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FAO: Jane Baker – Planning Case Officer

**Statement of response to comments made regarding the planning application S/079/01078/22.**

This statement has been written by SPD-Studio on behalf of Push (the "Applicant") in response to the public comments made regarding the proposed development of a ground mount solar array on land at Hatton, Great Sturton, Horncastle. It is noted that a number of public objections have been received in relation to application S/079/01078/22 and the Planning Officer is reminded that only material planning considerations are to be used when determining this planning application.

For the avoidance of doubt, we are mindful that objectors have submitted documentation and comments which raises concerns of the proposed development. This addendum is intended to provide additional clarification to these points, where each header represents a distinct objector theme.

**Principle of Development**

In the 21st century, climate change is a recognised phenomenon of international signification. The scientific evidence on this phenomenon is overwhelming, with the UK government seeing it as 'undoubtedly one of the most pressing global challenges of our time'.

Paragraph 158 of the National Planning Policy Framework ("NPPF") states that when determining planning applications for renewable and low carbon development, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.

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

It should be noted that East Lindsey District Council have not identified or allocated any locations in suitable areas within their policies for solar generation, although they promote and encourage the exploitation of a range of renewable and low carbon sources across the district, including photovoltaic solar (Chapter 14 of Adopted Core Strategy 2018).

Since adopting the East Lindsey Core Strategy 2018, East Lindsey have published a Climate Change Strategy (2022), which advises that, *"nationally, renewable energy generation continues to grow with 42% of electricity produced in 2020 from wind, solar, water and wood compared with 41% generated from gas and coal plants. If this growth on the path to net zero is to continue however, small scale renewables solutions together with larger scale developments are going to be essential to achieving the net zero aspirations".* This statement is in line with the aspirations of Chapter 14 of the Core Strategy through the promotion of renewable and low carbon energy sources across the district and should be taken into consideration when applying the planning balance on this proposal.

A vision of the Core Strategy (1.11) is to *'achieve our vision of a commitment to tackling the causes and effects of global climate change through local action include of supporting the use of renewable energy'.*

On 7 April 2022 the government published their Energy Security Strategy that signals an intent to amend the planning rules to favour solar development and sets a national ambition of deploying 70GW of solar generation capacity by 2035 in the UK (currently 14GW). In these unprecedented times, the benefits and need for renewable energy outweighs any potential local impacts, in keeping with policy "SP27 Renewable and Low Carbon Energy" of the Core Strategy.

**Site Location**

Paragraph 124 of the NPPF requires viability to be taken into account when considering the efficient use of land.

This project has been under development for several years. It has proven to be very challenging to identify a suitable location that is technically and economically viable as each site investigated had advantages and disadvantages that on balance rendered the alternative sites unviable.

As explained in the section 2 of the accompanying submitted planning statement, for the project to be viable, the candidate location must not be too distant from the point of grid connection. This is due the costs and technical challenge of laying a long cable becoming more significant the further away the solar array is located to the site. In this case we

consider the maximum economically viable distance to be approximately 5km. Further details are expanded on the site selection process are advised within section 2.3 of the accompanying planning statement and should be read in conjunction to this addendum statement.

A cursory assessment of the existing roof and unused ground areas within the search radius showed that these would be completely inadequate to host a meaningful amount of solar generation equipment, as they are simply too small for the grid connection. The scheme simply would not be viable through the use rooftops and brownfield land.

Consequently, for the aforementioned reasons it can be deemed that the proposed development is in accordance with Policy SP27 as the proposed scheme would make provision for renewable energy generation, of scale and design appropriate to its location.

**Site Infrastructure**

Solar panels contain photovoltaic (PV) cells that convert photons (i.e. sunlight) into electrons of direct current (DC) electricity. The DC current is then converted into an alternating current (AC) by inverters located within the site boundary, which is then sent via underground cable to the DNO (Distribution Network operator) substation situated to the south west of the main development site.

Unlike fossil fuels such as coal, generating electricity from renewable sources like solar power creates no emissions that are harmful to human health and the environment. The solar PV panels will be attached to mounting frames, pile driven into the ground and during their lifetime will be cleaned simply with water.

The proposed development arrays are temporary and removed from the site at the end of the project. Nearly 99% of the solar panels are comprised of glass, silica, aluminium, steel, copper, and plastic which are largely recyclable with a good salvage value. Organisations around the UK and Europe specialise in solar recycling and are working closely with solar developers to minimise electrical waste and recycle old panels. As a result, the environmental impact of decommissioning a solar development is minimised.

On the contrary to the above, the development does include the proposal of 132kv DNO substation plans submitted (P044.307) with the application provide details on this substation. The substation will be owned and managed by the DNO.

The proposed development has further been designed and would be constructed in accordance with "SP16: Inland Flood Risk" in the adopted core strategy. It is recognised that part of the site is to be situated within a flood zone 2, it includes design and layout features of the proposed development deliberately render it adaptable to climate change.

**Landscape Visual Impact**

NPPF paragraph 174 seeks to ensure planning policies and decisions contribute to and enhance the local environment.

The NPPG for renewable energy (2015) recognises that, "*the deployment of large-scale solar farms can have a negative impact upon the rural environment, particularly in undulating landscapes*". However, the NPPG also advises that, *"the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively."*

The East Lindsey planning policy map confirm that the application site is not located within any Area of National Beauty, Site of Important Nature Conservation, Site of Specific Scientific Interest, Local Nature Reserve, or Special Protection Area. It is however, recognised that the site is situated within landscape character areas of Wragby to Horsington Vale Woodland and Farmland [1] defined as a rural landscape. It is not disputed that the area is of a rural landscape as defined in the landscape charter assessment 2009.

A Landscape Visual Impact Assessment ("LVIA") was completed by James Blake Associates a registered practice of the Landscape Institute with over 25 years' experience of providing Environmental Impact Assessments, LVIAs and public inquiries in residential, commercial, transport, mineral extraction, and wind farms.

Their assessment recognised the impact of the proposed development on the National Planning Policy Framework, including Paragraphs 149. 154, 170 and 171, and impact on the East Lindsey Core Strategy (Adopted) 2018. The LVIA concluded that the Proposed Development would not result in significant harm to the landscape character.

The LVIA has subsequently been updated to include that the development is to be instated for a duration of up to 40 years, however in conclusion of this report it is not deemed to alter the conclusion which JBA have made. It is reminded to the case officer and councillors that the LVIA should be read in conjunction with all submitted planning reports and drawings when applying the planning balance on decision making.

**Countryside Development**

Great Sturton and Hatton are small hamlets with the main cluster of houses around the Churches of 'All Saints' and St Stephens' with a further scattering of dwellings along Sturton Road. Dwellings are predominantly detached and of a medium to large size. There are a handful of agricultural buildings along Sturton Road, including Grade II Listed Corner Farm, which add to the rural character of the surroundings.

[1] Landscape Character Assessment, Part 2, Section A to E - https://www.e-lindsey.gov.uk/media/9431/CD74-Lanscape-Character-Assessment-Part-2-SECTIONS-A-TO-E/pdf/CD74_Lanscape_Character_Assessment_-_Part_2_-_SECTIONS_A_TO_E.pdf?m=636644988817530000

The site is situated within landscape character areas of Wragby to Horsington Vale Woodland and Farmland defined as a rural landscape. It is not disputed that that the area is of a rural landscape as defined in the landscape charter assessment 2009.

However, as evidenced in the LVIA the majority of views are screened or are areas where if perceived, the panels form a small component of the wider view, and therefore might be missed by a casual observer. Of the two viewpoints from the foot of the Lincolnshire Wolds AONB, none experience any change in view. In this way, the wider setting, and establishment of a solar PV development has been well considered and the key landscape and visual characteristics remain intact. Overall, the influence of the development proposals on the surrounding landscape is not considered to be harmful in accordance with paragraph 174 of the NPPF and SP27 of the Core Strategy.

**Highways**

A Transport Statement was completed by Local Transport Projects Ltd, a registered practice of the Landscape Institute with over 18 years' experience of providing highway design, transport studies and road safety audits, in residential, commercial, transport, and master planning.

At the time of writing this addendum statement, Lincolnshire County Council highways have requested additional information to be provided by the applicant. This information included swept path analysis of HGV movements, assessment of alternative routes and automatic traffic count. This information has been provided to East Lindsey and Lincolnshire County Council to consultant upon, with their comments on the scheme pending.

It is considered that the proposal is in accordance with Policy 110 of the NPPF and SP22 of the Core Strategy, as the site is deemed to have safe and suitable access to the site by all users. The Applicant confirms they welcome a condition for a Construction Traffic Management Plan, which would provide details of construction phase of the development, including how large vehicles will be managed during the construction period.

**Agricultural and BMV Land Use**

The NPPF seeks to enable *"the development and diversification of agricultural and other land-based rural businesses",* and for decisions to contribute to and enhance the natural and local environment, including *"the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land"*. [Paragraph 84b and 174b]

Specific site selection has been explored further in section 2 of the accompanying planning statement however in summary the use of the agricultural land has been shown to be necessary for the following reasons:

- No previously developed sites were deliverable and developable within the study area as previously developed sites are typically retained for built development, such as housing, employment, leisure or town centre uses.

- Solar farms are not considered to be as beneficial in urban areas due to the large space requirement means they would prevent regeneration; and the development may not work well if shading from other buildings existed.
- In the context of the climate emergency and net zero legislation, rooftop solar offers an additional option rather than an alternative due to scheme sizes.

Further to the above, due to the number of comments made upon the application in relation to agricultural land use (BMV land) and food security. It was deemed by the appellant that an agricultural land classification would be undertaken as further supporting evidence.

This report was undertaken by Soil Environmental Services Ltd in September 2022. This survey has resulted in an Agricultural Land Classification of the following grades:

| Grade | ha | % |
|---|---|---|
| 2 | 4 | 5.27 |
| 3a | 56 | 73.68 |
| 3b | 16 | 21.05 |

The proposal would replace the agricultural use of the two fields. The presence of the PV panels and other infrastructure should not necessarily prevent agricultural use entirely and the loss would be of a temporary nature, albeit 40 years is a considerable period.

The NPPF defines the Best and Most Versatile (BMV) agricultural land as being in Grades 1, 2 and 3a and on this basis, a large proportion of the site would be classified as BMV land.

However, there is a precedent within East Lindsey as well other England Authorities that the planning balance applies in these types of schemes as the significant benefits would arise sufficient to address this conflict along with the temporary loss of BMV land.

Application Reference S/195/02340/20 at land at Low Farm, Wainfleet St Marys was approved by East Lindsey Council Planning Committee at a meeting dated 25th March 2021, and subsequent approval decision notice issued on 29th March 2021. Description of the development was as followed:

*'Construction of a temporary 49.9MW solar farm, to include the erection of ground mounted solar panels with transformers to the maximum height of 2.46 metres, a 132KV substation, a DNO control room, a customer substation, GRP communications cabin, erection of security fencing and provision of landscaping and other associated infrastructure.'*

The development was approved although situated on land defined by the Framework as best and most versatile. 30.7ha of the development was Grade 1, 36.7ha of the development was Grade 2 and 18.0ha was sub Grade 3a land.

It was advised in paragraph 7.83 of the supporting officers committee report that… "*it is clear that the use of high grade agricultural land is a material consideration and the benefits*

*of high grade land should be recognised. This is not lost in the application and the policies do not go as far as saying that high grade should be retained, it is merely one of many considerations. Given the wider national and local support for renewable energy and on the basis that the application is acceptable in all other regards, the loss of agricultural land (albeit of a temporary 40 year period basis) is not grounds for refusal."*

This officers report further relates that the use of BMV land is only one material consideration in these types of planning applications, and therefore the planning balance based off all material planning considerations and negates of the scheme rather than making a decision based on one consideration.

It is further emphasised by the developer and applicant that solar farms cannot simply be located anywhere, there are in fact very limited locations where suitable connections can be made which are discussed in section 2 of the supporting planning statement. Other factors than agricultural land need to be taken into account, such as avoiding land within the Green Belt, Area of Outstanding Natural Beauty (AONB) and Sites of Scientific Interest (SSSIs).

Application Reference S62A/22/0000004[2] , 'Land east of Parsonage Road and south of Hall Road, Stansted, Essex CM22 6PL' was allowed and planning permission granted for 14.3mw solar photovoltaic farm and associated infrastructure in August 2022.

The Inspectorate stated that *"there is undoubtedly a strong preference that schemes that remove or limit agricultural productivity should, wherever possible, be directed towards areas of lower grade agricultural land. I deal in full with alternative locations, but this site is proposed to take place on land for which the majority is BMV."*

In paragraph 38 of the appeals statement of reason, it was determined by the Inspectorate that the development... *"would not represent a total loss of agricultural land. The mounting for the PV panels would allow for restoration to full agricultural use, subject to appropriate soil management, and during operation, there are well document options for alternative agricultural use to take place alongside the operation of the site; such use can be secured through conditions. Nonetheless, the use of some BMV does not sit comfortably with guidance, although this does not preclude such development, and I acknowledge that the use will be temporary and must be considered against the benefits of the scheme"*

Its further argued in the decision report that similarly to East Lindsey District, land across Uttlesford District Council is predominantly BMV land (as defined by the NPPF) and therefore a solar scheme would be unable to avoid it.

Its highlighted again that East Lindsey District Council have not identified or allocated any locations in suitable areas within their policies for solar generation, although they promote the encourage the exploitation of a range of renewable and low carbon sources across the

[2] Application Reference:
S62A/22/0000004https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1100200/S62A_22_0000004_decision_notice_and_statement_of_reasons.pdf

district, including photovoltaic solar (Chapter 14 of Adopted Core Strategy 2018). East Lindsey Council are clear for the need of renewable energy across the district, and section 2 of the supporting planning statement further discusses as to why the site brough forward is deemed the most applicable site for a development of this size.

From the Agricultural Land Classification report provided while the land proposed to be used is categorised as BMV land, as defined by the NPPF, the report clearly illustrated how farming of agricultural land over time lowers the land grading. Grading on the MAFF (1983) 1: 250 000 provisional maps indicated the site is mapped as Grade 2 and Grade 3 land, whereby the land was predominantly graded as grade 2 land, however as illustrated from the supporting Agricultural Land Classification Report, it is clearly shown that the land has predominantly dropped a grade to 3a and 3b land. On planning balance therefore, the benefits of the scheme should be considered on the planning balance of this scheme.

**Public Rights of Way**

As advised in the accompanying planning statement, there are various Public Rights of Way on, or in proximity to the site, which are illustrated on supporting plan P044.300. Paragraph 100 of the NPPF states that "planning policies and decisions should protect and enhance public rights of way and access".

The Proposed Development has been designed to protect the Public Rights of Way on site by providing a buffer zone around the PROWs to reduce any adverse impact.

Comments have been raised by members of the public in relation to permission footpaths on the site. It is considered that following the feedback from the public consultation event, the proposal was re-designed to accommodate for the permissive footpath located off of the southern boundary of Sotby Woods. This will now be retained for public access.

The proposed development would also provide additional maintenance to the PROWs by maintaining the grassland surrounding the bridleway, allowing for better access by the public. The additional screening proposed at the site will also reduce visual impact of the solar farm. It is therefore considered that the development is in accordance with paragraph 100 of the NPPF and "SP25 Green Infrastructure" of the Core Strategy.

**Residential Impact**

Core strategy Policy CP3 requires new development to promote health, economic and social well-being, amenity, and safety of the population. Policy SP27 gives support to renewable generation in rural areas where the proposed development is appropriate in scale and design to its location, responds to climate change, meets the needs of water infrastructure, and provides any necessary mitigation measures. These requirements are echoed within paragraph 185 of the NPPF.

Regarding residential visual impact, it has been identified by the LVIA that 'although there will be localised visual and landscape effects, the proposed development will not dominate

the view and will be a small component within a wider landscape. Strategic landscape infrastructure retained mature hedgerows and enhancement of existing vegetation will help to visually integrate the development into the surrounding landscape. The proposal responds to the local context in terms of character and visual sensitivities. The nature of the solar PV panels, ease of removal at end of useful life and the minimal impact to landscape character and visual amenity lend this Site to the proposed use.'

The Proposed Development includes appropriate mitigation measures to reduce visual impact; these have been confirmed suitable by the applicant's LVIA, and further reconfirmed after evaluating the alternative LVIA submitted by objectors. The Applicant is favourable to a condition of the development which requires a Landscape Ecology Mitigation Management Plan, which would provide details of the management of the landscape and ecological measures proposed for the lifetime of the development.

Paragraph 174 of Section 15 of the NPPF seeks to prevent new development from contributing to an unacceptable risk of noise pollution. The Applicant has already noted that the only sound that would be audible outside the site boundary arising from the Proposed Development would occur during the construction period, notably during the installation of the mounting piles. Once constructed, the extremely faint electrical noise arising from the Proposed Development was quantified in the application as not being audible from outside the site, and hence have no impact on surrounding local residents or residential amenity.

The Applicant restates that the Proposed Development does not make use of outdoor artificial lighting at the site and reiterates that no light pollution would be produced.

The application further restates that no electrical charged fencing will be used around the site, and CCTV will only face into the site development area for safety precautions.

The Applicant notes that solar PV panels are designed to absorb, not reflect, solar irradiation, and that they are in any case arranged in south-facing rows making it impossible for any hypothetical reflection to be visible at or near to ground level to the north of the site. The Applicant notes that the latest draft of the National Policy Statement for Renewable Energy Infrastructure (EN-3)[3] recommends that applicants should consider using solar panels with non-glare/non-reflective front glass and for the front of the panels to have an anti-reflective ("AR") coating. The Applicant confirms compliance and notes this advice is already out of date given that virtually all manufacturers already incorporate these features into their products; one would struggle to purchase solar panels devoid of these features.

[3] Draft National Policy Statement for Renewable Energy Infrastructure (EN-3) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015236/en-3-draft-for-consultation.pdf

**Glint and Glare**

Neo-Environmental were instructed to undertake a glint and glare assessment of the site, which considered the potential impacts on ground-based receptors ie. roads and residential dwellings.

Overall, it was concluded that the effects of glint and glare of the proposal and their impact on local receptors has been "analysed in detail and the impact on all receptors is predicted to be None, and therefore No Effects". The proposed development is considered to be in accordance with Strategic Policy 23 of the East Lindsey Local Plan.

The Applicant further notes the proposal of landscape mitigation measures across the site and reiterates the welcoming of a condition imposed by the LPA, which requires a Landscape Ecology Mitigation Management Plan. This would provide details of the management of the landscape and ecological measures proposed for the lifetime of the development.

**Heritage**

It is recognised that there are multiple designated structures whose setting may be impacted by the proposed development. Paragraph 194 of the NPPF states that relevant historic environment record should be consulted and the heritage assets assessed using appropriate expertise where necessary. As a result, a Heritage Assessment was prepared by Oxford Heritage.

The Heritage Appraisal recognised that the proposed solar scheme will be visible in some views of the heritage assets. However, the assessment has confirmed that the level of harm is deemed to be 'less than substantial on a scale from none to high'.

Additionally, it deemed the scheme could provide positive enhancements for the historic environment by restoring the hedgerow bank along the south side of the site and introducing a hedgerow boundary to the west of the site.

Comments have been made by Lincolnshire Heritage concerning the development in relation to the heritage assets. Our heritage consultants working on the project (Oxford Heritage) have been provided Lincolnshire Heritage comments and provide the further dialogue. It is agreed that there is a minor impact on intervisibility between the historic buildings, which becomes greater where the array comes close to the listed Corner Farm. However, it is considered that in terms of mitigation this moderate impact could be fairly simply reduced by revisiting the boundary treatments along the southern boundary of the site. The applicant is willing to revisit the boundary treatment of the site ie. maintaining hedgerows along the southern boundary at a higher minimum height to screen the development as much as possible, if deemed necessary by the Local Planning Authority.

The second point which was raised by Lincolnshire Heritage was regards to the historic landscaping itself. We do not disagree that this land has been farmed for its history, and there is no precedent for any kind of commercial to light industrial se that could come close

to comparable in appearance to a solar array. However, the scheme has mitigated the impact through the retention and implementation of proposed hedgerows around the scheme, and as discussed above the applicant is open to discussions to further mitigation measures around the site boundaries i.e. altering hedgerows heights. However, it is negligible to not apply the planning balance within this argument.

In the 21st century, climate change is a recognised phenomenon of international signification. The scientific evidence on this phenomenon is overwhelming, with the UK government seeing it as 'undoubtedly one of the most pressing global challenges of our time'. Its furthermore vital from a public benefit argument that renewable energy proposal are approved given the energy insecurity creased by rising gas prices. Section 6 of the supporting planning statement further assesses the social, economic and environmental benefits of the scheme.

**Flood Risk**

Paragraph 159 advises that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)'.

A detailed Flood Risk Assessment by Synetrgra Group in February 2022 provides a detailed analysis of the proposed development in relationship to flood risk. It is reminded to the case officer and councillors that the Flood Risk Assessment should be read in conjunction with all submitted planning reports and drawings when applying the planning balance on decision making.

**Construction**

Comments have been raised as to the potential disruption caused by the constriction phase of the development. The applicant has already noted that the only sound that would be audible outside the site boundary arising from the Proposed Development would occur during the construction period, notably during the installation of the mounting piles. HGV vehicle movement will also only take place during the construction and decommission stage of the development. A Construction Management Plan has been submitted as part of the application which provides an overview of the management of the site during the constriction period.

The applicant is further willing to have a condition which restricts construction times between 8am-5pm if deemed applicable by East Lindsey Council, to reduce disruption to neighbours as much as plausible during the construction and decommission stage of the development.

**Biodiversity**

A preliminary ecology survey was undertaken at the site in December 2021, which has been submitted as supporting documentation of this application and should be read in conjunction with this statement.

As mentioned in the supporting planning statement, further surveys where required as concluded within the preliminary ecology appraisal. A Great Crested Newt (eDNA) survey was undertaken at the site in May 2022, whereby it was concluded that GCN are not considered to be currently using the pond and are considered absent from the site. A bird breeding survey, water vole and otter survey have been undertaken on the site in August 2022. These reports have been submitted alongside this addendum statement, however in conclusion, subject to mitigation and enhancement measures the development is deemed acceptable.

The applicant welcomes an agreement with the LPA to condition the submission of a Landscape Ecological Mitigation Plan, which provides detail into the appropriate mitigation and enhancement measures mentioned in all applicable ecological reports undertaken at the site.

The applicant welcomes a condition of the scheme which would require details of ecological management for the duration of the scheme.

**Other Comments**

**Public Consultation -**

Comments have been raised as to the notification and attendance at the public consultant event. The Applicant asks that the Statement of Community Involvement is fully assessed, as provides reiteration as to the processes and procedures which were undertaken prior, during and after the event.

**CO2 Claims -**

Comments have been made as to the increase of CO2 levels caused by solar panel production. It is not contested that Climate Change is one, if not the most prevalence issue to face the UK in the coming years. The Climate Change Act 2008 sets a legally binding target to reduce greenhouse gas emissions by at least 80% by 2050 against a 1990 base. Renewable energy from solar farms is required in addition to wind power to accomplish and sustain this goal, and to maintain greenhouse gas and CO2 emissions below this level on a permanent basis. Only by efficiently decarbonising our economy can we secure a healthy living environmental for all of our communities.

As with all manufactured products, some carbon is emitted in the manufacturing of solar panel. However, the claim that solar panels produce more carbon than they save is one of falsity. A study recently published by Nature Energy and quoted by Solar Energy UK illustrates that conclusive evidence that solar reduces carbon emission, with an average carbon payback period for solar panelling being approximately 1-4 years. Therefore over the lifetime (typically 40 years), each panel will generate zero-carbon and zero-pollution electricity for decades, after any carbon emitted in its production has been paid back. [4]

[4] Solar Energy UK, Everything Under the Sun, Facts About Solar, March 2022, Pg.14 https://solarenergyuk.org/resource/everything-under-the-sun-the-facts-about-solar-energy/

## Recycling

Comments have claimed that solar panel materials are not recyclable. However, in most cases, 99% of a solar panel is recyclable. There are organisations around the UK and Europe specialising in solar recycling, such as PV cycle and the European Recycling Platform. They are currently working with solar developers to minimise any electrical waste and recycle old panels in line with the Waste from Electrical and Electronic Equipment (WEEE) regulations [5].

## Current UK Politics

There has been much media attention around politicians' views in solar farms. It is It is reminded to the case officer and councillors that the decisions on this application should be made in relation to adopted planning policies and not politicians' views in the media.

## Conclusion

The proposal is for the Construction of a 49.9MW Solar Farm for a 40 year period, to include the installation of Solar Panels with transformers, a 132kv substation, and other associated infrastructure.

The requirement for renewable energy generation is well supported by National and Local Planning Policy. There is a clear need for new electricity generation capacity and flexible energy generation from various sources. These are a necessary and vital part of the Government's Strategy for the decarbonisation of electricity generation and supply security.

The proposed development at Hatton demonstrates the opportunity to significantly improve the existing site by contributing the UK's renewable energy commitments. It also aligns with East Lindsey District Council's net zero target by 2040 and supports sustainable energy generation and adaptation to the challenges presented by climate change.

Both National and Local policies support the principle of renewable energy such as that proposed. However, that support needs to be balanced against other policies, which seek to protect issues such as heritage assets, valued landscapes and biodiversity interests. This supporting addendum further highlights the key issues being considered and in each case concludes that the proposal does not conflict with policy, either with or without conditions.

In conclusion, there is much policy support for the application. Whilst it does involve the loss of agricultural land for a period of 40 years this does not equate to grounds for refusal because the benefits of the scheme and the wider policy support outweigh this.

[5] Solar Energy UK, Everything Under the Sun, Facts About Solar, March 2022, Pg.15 https://solarenergyuk.org/resource/everything-under-the-sun-the-facts-about-solar-energy/

This conclusion has been arrived at having taken into account all other relevant material considerations, none of which outweighs the reasons why this development should be approved.

Summary of Submitted Documents/Amendments:

- Agricultural Classification Report, Soil Environmental Services Ltd, September 2022.
- Construction Access Routing (Overview), Local Transport Projects, LTP 4899 T2 00 01
- Construction Access Routing (Swept Path Analysis), Local Transport Projects, LTP T2 2899 00 01
- Substation Compound LTP 4899 T3 01 01
- Response to Lincolnshire CC Highway Comments.
- Landscape Visual Impact Assessment, James Blake Associates, Updated September 2022.
- GCN (eDNA) Survey, James Blake Associates, May 2022
- Bird Breeding Survey, James Blake Associates, August 2022.
- Water Vole and Otter Survey, James Blake Associates, August 2022.