.26 Published on 7<sup>th</sup> April 2022, the Strategy states that the UK Government expects to see solar installations have **"a five-fold increase in deployment by 2035"** and that the Government "will consult on amending planning rules to strengthen policy in favour of development of ground-mounted solar on non-protected land, while ensuring communities continue to have a say and environmental protections remain in place".
- 5.3.27 The Strategy also announces an interim 2030 ambition of a four-fold raising of UK installed solar power from 14GW to 70GW.



# 5.4 National Planning Legislation and Guidance

- 5.4.1 International and European policies commit the UK to reducing its impact on climate change and increasing the supply of energy from renewable and low carbon sources. These commitments are reflected in existing national policy and need to be translated into local policy and action.
- 5.4.2 Planning has a significant role to play in meeting these commitments by understanding the local potential for renewable and low carbon technologies, identifying suitable locations for renewable and low-carbon energy production and supporting infrastructure, and for delivering renewable energy developments.

# National Planning Policy Framework (NPPF, 2021)

- 5.4.3 Paragraph 152 inter alia states "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".
- 5.4.4 Paragraph 158 states inter alia 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
  - Approve the application if its impacts are (or can be made) acceptable.
- 5.4.5 Paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by:

*"b)* Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland".

# Planning Practise Guidance for Renewable and Low Carbon Energy (2015)

- 5.4.6 The Department for Communities and Local Government outlined relevant planning considerations when assessing solar applications. The main considerations are listed below:
  - encouraging the effective use of land by focussing large scale solar farms on previously developed and non agricultural land, provided that it is not of high environmental value;
  - where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays. See also a speech by the Minister for Energy and Climate Change, the Rt Hon Gregory Barker MP, to the solar PV industry on 25 April 2013 and written ministerial statement on solar energy: protecting the local and global environment made on 25 March 2015.



- that solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use;
- the proposal's visual impact, the effect on landscape of glint and glare (see guidance on landscape assessment) and on neighbouring uses and aircraft safety;
- the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;
- the need for, and impact of, security measures such as lights and fencing;
- great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset;
- the potential to mitigate landscape and visual impacts through, for example, screening with native hedges;
- the energy generating potential, which can vary for a number of reasons including, latitude and aspect.
- The approach to assessing cumulative landscape and visual impact of large scale solar farms is likely to be the same as assessing the impact of wind turbines. However, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero.

# **Overarching National Policy Statement for Energy (EN-1)**

- 5.4.7 EN-1 was published in July 2011 and sets out national policy for energy infrastructure in the UK. The primary purpose of the policy is to be applied to decisions for Nationally Significant Infrastructure Projects. It is confirmed, however that this document can be a material consideration in the determination of planning applications.
- 5.4.8 Paragraph 3.4.1 sets out the UK commitments to sourcing 15% of energy from renewable sources by 2020. To hit this target, and to largely decarbonise the power sector by 2030, EN-1 states that: *"It is necessary to bring forward new renewable electricity generating projects as soon as possible. The need for new renewable energy electricity generation projects is therefore urgent."*
- 5.4.9 The National Policy Statement depicts how the energy sector can help deliver the Government's climate change objectives by clearly emphasising the need for new low carbon energy infrastructure to contribute to climate change mitigation.

# National Policy Statement for Renewable Energy Infrastructure

5.4.10 EN-3, also published in July 2011, sets out the national policy for renewable energy projects. EN-3 should be read in conjunction with EN-1.



5.4.11 Similar to EN-1, EN-3 lays out the importance of renewable energy in achieving the Government's targets for renewable energy generation, stating that a *"significant increase in generation from large-scale renewable energy infrastructure is necessary to meet the 15% renewable energy target"*.

# Draft National Policy Statement for Energy (EN-1)

5.4.12 The Government has recently consulted on updates to the NPS for Energy. EN-1 will be updated to reflect the net zero 2050 target (to replace the previous 80% target) and introduce an interim target of 78% reduction by 2035. The draft EN-1 is subject to consultation and is not yet formally adopted, and strictly only applies to nationally significant energy infrastructure projects, however, the proposed development will help achieve the above targets.



# 5.5 Local Plan Policies

- 5.5.1 The Council formally adopted the East Devon Local Plan 2013-2031 on 28th January 2016 and the policies contained within it are those where the policies contained within it are those against which applications are being determined and carry full weight.
- 5.5.2 The site falls within the Parish of Rockbeare which has a 'made' Neighbourhood Plan (NP) area where the policies within the NP carry full weight alongside the East Devon Local Plan.
- 5.5.3 The policies of relevance are outlined below.

#### East Devon Local Plan (2016)

- 5.5.4 The development plan for East Devon is made up entirely of the East Devon Local Plan, adopted in January 2016. It sets out the basis for the determination of planning applications in the district, alongside the National Planning Policy Framework (2021).
- 5.5.5 The site has no formal designation other than being in the Aerodrome Safeguarding Zone and is therefore considered open countryside (refer to Figure 6). The proposal map (figure 5.1 below) identifies the adjacent County Wildlife Sites.



#### Figure 5.1: Extract from the adopted Proposal Map

5.5.6 Development outside of built-up area boundaries falls to be considered under the provisions of Strategy 7 – Development in the Countryside of the EDLP which states the following:

"The Countryside is defined as all of those parts of the plan area that are outside the Built-up Area Boundaries and outside of site-specific allocations shown on the Proposals Map. Development in the countryside will only be permitted where it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development and where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located, including:

#### Landform and patterns of settlement

Important natural and manmade features which contribute to the local landscape character, including topography, traditional field boundaries, areas of importance for nature conservation and rural buildings.

The adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions".



5.5.7 The pertinent policies to a proposed Solar and Green Infrastructure facility are:

Strategy 39 – Renewable and Low Carbon Energy Projects

5.5.8 Renewable or low carbon energy projects will be supported in principle, subject to following best practice guidance and the impacts on features of environmental and heritage sensitivity, including any cumulative landscape and visual impacts. Proposals will need to consider the options in relation to location, scale, and design and mitigate any unavoidable harm. When schemes are proposed in the open countryside, there will be a requirement to remove all equipment and restore the land to its former condition after the lifespan of the development.

#### Strategy 46 – Landscape Conservation and Enhancement

- 5.5.9 Development will need to be undertaken in a manner that is sympathetic to and helps conserve and enhance the quality and local distinctiveness of the natural and historic landscape character. Development will only be permitted where:
  - Conserves and enhances the landscape character of the area;
  - Does not undermine the landscape quality; and
  - Is appropriate to the economic, social and well-being of the area.

#### Strategy 47 – Nature Conservation and Geology

5.5.10 Development must conserve the biodiversity and geodiversity of the land and minimise fragmentation of habitats. They must maximise opportunities for restoration, enhancement, and connection of habitats, and incorporate beneficial biodiversity conservation features.

#### Policy D2 – Landscape Requirements

- 5.5.11 Landscape schemes should meet all of the following criteria:
  - Existing landscape features should be recorded in detailed site surveys;
  - Existing features of landscape or nature conservation value should be incorporated into landscaping proposals. Where removal is unavoidable, provision for replacement should be made elsewhere;
  - Measures to ensure safe and convenient public access for all should be incorporated;
  - Measures to ensure routine maintenance and long-term management should be incorporated;
  - Provision for the planting of trees, hedgerows, including those of amenity value;
  - The layout of design of roads, parking, footpaths, and boundary treatment should make a positive contribution to the street scene and integration of the development into its surrounding and setting.

#### Policy EN8 – Significance of Heritage Assets and Their Setting

5.5.12 When considering development proposals, the significance of any heritage assets and their setting, should first be established by the applicant through a proportionate but systematic assessment sufficient to understand the potential impact of the proposal on the significance of the asset.



Policy EN9 – Development Affecting a Designated Heritage Asset

5.5.13 Where a development proposal would lead to less than substantial harm to the significant of a heritage asset, the harm will be weighed against the public benefit of the proposal.

Policy EN13 – Development on High Quality Agricultural

5.5.14 The best and most versatile agricultural land (Grades 1, 2, and 3a) will be protected from development not associated with agriculture. Permission for development affecting such land will only be granted if there is an overriding need for development.

Policy TC12 – Aerodrome Safeguarded Areas and Public Safety Zones

- 5.5.15 The outer boundary of the aerodrome safeguarded areas and the Public Safety Zones for Exeter International Airport are shown on the Proposals Map. Within these areas planning permission will not be granted for development that would prejudice the safe operation of protected aerodromes or give rise to public safety concerns.
- 5.5.16 Planning permission will not be granted for developments in the vicinity of an airport (or that could impact on safe operation of aeroplanes) that would compromise air safety by creating physical obstructions that could interfere with flight paths or navigational aids.

TC4 – Footpaths, Bridleways and Cycleways

5.5.17 Development which would result in the loss or reduce the convenience or attractiveness of an existing proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided.



# 5.6 Neighbourhood/Parish Plans

5.6.1 The proposed development will also be assessed against the Aylesbeare Parish Plan and Rockbeare Parish Plan.

#### Rockbeare Parish Neighbourhood Plan (2013-2031) (adopted 2018)

- 5.6.2 Rockbeare Parish Council submitted the Rockbeare Development Plan to East Devon District Council in 2018. The Neighbourhood Plan was 'made' by East Devon District Council, thus is a statutory development plan which has significant weight when assessing this proposed development.
- 5.6.3 Rockbeare Parish Council's vision is *"Responsible, distinctive and sustainable habitation in the countryside".*
- 5.6.4 The policies relevant to the proposed development are the following:

#### Policy No. Rock01 Local Woodlands, Trees and Hedgerows

5.6.5 Development proposals that will cause the loss of or damage to trees, woodland or hedgerows (including hedgerows of importance) that contribute positively to the character and amenity of the area must provide for appropriate replacement planting, together with a method statement for the ongoing care and maintenance of that planting.

#### Policy No. Rock 02 Devon Banks

5.6.6 Where change to existing traditional Devon banks is unavoidable, proposals for development which affect traditional Devon hedges will only be supported where it is demonstrated that options have been assessed and, as a result, the least damaging option is proposed (to the hedgerow / bank, setting in the landscape, biodiversity and habitats). Wherever suitable, boundaries for new development should include the use of native species of trees and hedges and be constructed using traditional techniques.

#### Policy No. Rock03 Public Rights of Way and Bridleways

5.6.7 The improvement and enhancement of public rights of way and bridleways will be supported as long as their value as wildlife corridors is not harmed.

#### Policy No. Rock 04 Flood Defence

5.6.8 Proposals to improve river management and construct new defences to reduce flooding will generally be supported. In improving flood defences, opportunities should be taken to enhance biodiversity.

#### Policy No. Rock05 Important Views and Vistas

- 5.6.9 There are important panoramas, vistas and views within Rockbeare, or views to and from the Parish that contribute to its rural character and the quality of the countryside which should not be harmed by development. Development should not compromise the following panoramas, vistas and views:
  - A. View south east from Silver Lane
  - B. View of Southwood and Home Covert
  - C. View along Parsons Lane towards Rockbeare



- D. View towards Rockbeare from Lions Farm
- E. View northwards from Long Lane

#### Policy No. Rock09 Flood Avoidance

5.6.10 Where practicable and appropriate, development proposals should incorporate a Sustainable Drainage System (SUDS) to minimise flood risk.

# Ayelsbeare Neighbourhood Plan

5.6.11 Ayelsbeare Parish Council requested that part of their parish be designated a neighbourhood area. The area was designated on 3 September 2014 and this allowed Aylesbeare Parish Council to commence the production of a Neighbourhood Plan with the support of, and input from, the residents of the Parish. A draft Neighbourhood Plan was submitted in January 2017 however, it is yet to be 'made'.

#### 5.7 Other

#### The Solar Energy UK's 10 Commitment for Solar Farms

- 5.7.1 Solar farm developers, builders or tenants who are members of Solar Energy UK, of which Low Carbon Alliance Ltd are, use the following best practice guidance:
  - We will focus on non-agricultural land or land which is of lower agricultural quality.
  - We will be sensitive to nationally and locally protected landscapes and nature conservation areas, and we welcome opportunities to enhance the ecological value of the land.
  - We will minimise visual impact where possible and maintain appropriate screening throughout the lifetime of the project managed through a Land Management and/or Ecology plan.
  - We will engage with the community in advance of submitting a planning application.
  - We will encourage land diversification by proposing continued agricultural use or incorporating biodiversity measures within our projects.
  - We will do as much buying and employing locally as possible.
  - We will act considerately during construction and demonstrate 'solar stewardship' of the land for the lifetime of the project.
  - We will seek the support of the local community and listen to their views and suggestions.
  - We commit to using the solar farm as an educational opportunity, where appropriate.
  - At the end of the project life, we will return the land to its former use.



# Building Research Establishment (Bre) Planning Guidance for Solar PV Farms

5.7.2 The Building Research Establishment (Bre) has produced a planning guidance document 'Planning guidance for the development of large-scale ground mounted solar PV systems' mainly targeting developers considering Solar PV Farm developments in the UK. This document set out planning considerations a developer should consider in respect of Environmental Impact Screenings, how to mitigate against visual impacts, mandatory planning fees, assessing the suitability of the chosen site and the most environmentally sustainable methods of construction.

# East Devon Commitments

5.7.3 The District Council declared a climate and ecological emergency and have made a pledge to become a carbon-neutral council by 2040. The Council have developed a Climate Change Strategy 2020-2025, which sets out the Council's programme to reduce carbon emissions and mitigate against the impacts of climate change.

# **Devon Green Infrastructure Strategy**

- 5.7.4 The Green Infrastructure Strategy sets out the following guiding principles for development in Devon:
  - Planning for green infrastructure at the outset;
  - Ensuring Resilience in water and flood management;
  - Protecting and enhancing biodiversity;
  - Conserving, enhancing and strengthening links with Devon's landscape;
  - Conserving and enhancing the historic environment;
  - Enabling access, fitness and contact with nature;
  - Securing Local Food Supply; and,
  - Responding to Climate Change.



# 6.0 Assessment Against Planning Policy

# 6.1 Introduction

- 6.1.1 Consistent with the requirements of S70(2) of the Town and Country Planning Act, as amended, and S38(6) of the Planning and Compensation Act 2004, this proposal is designed to fully comply adopted development plan.
- 6.1.2 The key policy documents against which this proposal will be judged are summarised in chapter 5 of this Planning Statement. Matters which are considered to hold significant weight in the determination of this proposal are explored in the following section.

# 6.2 Principle of the Development

- 6.2.1 In the 21st Century climate change was recognised as a phenomenon of international and global significance. The scientific evidence is overwhelming and identifies that **climate change**, as a result of rising greenhouse gas emissions, threatens the stability of the world's climate. The continuing production of greenhouses and carbon dioxide is contributing to the increasing rate of climate change.
- 6.2.2 To rapidly address the impacts of climate change, in May 2019, a national climate change emergency was declared by the UK Parliament. MPs called on the Government to make changes that included setting a new target of reaching **net zero** emissions before 2050. On June 27th, 2019, the UK Parliament approved the net zero target in law, thereby changing the original target of 80% reduction of greenhouse gas emissions (compared to 1990) in the UK to 2050 to 100%.
- 6.2.3 Ahead of November 2021's COP26 climate summit in Glasgow, the UK Prime Minister, Boris Johnson, announced the intention for all **electricity in the UK to be produced from clean sources by 2035**. The target means a rapid switch from the remaining coal and gas-fired power stations to wind, solar and nuclear energy within 15 years. This statement was enshrined within the Governments Build Back Greener Strategy.
- 6.2.4 The Clean Growth Strategy provides guidance on increasing economic growth whilst reducing emissions. Page 99 stating that 'the Government wants to see more **people investing in solar** without Government Support'.
- 6.2.5 In addition to the need to decarbonise the electricity industry, the need for **energy security** has never been more important, recent world events and soring energy costs highlight the need for the UK to become more energy autonomous. The April 2022 Energy Security Strategy announced a n 2030 ambition of a four-fold raising of UK installed solar power from 14GW to 70GW.
- 6.2.6 These Global and National drives have also been recognised more locally. **East Devon District Council have declared a climate and ecological emergency** and have made a pledge to become a carbon-neutral council by 2040. The East Devon Climate Change Strategy 2020-2025 sets out the Council's programme to address Climate Change and focuses on the reduction of carbon emissions within the district.
- 6.2.7 The proposed development responds to the climate change emergency through the provision of 30MWp of renewable and low carbon energy equivalent to the power consumed by 18,500 homes across the EX5 2 postcode area in 2020. The development will decarbonise the UKs

Taiyo Power & Storage Ltd



energy supply whilst providing East Devon District Council with the opportunity to achieve their local targets for Climate Change.



# 6.3 National Planning Policy

- 6.3.1 The importance of reducing the impact of Climate Change is also highlighted within planning policy. The NPPF (in paragraph 158) stating that applicants are not required to demonstrate overall need for renewable or low carbon energy (if impacts can be made acceptable).
- 6.3.2 Paragraph 170 of the NPPF requires that planning decisions should contribute to and enhance the natural and local environment. The proposed development seeks to enhance the local eco systems and biodiversity, aiming to become the first solar park in the UK to achieve the Building with Nature accreditation.
- 6.3.3 This accreditation seeks to ensure that nature is at the heart of development in a way that's good for people and wildlife.
- 6.3.4 Paragraph 170 of the NPPF also seeks to protect the best and most versatile agricultural land. The proposed development is not on land classified as best and most versatile, this is discussed further in chapter 7 of this Planning Statement.
- 6.3.5 With regard to land use, planning practice guidance sets out a number of considerations for the development of solar. These are addressed below:

"encouraging the effective use of land by focussing large scale solar farms on previously developed and non agricultural land, provided that it is not of high environmental value"

6.3.6 Due to the size of the proposed development, it has not been possible to located on previously developed land.

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

- 6.3.7 An agricultural land use assessment has been carried out as part of the site selection process and is included within the planning submission. This document found that 92% of the development site is composed of Grade 3b soils (a wet medium or heavy Clay Loam), with the remaining 8% found to be Grade 3a, located alongside the stream running across the site.
- 6.3.8 The area of land which runs alongside the stream (identified as being grade 3a) is in the flood plain and will mainly be part of the drainage plan and ecological and landscape enhancement areas.
- 6.3.9 As set out within Annex 2 of the NPPF, land designated as grades 1,2, and 3a is considered the best and most versatile. As such, development of the site will not lead to a significant loss of the best and most versatile agricultural land.
- 6.3.10 The proposed development is supported by a detailed Landscape and Environmental Management Plan (LEMP). This LEMP seeks to provide for both continued agricultural use and improvements in biodiversity as follows:
  - Areas which will be managed for grazing (these fields are already being used for grazing and this agricultural use will not be replaced by the proposed development).
  - Areas which will be seeded as meadow.
  - Areas for new woodland planting.



• Tree and hedgerow protection and enhancement.

"that Solar PV Farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use".

- 6.3.11 The proposed development is for a temporary period of 40 years, following this time the area will be restored as agricultural land.
- 6.3.12 The increased biodiversity and landscaping provided as part of the development will continue to provide biodiversity enhancement in the area following cessation of the use.

"the effect on landscape of glint and glare and on neighbouring uses and aircraft safety".

- 6.3.13 Landscape impacts have been considered though a detailed site selection process which has involved the selection of a local valley which reduces long distance views into the development site.
- 6.3.14 Landscape impact has further been considered within the design process, removing fields (or part thereof) to reduce the overall impact of the proposed development (further detail of this process is provided within the DAS).
- 6.3.15 The landscape and visual impact assessment was scoped with the officers at East Devon Council and the results are discussed further in Chapter 7 of this Planning Statement.
- 6.3.16 A Glint and Glare assessment has also been undertaken as part of the design process. The assessment has assessed the impacts on surrounding residents, road users (particularly but not limited to the A30) and also the impact on the nearby Exeter Airport.
- 6.3.17 The results of the initial Glint and Glare assessment resulted in the removal of solar arrays from field DC02b, DC02c and DC03. An updated Glint and Glare assessment has been submitted in support of this planning application and the results are discussed further in Chapter 7 of this Planning Statement, notably changing the orientation of modules in DC04 to reduce the likelihood of any glare being received at any residences on the east of Westcott hamlet.
- 6.3.18 Due to the proximity of Exeter Airport, Aircraft Safety has been carefully considered as follows:
  - Assessment of Glint and Glare as described above;
  - The proposed development does not introduce any large areas of open water that have the potential to attract flocking birds.

"the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun".

6.3.19 The solar arrays proposed are static and will not track the sun.

"the need for, and impact of, security measures such as lighting and fencing".

- 6.3.20 The only lighting proposed at the site is PIR sensor security lighting which will be used at the substation and transformers.
- 6.3.21 It is not anticipated that these will be used and will only be triggered if emergency repairs are required during the hours of darkness.



- 6.3.22 CCTV poles will be directed along the fence and into the solar site and will not impact on the privacy of local residences or gardens.
- 6.3.23 Details of security fencing and gates, as well as the proposed/replaced field gates are discussed in Chapter 4 of this Planning Statement.
- 6.3.24 The impacts of these have been assessed within the landscape and visual impact assessment which is discussed further in Chapter 7 of this Planning Statement.

"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".

- 6.3.25 The heritage assessment summarised in Chapter 7 of this Planning Statement has confirmed that the proposed development will not have a detrimental impact on any heritage assets or their setting.
- 6.3.26 A scheme of archaeological trenching has been undertaken. The geophysical survey identified some anomalies of potential archaeological interest in both the most northerly and southerly part of the site.
- 6.3.27 In order to mitigate against any potential impact on these, the solar park design was amended to remove the field of interest from the development or provide a buffer zone around the features of interest.
- 6.3.28 A programme of archaeological trenching (ground truthing) is proposed prior to commencement of the development to confirm the findings of the geo physical survey.
- 6.3.29 A scheme of works has been submitted alongside this planning application and the archaeological trenching is underway. This approach has been agreed with the County Archaeologist.
- 6.3.30 Should assets of interest be found, the appropriate steps will be taken in consultation with the County Archaeologist.

"the potential to mitigate landscape and visual impacts through, for example, screening with native hedges".

- 6.3.31 The proposed development will remove approximately 30m of hedgerow during the construction phase. This will allow construction vehicles access into the site. Upon completion of the construction phase this will be reinstated.
- 6.3.32 No mature trees will be removed as part of the proposed development, a tree protection plan (ref J000245) is provided in support of the Planning Application. This enhancement and protection will offer a significant benefit on the existing situation.
- 6.3.33 A substantial amount of tree planting is also proposed to enhance the local wildlife sites present to the proposed developments east and west.
- 6.3.34 In order the screen the development, the existing hedgerows will be enhanced and protected (being maintained at 3 to 4m as it is currently), with selected existing trees in hedgerows being allowed to grow up with some new planting being proposed as shown in the Landscape Plan Ref 035 220. This proposed planting has been carefully designed to add to the ecological enhancements and wildlife habitats as well as screen views into and across the site whilst retaining the overall character of the area.



6.3.35 Further details of the proposed planting and associated screening are provided in the Landscape and Visual Impact Assessment submitted in support of this Planning Application.

"energy generating potential, which can vary for several reasons including, latitude and aspect"

6.3.36 The proposed development includes array tables at two heights, these have been selected on the basis of landscape and energy generating potential.

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

- 6.3.37 Due to the nature of the proposed development, there are limited pathways to link this solar and green infrastructure facility with other solar developments in the area.
- 6.3.38 A large proportion of the proposed development is set in a natural hollow which has little/no visual impact on the wider area.
- 6.3.39 There are a number of other solar facilities (built or with planning permission in the area). The cumulative impact of these has been addressed within the Landscape and Visual Impact assessment submitted in support of this planning application.
- 6.3.40 The assessment concludes that the addition of this proposed solar facility in addition to the local solar facilities identified in Chapter 3 of this Planning Statement will not introduce any materially significant cumulative effects on the landscape and visual receptors in the area.



# 6.4 Local Planning Policy

6.4.1 Policy 39 of the East Devon Local Plan supports renewable or low carbon energy projects subject to the following considerations:

"Impacts on features of environmental and heritage sensitivity".

6.4.2 The proposed developments impact on the environment and heritage sensitivity has been assessed within the supporting technical assessments and are summarised in Chapter 7 of this Planning Statement. They confirm that the proposed development does not have a detrimental impact on the local environment or heritage features.

"Cumulative landscape and visual impacts".

- 6.4.3 A full landscape and visual impact assessment has been undertaken and submitted alongside this Planning Application and has concluded that the proposed development is not considered to have any cumulative effects on the landscape and visual receptors in the area.
- 6.4.4 The results of the assessment are provided within Chapter 7 of this Planning Statement.

"Proposals will need to consider the options in relation to location, scale, and design and mitigate any unavoidable harm".

6.4.5 The proposed development has undergone a detailed design progression which is documented in the Design and Access Statement submitted alongside the Planning Application.

#### Location

- 6.4.6 A robust regional site search process was undertaken to identify potential sites within proximity of the local Grid network with capacity.
- 6.4.7 This process, undertaken with Western Power Distribution, identified the potential for a connection to 132 circuit to the north of Withybed Lane.
- 6.4.8 This connection restricted the site search to the local area.
- 6.4.9 Part of this site search process was to identify areas of lower grade agricultural land within the identified area of opportunity. The online land mapping tool provided by Natural England, indicates the Agricultural Land Classification (ALC) in the site to be Grade 3 (good to moderate). Across the wider landscape, there are isolated areas of lower quality land which could be identified as a sequentially preferable location for development, however, part of this area is developed and some distance from the point of connection.
- 6.4.10 Following the identification of lower grade agricultural land, the area was assessed in on the following basis:
  - *Potential for Landscape and Visual Effects*: The proposed development site is located within a natural valley which reduces its visual impact.
  - *Surroundings:* The proposed development requires a significant area of land and as such wider industrialising factors were considered during the site search process. The development site and its immediate surroundings are subject to a number of industrialising factors including Exeter Airport, the A30 and overhead power lines which cross the site.



6.4.11 The proposed development site is therefore considered to be sequentially preferable for a ground mounted solar power generating facility in the vicinity of the available grid connection.

<u>Scale</u>

6.4.12 The scale of the solar infrastructure has been derived by the grid connection capacity and the availability of land for ecological and landscape conservation and enhancements, which led to the inclusion of Devon County Council fields to provide an appropriate balance

<u>Design</u>

- 6.4.13 An extensive design programme has been undertaken to ensure that the proposed development has reduced its impacts on the site and surrounds as follows:
  - Infrastructure and Utilities: There are a significant number of utilities running across the proposed development site. These include overhead lines, pylons, electricity cables and a high-pressure gas main. The final layout has ensured that these features are protected and where necessary a standoff provided.
  - Access: The design has sought to ensure that access into the site is achieved, both during operation and construction, whilst public safety is achieved.
  - **Boundary Treatment**: Boundary treatments such has hedgerow, fencing and gates have been carefully designed and considered to ensure that the visual impact of the proposals are minimised.
  - **Drainage and Flooding**: A sequential approach to flooding has been followed, developing outside the floodplain where possible and ensuring a suitable passive drainage system is in place.
  - Archaeology: Following the identification of archaeological remains, the design has either removed fields or included a buffer around the features of greatest significance. A programme of ground truthing is proposed prior to development being commenced. Should remains of significance (as defined by the County Archaeologist) be identified a scheme of mitigation will be agreed.
  - **Agricultur**e: Where possible, agricultural uses have been retained at the proposed development site.
  - **Ecology**: Existing flora and fauna have been enhanced and protected and new biodiversity assets created.
  - **Visual Impact**: Where the impact of the design has been considered to give rise to significant visual impacts, these fields have been removed from the layout. Screening has been proposed to mitigate the impact of the development on its surroundings.
  - **Consultation**: A programme of consultation has been undertaken resulting in the removal of some fields from the design and amendments to access arrangements to enhance road safety.

#### Mitigation and Enhancement

6.4.14 The proposed development has proposed a number of mitigation and enhancement measures as integral to the design. These include:



- **EEMP**: The proposed ecological mitigation and enhancement measures provided by the proposed development aim to provide a biodiversity uplift of 121% whilst achieving the Building with Nature Accreditation.
- **Complementing adjacent County Wildlife Site**: The proposed development includes the creation of woodland areas, strengthening and protecting linkages with neighbouring County Wildlife Site.
- Landscaping Strategy: The proposed landscaping strategy aims to protect and enhance existing trees and hedgerow whilst planting further trees and hedgerows to mitigate views into the site and connect the landscape and wildlife corridors.
- **Trees**: Protection and enhancement of existing mature trees in the area.
- **Drainage**: Providing a betterment to the existing drainage network, reducing the potential for offsite flooding.

"When schemes are proposed in the open countryside, there will be a requirement to remove all equipment and restore the land to its former condition after the lifespan of the development".

- 6.4.15 The solar (and ancillary infrastructure) fields will be restored to agricultural use following completion of the development.
- 6.4.16 The ecological enhancements, meadow and tree planting will be retained to provide the area within ongoing biodiversity and wildlife.
- 6.4.17 Table 6.1 below summarises the remaining environmental protection policies which have been considered as part of this planning application. A full assessment of the proposals against these requirements is provided within the technical reports submitted alongside the planning application.

Policy No	Policy Requirement	Assessment
Strategy 46	Landscape Conservation and Enhancement	The proposed development has sought to conserve local views and vistas. The impact of the proposed development is assessed in the LVIA submitted alongside the planning application and summarised in Chapter 7 of this PS. It can therefore be concluded that the proposed development does not undermine the landscape quality.
Strategy 47	Nature Conservation and Geology	The proposed development conserves and maximises the opportunities for biodiversity and connectivity with the wider area. The proposal offers a biodiversity improvement on the current situation.



Policy D2	Landscape Requirements	A full and detailed landscape strategy has been provided. Public access into the open space between Quarter Mile Lane and D10 can be provided if this is of interest to the local community.	
Policy EN8	Significance of Heritage Assets and Their Setting	An assessment of on site and local heritage assets has been provided within the heritage assessment submitted as part of the planning application.	
Policy EN13	Development on High Quality Agricultural Land	The majority of the proposed development site is grade 3b agricultural land. Some areas of grade 3a land are located alongside the Ford Stream. The majority of these areas are used for ecological and landscape enhancements.	
Policy TC12	Aerodrome Safeguarded Areas and Public Safety Zones	The proposed development will not have a detrimental impact on Exeter airport. A glint and glare assessment has confirmed that there will not be any glare from the proposed development which will have an impact on the airport, control towers or runway. The ecological assessment has confirmed that enhancement measures will not encourage flocking birds which could have a detrimental impact on aircraft.	
Policy TC4	Footpaths, Bridleways and Cycleways	There is one Public Right of Way which passes through neighbouring fields, west and southwest of field D2. The landscape and visual impact assessment has concluded that the development would be seen from a very short stretch of the PRoW (less than 200m) as summarised in chapter 7 of this report.	

#### Table 6.1: Environmental Protection Policies of East Devon Local Plan

#### 6.5 The Neighbourhood Plan

- 6.5.1 The Rockbeare Neighbourhood Plan does not identify suitable locations for renewable development. However, the plan includes an action which aims to establish a working group for sustainable energy options.
- 6.5.2 The Plan has some key actions which the proposed development contributes towards:
  - **Road improvements**: The proposed improvements to the T junction of Quarter Mile Lane and Westcott Lane.
  - **Flooding**: Providing a betterment of the existing situation.



- **Network of public footpaths**: The provision of a community infrastructure fund to allow residents to apply for the connectivity they would like in the area.
- **Biodiveristy audit and improvement:** Increase biodiversity and ecological enhancement in the area.
- **The provision of open space** which could be used by members of the public through the community infrastructure fund.

# 6.6 Summary

- 6.6.1 Renewable energy schemes of this scale are now a fundamental part of the Government's strategy and the policy provisions expressed in the NPPF and NPPG highlight the general acceptability in principle of locating large scale solar development within the countryside.
- 6.6.2 This chapter has demonstrated that the principle of the proposed development accords with the Devon County Green Infrastructure Strategy and East Devon District Council adopted development plan subject to detailed matters which are explored further in chapter 7 of this Planning Statement.



# **7.0 Environmental Considerations**

# 7.1 Introduction

7.1.1 This chapter considers the potential for environmental and amenity impacts from the proposed development; in many aspects, striving to adhere to the Guiding Principles of the Devon County Green Infrastructure Strategy.

# 7.2 Agricultural Land Classification (ALC)

- 7.2.1 As identified in chapter 2 of this Planning Statement, an Agricultural Land Classification site survey was carried out on 15th July 2021. It found that 92% of the development site is composed of Grade 3b soils (a wet medium or heavy Clay Loam), with the remaining 8% found to be Grade 3a, located alongside the stream running across the site.
- 7.2.2 The area of land which runs alongside the stream (identified as being grade 3a) is in the flood plain and will mainly be part of the drainage plan and ecological and landscape enhancement areas.
- 7.2.3 As set out within Annex 2 of the NPPF, land designated as grades 1,2, and 3a is considered the best and most versatile. As such, development of the site will not lead to a significant loss of the best and most versatile agricultural land.

# 7.3 Flood Risk

7.3.1 A site-specific Flood Risk Assessment (FRA) has been undertaken for the proposed scheme, the summary and conclusions are presented below:

#### Flood Risk & Drainage

- 7.3.2 The risk of flooding has been assessed as follows:
  - The risk of fluvial flooding is assessed as negligible for most of the Site but low to high for mapped areas of flooding associated with onsite/adjacent watercourses.
  - The risk of groundwater flooding is assessed as medium below ground where superficial deposits are present, and low above ground.
  - The risk of surface water flooding is assessed as negligible for most of the Site, but low to medium risk associated with overland flows and ponding.
  - The risk of flooding from all other sources is assessed as negligible.

#### Mitigation Measures

- 7.3.3 Flood risk has been mitigated to a negligible or low and acceptable level through the following approach:
  - Locate more vulnerable electrical equipment (i.e. transformers and substations) to areas outside the mapped extent of fluvial flooding.
  - Solar panels (modules) will be waterproof / flood sealed electrical components and connections; and sealed and waterproof inverters and transformers to provide protection during a flood event.



- Provision of easements free from development along either side of the onsite watercourse. These easements will provide access for inspection and maintenance purposes, including vehicle access to the channels and associated structures.
- Minimisation of the number of watercourse crossings along the route of onsite watercourse. Culvert crossings will be sized to convey peak flows, also allowing for climate change event.
- Maintenance activities will keep the onsite watercourse clear from debris and overgrown vegetation to maintain the conveyance of the channels.

#### Betterment

- 7.3.4 Betterment to identified flooding issues (fluvial and overland flows) will be provided by the following measures which will be incorporated into the Construction and Environmental Management Plan:
  - Soil treatment and vegetation cover, as well as the provision of SuDS drainage features.
  - Provision of leaky dams, which will utilise the channel capacity to back-up flood water, slowing the flow by holding back and spreading water onto the floodplain when the water level is high during flood conditions, but not affecting normal flow conditions.
  - Provision of scrapes adjacent to the upstream, mid, and downstream reaches of the onsite watercourse, which will increase floodplain capacity.

#### Flood Guidance

7.3.5 Essential infrastructure in Flood Zones 2 and 3 (medium to high risk) triggers the requirement for the Sequential and Exception Test. This can be overcome considering the importance of renewable energy, the fact that the Site will not be permanently manned (accessed for inspection/maintenance), as well as the implementation of flood mitigation measures detailed above, which will ensuring the development remains operational for the lifetime of the development.

#### Site Drainage

- 7.3.6 It is proposed that runoff will shed off the proposed solar panels/infrastructure footprints, and flow overland with some infiltration at source.
- 7.3.7 The stilted nature of the solar panels means increases in impermeable area would be negligible.
- 7.3.8 Concentrated runoff will be mitigated by:
  - Utilizing a well-maintained vegetation cover, which can be managed by grazing.
  - Orientate solar panels across contours (where possible) to ensure runoff from each panel will run directly into the drier rain shadow area beneath the panel downslope.
  - Installing shallow swales as a buffer along the foot of the steeper hillslopes.
  - Diverting water from existing field drains into parcels of land not needed for the solar arrays for ecological enhancement areas;



- Utilising filter strips to manage runoff from infrastructure footprints/solar array.
- Access tracks will shed surface water onto lateral filter drains where it is allowed to infiltrate. A permeable geotextile lining would capture any oil and sediment.
- 7.3.9 There are no identified long-term polluting activities associated with the associated with the operational phase. Preparation of a Construction Environment Management Plan (CEMP) will set out mitigation measures as well as detailed methodologies and monitoring requirements during the construction phase to prevent adverse effects on the water environment (i.e. watercourses and groundwater).

# Conclusion

7.3.10 This FRA demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of national policy and guidance. Furthermore, through appropriate mitigation measures there would be a negligible impact on pollution to protected groundwaters. The development should not therefore be precluded on the grounds of flood risk, as well as surface water and foul drainage during the operation and construction phases.

# 7.4 Heritage

- 7.4.1 Historic Environment baseline surveys for the proposed Ford Oaks Solar and Green Infrastructure facility site (and reception area) have been undertaken, and comprised a desk-based assessment, 'GPA3' setting assessment, site visits, walkover survey and geophysical survey, together with extensive consultation with Devon County Council's Senior Historic Environment Officer. As a result of these surveys baseline data was gathered, providing evidence of:
  - Prehistoric, Roman, Medieval and predominantly post medieval activity within a 1km area from the proposed development site;
  - A historic landscape character that preserves late medieval or early medieval field enclosure, with modification through boundary loss. The rural and agrarian character of the proposed development site is evident through its known archaeology and historic landscape character;
  - A high potential for late prehistoric settlement activity on the higher ridges to the north and south of the site, evidenced by anomalies of probable archaeological origin found through geophysical survey.
  - A built heritage character of farms, agricultural buildings, farm workers cottages in nucleated hamlets and occasional higher status properties, mostly of post medieval date.
- 7.4.2 There are six known heritage assets with archaeological interest within the footprint of the proposed development. These comprise;
  - the possible location of a searchlight battery (asset ID 15);
  - extractions pits, quarries (asset IDs 20 and 34);
  - earthwork banks (asset IDs 33 and 35); and
  - geophysical anomalies (asset IDs 44 and 45).



- 7.4.3 Assets 15, 20, 34, 33 and 35 are of local value and assets 44 and 45 are potentially of regional significance and moderate value. This relates to the assets' evidential and historic interest. It is predicted that the construction phase of the proposed development could result in effects on these assets, before mitigation, that is minor adverse for assets 15, 20, 34, 33 and 35 and minor to moderate adverse for assets 44 and 45. However, further archaeological field evaluation is planned to identify an appropriate programme of mitigation. After the implementation of suitable and proportionate mitigation measures the residual effect of the proposed development on heritage assets with archaeological interest is predicted to be **negligible to none**.
- 7.4.4 There are seven grade II listed buildings where the contribution made by setting to their heritage values could be affected by the operation of the proposed development. These assets comprise:
  - Asset ID LB11, Grade II listed Westcott Farmhouse
  - Asset ID LB12, Grade II listed Barn approximately 20m south of Westcott Farmhouse
  - Asset ID LB25, Grade II listed The Knoll
  - Asset ID LB34, Grade II listed Westcott House
  - Asset ID LB39, Grade II listed Rose Cottage
  - Asset ID LB41, Grade II listed The Old Post Office
- 7.4.5 An assessment of the heritage values of these assets, the contribution made by setting to that significance and the surroundings in which they are experienced was undertaken (Heritage Report Appendix E). This determined that, given the distance of separation, local topography, intervening mature trees and hedgerows and the mitigation measures embedded into the design of the proposed development, there would be no impact on the heritage values of these assets as a result of development within their settings. The grade II listed buildings character, appearance and settings would be preserved and the effect of the development on their heritage values is **none**.
- 7.4.6 The reception compound does not include any heritage assets and has been altered by the construction of Bishops Court Road and the A30. It is not within the settings of any non-designated heritage assets and makes a largely neutral contribution to two nearby non-listed built heritage assets. The effect on the historic environment of the temporary use of the reception area is **none**.

# 7.5 Landscape and Visual Considerations

7.5.1 The construction and operational phases of the proposed development have been assessed by Steele Landscape Design. The conclusions of the assessment are set out below.

#### Landscape Effects

#### Site Character

7.5.2 The baseline assessment has concluded that the development site has a Low-Medium Sensitivity to the proposed development. The two fields previously used for commercial maize production have been sown, on rotation, to grassland and would continue to be managed and grazed by sheep.



- 7.5.3 The proposed Landscape Strategy and ecological mitigation and management plan (EMMP) will improve the landscape character and visual amenity as well as enhancing the ecological biodiversity.
- 7.5.4 The significance of effect on the Land Use/Land Cover would have a Moderate Adverse impact due to the numerous solar panels that would change the character of the development site. However, this impact significance would reduce because the land under and around the solar panels would still be managed and grazed for sheep production. The protection, retention and management of the existing trees and hedgerows and the additional ecological measures would provide a considerable 'net gain' and provide a significance of Minimal, Beneficial to the landscape features.
- 7.5.5 In addition, the landform change within the development site is considered to be Slight Adverse due to the introduction of the solar arrays would actively work with the contours and require little or no land re-shaping.

#### Landscape Character

- 7.5.6 The study area is made up of two Landscape Character Types LCT 3E: Lowland Plains and 3B: Lower Rolling Farmed and Settled Valley Slopes LCT and the baseline assessment has concluded that both Landscape Character Types have a Low-Medium Sensitivity to the proposed development.
- 7.5.7 Although East Devon AONB is located within the study area, from field observations it can be confirmed that the fields of the development site cannot be seen from this designated landscape and therefore would not be impacted by the proposed development.
- 7.5.8 The effects of the proposed development on the landscape character within the study area are mainly experienced from locations within the southern quadrants of the study area. Vantage points which experience the proposed development site are from along Westcott Lane and locations within 50-260 metres of the development site boundary.
- 7.5.9 Less notable vantage points are located further afield and from distance roadside field gates at approx. 1.2km (Rockbeare Hill) and 2.7km (B3180 West Hill) from the development site.
- 7.5.10 The mitigation measures as described in the Landscape Plan 035-200 would reduce the magnitude of change with the provision of the following additional landscape features;
  - Proposed PV array tables to be positioned away from some field boundaries so as not to be experienced local road and footpath users.
  - The green infrastructure within many of the development fields would not only be protected and maintained but would also be extended and enhanced.
  - Existing boundary hedges along Westcott Lane to be protected, retained & maintained at approx. 3 metres tall and allow strategic hedgerow trees to grow and mature and further break-up the massing of the development site.
  - Existing boundary hedges around PV fields to be protected, retained & maintained at approx. 4 metres tall and allow strategic hedgerow trees to grow and mature and further break-up the massing of the development site.
  - New hedge and tree planting within DC02 and D14.



- Infill tree and hedge planting to strategic locations (D17) and disused gateways (D3 and D8).
- Ecological habitat creation and management of approx. 2 hectares that would enhance and diversify site wide wildlife habitats.

#### Cumulative Impact

- 7.5.11 A number of surrounding solar power facilities have been assessed as part of the cumulative impact of the scheme. These solar power facilities are located between 350 metres 3.2 km away from the proposed development site and are identified in section 5.3 of this Planning Statement.
- 7.5.12 The location of each of these consented solar power facilities were chosen and positioned in areas of the countryside that have very few vantage points and where the development can be experienced or seen from only a very few publicly accessed roads or footpaths.
- 7.5.13 The proposed development would not remove any trees, the fields would continue to be grazed and there is a great emphasis with a 'net gain' with additional ecological improvements throughout the site. The extent of impact that the proposed solar facility and the existing solar facilities have on the fabric/character of the landscape is considered to be negligible/minimal.

#### Summary of Findings

- 7.5.14 The overall character of the landscape within the study area as a result of changes in the landscape fabric by the proposed and operational solar facility would be considered to be **negligible/minimal** and the aesthetic or perceptual aspects of the solar sites would still be recognisable and consistent with the key landscape characteristics.
- 7.5.15 Over time the maturing native hedgerows (existing and new) would grow and be maintained thereby contributing and helping the solar development settle within the enhanced green infrastructure across this small and contained valley. The impact to the landscape character of the study area as a result of the proposed development and after the mitigation measures have matured would be seen to be **Slight Adverse significance**.

# Visual Effects

# Visual Amenity

- 7.5.16 The baseline study concluded that the visual amenity of the study area has an overall Low-Medium Sensitivity to change. Views of the development site from within the study area are restricted by the local topography and screening trees, hedges and woodland blocks.
- 7.5.17 Views toward the development site fields tend to be from Westcott Lane and other lanes / footpaths that are either adjacent to the site or within 50-250 metres. When there are views of the proposed PV fields it is typical to only see a small number of the fields in any one view. The exception to this being views from the Westcott Lane and Withybed Lane where several fields can be seen within this small and contained lowland landscape.
- 7.5.18 To illustrate the effect of solar panels within the development site the following viewpoint locations were progressed Viewpoint 1, 2, 5, 7, 8 and 11. These viewpoint assessments have confirmed that views into PV fields are from close proximity to the boundary of the development site and typically with views of single fields.



- 7.5.19 There are limited views of the development site from residential properties to the west of Marsh Green village due to the mature dense trees along the western village edge. Any potential views from residential properties to the south of Marsh Green village would, over time, be screened by the northern hedges of D10 and D11 grow to screen the eastern PV arrays.
- 7.5.20 The assessment has concluded that the majority of the visual amenity of the study area has an overall **Minimal -Slight Adverse significance**.
- 7.5.21 There is an extensive network of footpaths is the wider area (approx. 1km between Rill House and Westcott and approx. 1.5km between Marsh Green and Westcott) and for most of the footpath the development site is not visible, from only two short sections of footpath (approx. 225 linear metres) with an expected Moderate Adverse significance to the proposed development site.
- 7.5.22 Landscape Plan 035-200 has a set of proposed mitigation measures to remedy the impacts of the proposed development from local vantage points and especially from the most affected nearby footpath along Westcott Lane. The proposal would be to allow the poorly managed hedges along Westcott Lane to re-generate and then to be maintained at 3 metres tall which would enable the hedge to function not only as a viable wildlife habitat but also to screen the PV arrays from the footpath. Also, additional mitigation measures would be implemented with extra trees and hedges planted that would reinforce the existing boundary hedges and ensure that the PV array tables would become further screened, this would mitigate any views from residential properties at the east of Westcott hamlet

#### Cumulative Impacts

- 7.5.23 As regards cumulative impacts, the assessment has demonstrated that the majority of the existing operational solar facilities would not share interconnected views with that of the proposed development at Ford Oaks. The exception being a single viewpoint location (VP11 Quarter Mile Lane/Withybed Lane) as seen from a single field gate in the roadside hedge where the proposed solar development and the Strete solar facility would be seen in combination. Within this view, the Ford Oaks solar facility would be seen in the low land valley fields and set below the viewer but mostly screened by existing field boundary tall trees/ hedgerows as well as (in time) the proposed mitigation measures. In conclusion, the local solar facilities are not considered to have any significant cumulative effects on the landscape and visual receptors.
- 7.5.24 Although, there are several solar facilities located within 3km of Marsh Green village, local topography and existing trees, hedges and woodland all contribute to effectively screen these vitally important renewable power facilities from one another as well as views to and from Marsh Green village.

#### **Reception Compound**

7.5.25 The reception compound (1.26 hectares) at Bishops Court Lane (4 km west of the development site) would only be used for the duration of the construction phase and would only be seen by passing vehicles travelling at speed. The drivers and passengers would have a fleeting and oblique views toward the field where there would have a temporary and minor change to the view for a short section (approx. 50 metres) of the roadway before being screened by the local topography, trees and hedges.



# Conclusions

7.5.26 It is therefore considered that due to the careful location choice of the development site set within the discreet and contained Westcott Lane valley, the considered layout design of the PV arrays and the existing natural features of the topography, tree and hedges that the assessed impacts of the proposed development are restricted to adjacent lanes and footpaths. These impacts would be considered not to have a significant impact and that over time (5-10 years) the mitigation planting measures would further screen the proposed development without causing continuing significant effects within the Westcott Lane valley or wider countryside.

# 7.6 Ecology

- 7.6.1 Devon Wildlife Consultants (DWC) was commissioned by Taiyo Power & Storage Ltd. to undertake an Ecological Appraisal, formulate an Ecological Enhancement Maintenance and Monitoring Plan in line with the relevant guiding principles of the Devon County Green Infrastructure Strategy and the Building with Nature Standards of a site located to the west and south of Marsh Green, Devon.
- 7.6.2 Survey methodology during the initial site walkover followed the Phase 1 Survey Handbook (JNCC, 2010) with additional emphasis on searching for protected species and their field signs or identifying habitat which may support protected species. The survey report also considers ecological records obtained from Devon Biodiversity Records Centre (DBRC) and Devon Bat Group (DBG) relating to the site and its surrounding area.
- 7.6.3 Further ecological surveys have been undertaken including badger; further botanical assessment; great crested newt; potential bat roosting assessment; bat activity and wintering bird surveys. The site is utilised by commuting/foraging and roosting bats, breeding birds and commuting/foraging badgers. Overall, the botanical diversity of the grassland was found to be limited, with small areas of higher botanical diversity identified across the site.
- 7.6.4 The proposed development will result primarily in the loss or modification of low-quality grassland habitats which are considered to be of limited value to badgers, bats, and birds. Habitats which are of higher ecological value will be retained and protected. Mitigation and enhancement recommendations have fed into scheme design iteratively from an early project stage and are designed in line with Building with Nature standards. This includes retention, enhancement and buffering of existing woodland, field trees, hedgerows and riparian habitat.
- 7.6.5 Construction access roads have been designed to utilise existing gateways and avoid features of ecological value, and construction compliance measures have been provided to mitigate potential effects on protected and notable species during construction.
- 7.6.6 The scheme design includes dedicated ecological mitigation and enhancement areas located across the site and linked by habitat corridor retention and enhancement. Wildflower meadow will be created in these mitigation areas, and species-rich sheep-grazed pasture will be created around the solar panels. An ecological mitigation area including woodland planting and wet grassland will be created adjacent to a County Wildlife Site. Mitigation also includes widening of the watercourse corridor through riparian habitat enhancement, wetland grassland creation and installation of leaky dams.
- 7.6.7 Measures to enhance the site post development are provided to take into account the national biodiversity strategy detailed in the National Planning Policy Framework (NPPF) to protect and restore priority habitats and species. Schedule 14 of the Environment Act 2021



requires a minimum 10% Biodiversity Net Gain (BNG) to be a condition of planning permission in England. It is anticipated that a net gain of 121% can be achieved through onsite mitigation.

7.6.8 Overall, the report has concluded that the scheme will have a beneficial impact on local flora and fauna whilst creating to habitat outcomes as per the relevant guiding principles of the Devon County Green Infrastructure Strategy.

# 7.7 Transport and Access

- 7.7.1 A review of Crashmap Personal Injury Accident data indicates that there have been no existing highway safety concerns in the vicinity of the site that could be exacerbated by the scheme or its construction phase.
- 7.7.2 The proposals would consist of six separate access locations onto the highway network. The swept path analysis confirms that each of the accesses can appropriately to accommodate construction traffic as well as the limited number of ongoing operational movements associated with the proposals.
- 7.7.3 At its peak period, the construction phase will generate up to 44 two-way daily vehicle movements, split 20 two-way movements for staff and 24 two-way movements for HGV deliveries. The HGV deliveries will initially be routed to the Reception Compound located immediately off the A30, then escorted to the construction compound in a convoy of 4 vehicles, three times a day, outside of peak times.
- 7.7.4 This would only occur in two periods, approximately 8-weeks each, between and following which deliveries would be minimal.
- 7.7.5 The report has concluded that the identified increase in construction traffic would not have a perceptible impact on the operation of the immediate or surrounding road network given movements would occur outside of peak periods. A maximum of one two-way vehicle movements every month is anticipated to occur at the site during the subsequent operational phase. This is not material and would have no significant impact on the operation of the immediate or surrounding road network.
- 7.7.6 Based on the work undertaken to inform the Transport Statement, it has been concluded that there are no inherent safety concerns along the highway which the site will take access from. In addition, the existing accesses would be suitably modified to accommodate HGV movements associated with the construction period and the limited number of movements associated with the operational phase. The level of impact associated with the construction phase, and ongoing maintenance, is therefore not considered severe in accordance with Paragraph 111 of the NPPF.
- 7.7.7 In conclusion, having due regard to the NPPF, the Transport Statement has clearly demonstrated that the scheme would comply with national planning policy and best practice guidance. For these reasons, it is considered that there are no highways or transport related reasons to object to this planning application and that it should continue to be acceptable to both the Local Highway Authority and National Highways.

# 7.8 Arboriculture

7.8.1 The arboriculture survey identified a total of 336 records. Of these there were 246 individual tree records, and 90 group records.



- There were **20 individual veterans** recorded, and a greater number of trees that are becoming veteran or have potential veteran characteristics.
- There are **5 category A trees, and 3 category A groups**. Some of the category A trees are in prominent public locations, such as roadside trees forming part of the approach to Marsh Green, or within the surrounding lanes.
- There are **319 category B trees, and 54 category B groups**. This is a high ratio of category B trees, which reflects just how established, preserved and important the tree assemblage is on the site. Some of the category B groups also contain category C understory or sub-dominant trees.
- 7.8.2 The assessment identifies that the proposal does not require the removal of any trees during either the construction or operational phases (inclusive of traffic routes). The assessment has identified that the existing trees will benefit from greater enhancement and protection with the proposed scheme (when considered against the existing situation).
- 7.8.3 It is concluded that the proposed development will have a negligible impact on trees during the construction phase, and a high beneficial impact on trees during the operational phase and beyond.

# 7.9 Glint & Glare

7.9.1 A glint and glare assessment of the proposed development scheme has been undertaken. The results are outlined below.

#### Exeter Airport

7.9.2 The overall results of the aviation analysis for Exeter Airport are presented below.

#### ATC Tower

7.9.3 Whilst solar reflections are geometrically possible towards the ATC Tower, high-level modelling of visibility from the ATC Tower has determined that views of the reflecting solar panel area are not possible. It is therefore concluded that the development would have no impact upon the ATC Tower.

#### Runway Approaches

- 7.9.4 Whilst solar reflections are geometrically possible towards the entirety of the assessed 2-mile approach path for runways 08, the intensity of the solar reflection is predicted to have a 'low potential for temporary after-image'. This is considered as acceptable within the relevant guidance.
- 7.9.5 All solar reflections predicted towards the runway 26 approach would occur outside of a pilot's field of view, or not be geometrically possible at all, and therefore low to no impact is expected.
- 7.9.6 It is therefore concluded that the development would not have a significant impact upon aircraft on either of the assessed 2-mile approach paths.



# Road Receptors

- 7.9.7 The assessment states that while solar reflections are geometrically possible towards the A30, the solar reflections will be screened by existing vegetation, which will be subsequently supplemented with additional proposed vegetation as part of the proposed development.
- 7.9.8 It is concluded that the proposed development will have no impact on users of the A30.

# Dwelling Receptors

- 7.9.9 The results of the analysis have shown that solar reflections from the proposed development are geometrically possible towards 33 of the 52 assessed dwelling receptors (dwelling receptors 1–18 and 38-52).
- 7.9.10 At the remaining dwellings, solar reflections are predicted to be screened by existing vegetation and/or buildings.
- 7.9.11 For six of the 33 dwelling receptors where solar reflections are geometrically possible, solar reflections may be at least partially visible to dwelling receptors. Further analysis was completed on these dwellings and it was found that no mitigation was required for 5 of the 6 dwellings identified.
- 7.9.12 For the identified remaining one dwelling, whilst there is some intervening existing screening, views of the nearest area of reflecting solar panels are anticipated. Screening is not a viable mitigation solution due to the raised elevation of the dwelling relative to the reflecting panel area and the composition of the existing hedgerow. Layout optimisations have been completed, such as varying the geometric characteristics of the solar arrays (so oriented towards the south-east), which reduces the duration over which any solar reflection could occur.
- 7.9.13 The resultant optimisation has reduced glint and glare effects to acceptable levels such that no further mitigation will be required.

# 7.10 Geo-Environmental

7.10.1 The British Geological Survey (BGS) indicates that the site is underlain by the following geological sequence:

#### Figure 7.1 Geological Sequence

Geological Unit	Туре	Descriptions	Aquifer Classification
	Alluvium	Clay and silt and sand and gravel in the centre of the site associated with the unnamed water "Ford Stream"	Secondary A
Drift	Head	Head deposits 1 and 2 comprising clay silt sand and gravel two sets to the north and the south of the site and on the valley sides.	Secondary Undifferentiated



Solid	Aylesbeare Mudstone Group	Majority Sandstone with a thin band of Mudstone in the centre of the site	Secondary A (Sandstone), Secondary B (Mudstone)
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7.10.2 The Geo-Environmental Report confirms that:

- There is no Made Ground on or surrounding the site.
- There are no records of landslips on or near to the site.
- The site is not located within a Source Protection Zone.
- The site is not located within an area of potential coal mining.
- 7.10.3 The report concludes that there are negligible risks associated with land quality at the site. Any contamination is likely to be localised and can be removed and remediated during development.
- 7.10.4 Based on the desk study information and given the potential underlying ground conditions and the variably of the materials it is likely that lightly loaded structures/ solar panels could be constructed on a raft or shallow foundation, however localised reinforced may be required in the centre of the site due to the presence of Alluvium.
- 7.10.5 The Geo-Environmental report concludes that the proposed development does not pose a significant effect or risk to ground conditions on the site or wider area and can be provided on request.

#### 7.11 Other Considerations

- 7.11.1 The proposed development is a passive development in that there will be no pollution or emissions of gas, light or waste, will not cause a risk of accidents or impact on human health. The proposed new habitats will provide an enhancement in biodiversity and reduction of surface waters flowing over the lanes and standing on the local villages' roads.
- 7.11.2 The only potential for noise generation will be from the sub-stations, however noise from this equipment is minimal and the equipment is located a significant distance from any residential receptors which will result in an in-audible scheme.



# 8.0 Sustainability Statement

- 8.1.1 The proposed Solar and Green Infrastructure facility will deliver significant benefits through the generation of renewable energy and a net gain in biodiversity and green infrastructure. It will help East Devon District Council to achieve the 3rd priority of the East Devon District Council Climate Change Strategy 2020-2025, to enable the development of secure supplies of renewable and low carbon energy for individuals, communities, business, and industry.
- 8.1.2 The proposal will follow Local Plan Strategy 39 Renewable and Low Carbon Energy Projects, which is a positively worded renewable and low carbon planning policy which states renewable or low carbon energy commercial development would be encouraged in the Council's administrative boundary, assuming environmental and heritage sensitivities can be appropriately mitigated against.
- 8.1.3 The proposed development also accords with the principles of the Devon County Green Infrastructure Strategy as follows:
  - **Planning for green infrastructure at the outset**: The proposed development seeks to provide a significant quantity of green infrastructure across the site.
  - **Ensuring Resilience in water and flood management**: The proposed development seeks to offer an offsite betterment.
  - **Protecting and enhancing biodiversity**: The proposed facility provides a 121% biodiversity uplift.
  - **Conserving, enhancing and strengthening links with Devon's landscape**: The proposed development seeks to strengthen and enhance local landscape features. The LVIA has concluded that the proposed development will not cause significant effects on the landscape.
  - **Conserving and enhancing the historic environment**: The proposed development has sought to ensure that existing archaeological assets are protected. The Heritage assessment submitted alongside the planning application has concluded that the proposed development will not have a significant impact on heritage assets.
  - **Enabling access, fitness and contact with nature**: The proposed development seeks to provide biodiversity uplift and nature corridors.
  - Securing Local Food Supply: A large proportion of the proposed development site will be retained for grazing,
  - **Responding to Climate Change**: The Proposed Development seeks to respond to Climate Change through the provision of clean, local and renewable energy.
- 8.1.4 National planning policy makes it clear that renewable energy proposals are not required to demonstrate the overall need for renewable or low carbon energy and notes that local planning authorities should recognise that even small-scale projects can provide a valuable contribution to cutting greenhouse emissions.
- 8.1.5 The locational need for the development is clear, as the 30MWp of renewable energy that would be exported by the Solar and Green Infrastructure facility would be fed into the National Grid via a point of connection onsite. The projected c.37,000MWh annual power


generation is equivalent to the power consumed by c.18,500 homes across the EX5 2 postcode area during 2020.

- 8.1.6 The proposed renewable energy scheme seeks to strengthen existing green infrastructure on site, proposes new ecology networks and provides a biodiversity gain of 121%. The scheme aims to be the first of its kind to achieve the Building with Nature Accreditation with further highlights its sustainability credentials.
- 8.1.7 Chapter 7 of this Planning Statement has demonstrated that the proposed development will not give rise to any significant adverse effects on agricultural land use, flood risk, heritage, public rights of way, ground conditions, ecology and biodiversity, landscape and visual impact, transport, arboriculture and glint and glare.
- 8.1.8 The proposed development can therefore be considered as truly sustainable, providing a local and secure renewable and low carbon energy whilst providing a substantial biodiversity uplift in the area.



## 9.0 Conclusion

- 9.1.1 For the reasons outlined in this Planning Statement, it is considered that the Proposed Development is in accordance with the relevant planning policies and guidance at both the national and local levels.
- 9.1.2 The Proposed Development represents a clear form of sustainable development, generating clean renewable energy and helping reduce carbon emissions which are required to meet the Governments net zero target.
- 9.1.3 The Proposed Development would export up to 30 MWp of clean renewable electricity to the National Grid, equivalent to the annual c.37,000MWh electrical consumption of approximately 18,500 family homes across the EX5 2 postcode area during 2020. The anticipated CO<sub>2</sub> displacement is around 8,626 tonnes per annum. This should be afforded substantial weight in a planning decision.
- 9.1.4 The Proposed Development will also provide significant biodiversity enhancements (121% biodiversity net gain), allow for soil regeneration, greatly improve Green Infrastructure corridors and connectivity and represent an important farm diversification project, with indirect socio-economic benefits, at a time when the agricultural land is becoming more challenging to farm due to climate change factors.
- 9.1.5 Overall, there is an urgent requirement for the Proposed Development; it is entirely suitable to the Site and its surroundings; it accords with national and local planning policy and all relevant material planning considerations; and will deliver significant environmental benefits.



**Appendix A – Screening Request** 

Separate Document Submission



**Appendix B - Screening Opinion** 

Separate Document Submission



Appendix C - Pre Application Response

Separate Document Submission



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