

Town & Country Planning Act 1990

Planning Appeal

Proof of Evidence

By

David Wordsworth

On behalf of

East Lindsey District Council

Development: Planning Permission - Installation of a temporary ground mounted 49.9MW solar farm with associated infrastructure, construction of vehicular accesses, CCTV cameras on 2.5m high poles a 15m high communications tower and security fencing to a maximum height of 2.2m.

at

Appeal Site: Land Adjacent Sotby Woods, Sturton Road, Hatton

Appellant: Hatton Solar Farms Limited

Local Planning Authority ref: S/079/01078/22

Appeal ref: APP/D2510/W/25/3363157

August 2025

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1.0 WITNESS INFORMATION & SCOPE OF EVIDENCE

1.1 My name is David Wordsworth; I hold a Degree in Town and Country Planning and post-graduate diploma in Town Planning from Birmingham City University. I am a Chartered Member of the Royal Town Planning Institute. Planner with 26 years' experience of working within Development Management, at Senior Planner, Principal Planner, Team Leader and Group Leader roles. I have been a Freelance planner for the past 12 months and have recently been instructed by East Lindsey District Council on this Appeal.

1.2 I will provide evidence on the planning balance and the application of policies within the Development Plan and the NPPF (The Framework) CD7. This will consider whether the agreed benefits of the scheme outweigh the cumulative impact of less than substantial harm upon the setting and significance of Sturton Harden Corner Farmhouse (Grade II listed) and harm to the countryside character and visual impact of the area.

1.3 This evidence will not describe the detail of the Application, the Appeal Site or the planning history as it is covered in the Planning SoCG (CD8) and the Council's SoC (CD8).

1.4 I have visited the site and can confirm that the contents of my evidence are my professional opinion and are true and gained from my own direct knowledge, except where indicated, on the matters that I'm giving evidence on for the Council's case.

2.0 INTRODUCTION

Development Proposed

2.1 The appeal proposal (as described in paragraph 3.01-3.02 of the SoCG) seeks full planning permission for the installation and operation of a ground mounted solar farm of around 49.9MW that would generate and deliver electrical power to the local distribution network. The scheme would be operational for up to 40 years and seeks permission for 40 years plus up to 1 additional year each for construction and decommissioning, totalling 42 years. Solar panels will have a maximum height of 3m above ground level and installed on south facing rows and a security fence will surround the site.

Site

2.2 The site (as described paragraph 2.01-2.11 of the SoCG) is located on approximately 180 acres of agricultural land spread over 5x parcels of land. The site is gently undulating and lies approximately 4km to the west of the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB). There are residential properties in close proximity to the site one of which, Sturton Harden Corner Farmhouse is Grade II listed.

Renewable Energy Policy Context

2.3 As set out within the SoCG (paragraph 6.42), there is a body of evidence that demonstrates the importance and significance of renewable energy and the role that the planning system plays in its delivery.

2.4 EN1 - (Overarching National Policy Statement for Energy- January 2024) (CD7) identifies the Net Zero Strategy published by the Government in 2021 that sets out a vision for transitioning to a net zero economy and the policies and proposals for decarbonising all sectors of the UK economy to meet the UK's net zero target by 2050.

2.5 The government's objectives for the energy system are described at paragraph 2.2.3 to *ensure our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050.*

2.6 EN3 - (National Policy Statement for Renewable Energy Infrastructure- November 2023) (CD7) is also a material consideration, paragraph 2.10.9 states that *solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector.*

Development Plan

2.7 The Development Plan is supportive of and consistent with Government policy in recognising the role of planning in supporting the transition to a low-carbon future.

2.8 Support for Renewable Energy is demonstrated in Chapter 14 (Renewable & Low Carbon Energy) of the East Lindsey Core Strategy (CD5) which sets out how the council will deal with planning applications for renewable energy. Notably within the supporting text to policy SP27 Paragraph 14.1 states- *The Council is keen to encourage the exploitation of a range of renewable energy and low carbon sources that have potential in East Lindsey, including passive and photovoltaic solar, biomass, wind power, anaerobic digestion, ground and air source heating and aquifer thermal energy where this will not impact adversely on local communities, biodiversity, heritage assets or landscape character and appearance.*

2.9 Whilst support is given, Chapter 14 is clear that there are sensitivities that must be considered in the site selection process and ultimately the location of renewable energy developments and the council's preference for large renewable energy development is within or alongside existing settlements.

2.10 Paragraph 14.4 states that- *Whilst the sensitivity of special landscapes may prevent large scale renewable energy projects, the Council will encourage the development of local, small scale5 and micro energy solutions.* Furthermore Paragraph 14.5 states- *large scale development that does not*

have these special locational requirements should be located within or alongside centres of population to minimise the effects of distribution and its impact on the landscape.

2.11 The importance of setting in locational considerations of renewable energy schemes is emphasised in supporting text which states at paragraph 14.6 that *the unique local character of the district is made up of many elements, including its landscape, biodiversity, historic assets and other features of cultural importance. This includes not only the site or feature itself, but also its setting.* These principles and sensitivities are then given in effect in policy SP27.

2.12 Core Strategy Policy 27 is informed by the recognition that renewable energy is very important and there are a number of benefits attributed to renewable energy schemes, however, what Policy 27 requires decision makers to do is to consider the cumulative impacts and recognise certain features such as heritage and landscape that are of particular sensitivity when considering renewable energy applications.

2.13 East Lindsey council is a local authority that genuinely adopts a positive approach to support the obligations under the framework for renewable energy and has policies designed to deal with these types of applications. In fact, East Lindsey council has granted a large number of renewable energy schemes over the last 15 years and has made a significant contribution to the renewable energy sector (See Appendix 1). Twenty solar farms of minimum 400kw capacity have been granted consent within East Lindsey since 2010 with a generating capacity of 50.3MW. When this is added to the other forms of renewable energy such as wind turbines (Thirteen sites) and Anaerobic Digesters (12 sites) approved it is clear to see that East Lindsey council has taken a very positive approach to embrace and deliver renewable energy schemes where appropriately sited. This helps to demonstrate that the decision taken in respect of this scheme has not been taken likely.

Reason for Refusal

2.14 The way that the Appeal has arisen has been described in Paragraphs 2.1 to 2.5 of the Council's Appeal Statement (CD8). In summary, it was made on the basis of the planning committee decision on 3rd October 2024 whereby the committee moved to refuse planning permission.

2.15 The decision notice containing the single reason for refusal is set out in full in the Council's Statement of Case (CD8). The refusal identifies harm to the setting and significance of Sturton Harden Corner Farmhouse (Grade II Listed), adverse impacts upon the landscape that detract from the defining rural character of the site and immediate area and the cumulative impact of these harms.

Amended Plans

2.16 The Appellants have prepared an amended site layout plan, with a reduced number (7x rows) of solar panels within the field to the north of the Sturton Harden Corner Farmhouse. The amended plan shows an area of landscaping where the rows of solar panels are removed. Whilst it is unclear at this stage whether the Inspector will accept the revised plans, for completeness, I will analyse whether there is any difference to the harm caused by the original submission and the revised plans within the Planning Balance (section) of this proof. I will analyse whether there is any difference to the harm caused by the original submission within the Planning Balance of this proof.

3. HERITAGE

3.1 The council's detailed evidence on harm to the heritage asset is provided by Emilie Wales and I rely upon Emilie's evidence and importantly upon this advice for the paragraph 215 test within the NPPF.

Legislation

3.2 The following legislation and planning policies are relevant to the planning appeal:

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act, 1990) which provides a statutory requirement for Local Planning Authorities in determining applications involving listed buildings to have *special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses*.

National Policy

3.3 Paragraph 202 of the NPPF (CD7) requires heritage assets to be *conserved in a manner appropriate to their significance as they are an irreplaceable resource*.

3.4 Paragraph 212 requires Local Planning Authority to give "*great weight*" to the conservation of designated heritage assets and importantly that harm is harm "*irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm*".

3.5 Paragraph 213 confirms that substantial harm to a designated heritage asset can be caused "*from development within its setting*".

3.6 Paragraphs 207, 208, 213 and 219 of the NPPF demonstrate that the significance of a heritage asset is not necessarily derived from the asset itself but from setting

3.7 Given the appellants agree with the Council that the level of harm is Less than Substantial the test within Paragraph 215 of the NPPF is relevant which requires *this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*. This is undertaken within the Planning Balance section of this Proof of Evidence.

Local Policy

3.8 Turning to the relevant policies of the development plan (CD5), Policy SP11- Historic Environment, states that proposals will be supported where they amongst other things, preserve or enhance heritage assets and their setting; and have regard to the special architectural or historic interest and setting of the District's Listed Buildings. Additionally, proposals will be expected to demonstrate that they are compatible with the significance of a listed building including fabric, form, setting and use; and notably do not have a harmful cumulative impact on heritage assets.

3.9 Policy SP11 forms the pure heritage local policy consideration when assessing proposals that may impact upon the significance of heritage assets and states that proposals will be supported where they amongst other things, *preserve or enhance heritage assets and their setting*; and have regard to the special architectural or historic interest and setting of the District's Listed Buildings. Additionally, proposals will be expected to *demonstrate that they are compatible with the significance of a listed building including fabric, form, setting and use*; and notably do not have a harmful cumulative impact on heritage assets.

3.10 It is agreed by the Main Parties that the setting of Sturton Harden Corner Farmhouse will be harmed by the appeal proposal and that this gives rise to a harm to its significance due to the proximity of the solar farm to the heritage asset.

3.11 The cumulative impacts of the appeal proposals including heritage harm are also required to be assessed under Policy SP27 - Renewable and Low Carbon Energy - and this will be considered within the overall planning balance. Policy SP27 provides support for large-scale renewable energy development where their individual or cumulative impact is considered to be acceptable in relation to criteria a)-g) when weighed against the benefits. I rely on evidence provided by Emilie Wales regarding non-compliance with criteria c) heritage assets. Harm to the landscape, under criteria b) is identified within the LVIA and referred to in section 4 of this PoE.

3.12 It is agreed by the council and appellant that the development will cause harm to the setting of Grade II listed Sturton Harden Corner Farmhouse. It is also agreed that this level of harm is less than substantial, and Emilie Wales specifies in her Proof that the level of harm sits towards the upper end of the scale of less than substantial harm.

3.13 I am mindful that where a development proposal will lead to less than substantial harm to the

significance of a designated heritage asset, Paragraph 215 of the Framework (CD7) requires this harm to be weighed against the public benefits of the proposal, referred to as the Paragraph 215 Test which I have included within the Balance of Considerations (Section 5) of this POE.

4. LANDSCAPE

4.1 The council is not providing any detailed evidence on harm to the landscape, and I rely on the evidence provided within the LVIA which has been agreed. The following national and local policies were included within the Decision Notice and are relevant to the determination of this planning appeal:

National

4.2 Paragraph 187 of the NPPF (2024) (180 of NPPF 2023) (CD7), requires planning decisions to *contribute and enhance the natural and local environment* through criteria a)- f) that amongst other matters “*recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services*”.

Local

4.3 Core Strategy Policy SP23 Landscape (CD5) is the Council’s pure landscape policy which specifies that *The District’s landscapes will be protected, enhanced, used and managed to provide an attractive and healthy working and living environment. Development will be guided by the district’s Landscape Character Assessment and landscapes defined as highly sensitive will be afforded the greatest protection.*

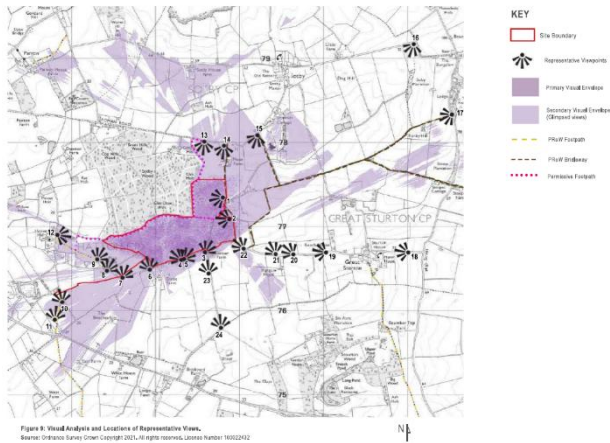
4.4 Additionally, “*the Council will ensure that the distinctive character of the district’s landscapes whether they are of cultural, natural or historic significance, will not be compromised*”. Policy SP23 forms the council’s primary local policy consideration when assessing the impact of a development upon the landscape.

4.5 Landscape and visual impacts are required to be considered as cumulative impacts under Policy SP27- Renewable and Low Carbon Energy (CD5) -and this will be considered within the overall planning balance.

4.6 This policy provides support for large-scale renewable and low carbon energy development where their individual or cumulative impact is, when weighed against the benefits, considered to be acceptable in relation to amongst other matters: b) *surrounding landscape, townscape and historic landscape character, and visual qualities.*

4.7 The appellants Statement of Case at 11.2.2, states “ The reason for refusal can be summarised as a less than substantial harm on the significance of Sturton Harden Corner Farm House which is a Grade II listed building, together with Sturton Harden farmstead buildings which are considered curtilage to the main farmhouse.”,, however, this is not an accurate summary of the reason for refusal as it does not include the harm to the landscape that has been agreed within the LVIA (CD2)

4.8 The LVIA dated December 2021 (CD2) provides a series of viewpoints at paragraph 6.3.1 to demonstrate the visual amenity and the change likely to be experienced.



The LVIA then provides a summary of visual effects at

Table 3 - Summary of Visual Effects at section 6

Table 3 - Summary of Visual Effects

Viewpoint	Distance of View	Significance of Effect Post Completion 15 Years
1	Near	Major Adverse
2	Near	Moderate Adverse
3	Near	Negligible
4	Near	Minor Adverse
5	Near	Minor Adverse
6	Near	Negligible
7	Near	Negligible
8	Near	Negligible
9	Near	Minor Adverse
10	Near	Minor Adverse
11	Near	Moderate Adverse
12	Middle	Negligible
13	Near	Negligible
14	Near	None
15	Middle	Negligible
16	Long	None
17	Long	None
18	Long	None
19	Long	Negligible
20	Middle	Negligible
21	Middle	Negligible
22	Near	Negligible
23	Near	None
24	Middle	None

4.9 In light of this evidence, I consider that the proposal fails to *protect and enhance* the districts landscapes as required under part 1) and in my view, the proposal compromises *the distinctive character of the Districts landscape* and therefore does not comply with part 3) of policy SP23. These harms are also required to be considered as cumulative impacts under policy SP27 criteria b). I attach significant negative weight to the impact upon landscape character & visual receptors, which must be weighed within the overall planning balance.

4.10 The site falls within the Wragby to Horsington Woodland and Farmland (E1) of the East Lindsey District Landscape Character Assessment (ELDLCA) (July 2009) (CD6) which is located to the west of the district (Map page 24).

4.11 The Landscape character description on page 44 of the ELDLCA includes

This fluted and rolling valeside slopes gradually from the Wolds in the east down towards the fens in the west. The landscape has some enclosure due to the landform, frequent small woodlands, and lines of mature hedgerows with hedgerow trees.

4.12 The overall landscape character sensitivity of Wragby to Horsington Vale Woodland and Farmland is described as moderate to high (ELDLCA page 48).

4.13 Viewpoints 1, 2 and 11 (Table 3) demonstrates that visual receptors (people) will experience adverse impacts. The experience of views is not fixed but is transient and so those viewpoints are representative, but the experience is a longer one when walking through the area.

5. THE BALANCE OF CONSIDERATIONS

5.1 The proposed development would not comply with the requirements of Local Plan policies SP11, SP23 and SP27 (CD5) and I have provided justification for the harm to each of these local policies. My view is that the proposal is not in accordance with the Development Plan. The proposed development should therefore be refused unless there are material considerations which indicate otherwise. The NPPF (CD7) is a material consideration in planning decisions as stated in Paragraph 2.

Benefits

5.2 I have considered the planning benefits of the scheme that were agreed within the Common Ground Ref 28 (Page 27) of the Statement of Common Ground (SOCG) (CD8). Under paragraph 215 of the NPPF public benefits are required to be weighed against the less than substantial harm to designated heritage assets. The PPG at Paragraph: 020 Reference ID: 18a-020-20190723" explains that *"...public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit."*

5.3 Therefore, in my view the benefits of the proposed scheme that can be considered to be public benefits are limited to the following:

- Mitigation of climate change and generation of renewable energy carries very substantial weight.
- Secure grid connection and can begin exporting renewable energy to the grid as soon as construction is complete carries significant weight.
- Ecological enhancements and very high BNG carries substantial weight.
- Recreational amenity carries moderate weight.
- Economic benefits from farm diversification and contribution to jobs and the economy carries moderate weight.
- Landscape enhancements from new and managed hedges carries moderate weight.

5.4 The remaining benefits listed below within Common Ground (SOCG) are not public benefits because they are not in my opinion benefits.

- Temporary change in use of best and most versatile land carry neutral weight.

- Transport and access carry neutral weight.
- Amenity, including noise and glint and glare on nearby properties carries neutral weight.

5.5 I will comment further within the Overall Balance of Considerations on whether the benefits exceed the weight afforded to the cumulative harm to both the setting of Grade II listed Sturton Harden Corner Farmhouse and the landscape.

Heritage

5.7 The statutory requirement for Local Planning Authorities and Policies within the Framework and the Development Plan sets a strong presumption in favour of protecting, conserving and where possible enhancing the significance of designated heritage assets. As set out in Emilie Wales's proof of evidence, case law confirms that great weight should be attached to any harm to the significance of a listed building. All levels of harm should be avoided. I have relied upon Emilie Wales's evidence that demonstrates why the proposal fails to meet the requirements of national and local policies that aim to protect their significance of heritage assets.

5.8 Harm to significance of Grade II listed Sturton Harden Corner Farmhouse will result from the development, this harm is agreed to be Less Than Substantial, and therefore Paragraph 215 is engaged. I have identified the public benefits of the scheme and the weight I attach to them in paragraph 5.3, and I rely on Emilie Wales's evidence that identifies the level of harm sits towards the upper end of the scale of less than substantial harm. In my view because of that the Paragraph 215 test is not passed due to the 'great weight' that should be attached to the harm to the significance of the listed building as per para 212 of the NPPF and the level of protection afforded to the setting of listed buildings as a statutory requirement.

5.9 I rely on Emilie Wales's evidence that identifies the level of harm sits towards the upper end of the scale of less than substantial harm but if the inspector considers the level of harm to the significance of the heritage asset is not high but is medium, then in my view, it will also mean that the Paragraph 215 test is not passed. The identified harm to the heritage asset therefore forms a reason for refusal of this development. Furthermore, heritage considerations need to also be considered within the Overall Planning Balance and cumulative impact assessment which is required under Policy SP27.

Lifetime of Development

5.10 The applicants planning application seeks planning permission for an operational lifetime of 40 years. Whilst it is acknowledged that the site will eventually return to its predevelopment condition, the harm identified would exist for 40 years which is comparable to two generations and the harm

caused would not be rendered significantly more acceptable by the prospect of the proposal being removed. I therefore attach neutral weight to this issue.

Policy SP27

5.11 In my view the appeal proposal fails to comply with Core Strategy policy SP27 which requires consideration of the cumulative impacts of renewable energy schemes and recognise certain features such as heritage and landscape that are of particular sensitivity. From the criteria specified as a)-g) the proposal fails to comply with criteria c) in relation to heritage matters and I rely upon Emily Wales's on these matters. Additionally, the proposal also fails to comply with criteria b) in relation to landscape character and I rely on the LVIA in respect of the landscape and visual impacts of the scheme. I consider that cumulatively these harms result in a failure to comply with policy SP27.

Overall Planning Balance

5.12 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF is one such material consideration of significant weight in this respect.

5.13 The proposed development would not comply with the requirements of the Core Strategy policies most relevant policies to the proposal, specifically policies SP11, SP23 and SP27, and in my view the proposed development would not comply with the Development Plan taken as whole. The proposed development should therefore be refused unless there are material considerations which indicate otherwise.

5.14 I have identified the benefits arising from the development in my evidence and have taken them into account as material considerations and applied weight to each matter.

- Mitigation of climate change and generation of renewable energy. I agree with the appellants that this carries very substantial weight.
- Secure grid connection which I agree carries significant weight given its benefits to National Energy Security.
- Ecological enhancements and very high BNG carries substantial weight.
- Economic benefits from farm diversification and contribution to jobs and the economic carry moderate weight.
- Landscape enhancements from new and managed hedges carries moderate weight.
- Recreational amenity carries neutral weight.
- Temporary change in use of best and most versatile land carry neutral weight.

- Transport and access carry neutral weight.
- Amenity, including noise and glint and glare on nearby properties carries neutral weight.

5.15 In my professional opinion it follows therefore that when the cumulative harm to landscape character and visual impact is added on top of the middle level or higher level of less than substantial harm to the heritage asset, the cumulative harm is sufficient enough to result in the refusal of planning permission.

The Amended Scheme

5.16 As explained by Emilie Wales, this amendment does not reduce the harm to the significance of the listed building and so the paragraph 215 NPPF test is not passed for the same reasons as set out above.

6. CONCLUSION

6.1 Overall, therefore, I conclude that the benefits of development are significantly and demonstrably outweighed by the adverse impacts that arise. I do not find that the benefits that arise from the development would justify a departure from the Local Plan and particularly the requirements of policies SP11, SP23 and SP27 (CD5).

6.2 The harm identified cannot be made acceptable and in view of the above, I conclude that the appeal should be dismissed.

Appendix 1

SOLAR “FARMS” IN EAST LINDSEY- granted as of May 2025

1. N/036/01536/10 – Conisholme Fen – approved 12 November 2010 – 1 MW
2. N/119/01502/11 – Mavis Enderby – Approved 17 October 2011 – 430 kW
3. N/019/01902/11 – Little Grimsby – approved 29 November 2011 – 1 MW
4. N/110/02095/11 – Trusthorpe – approved 17 January 2012 – 1.08 MW
5. S/039/00984/12 – Croft – approved 18 October 2012 – 10 MW
6. S/039/01716/13 – Croft – approved 4 December 2013 – 1.23 MW
7. S/020/02242/13 – Irby in the Marsh – Approved 16 October 2014 - 11.44 MW
8. N/218/0928/14 – Yarburgh – approved 16 October 2014 - 8 MW
9. S/023/01092/14 - Skegness – approved 10 December 2014 - 6.5 MW
10. S/094/01115/14 – Kirkby on Bain – 30 September 2014 - 9.4 MW
11. S/039/01432/14 – Croft – approved 29 May 2015 - 500 kW
12. N/161/01563/14 – South Reston –approved 10 December 2014 – 6.5 MW
13. S/054/02433/14 – Frithville – approved 26 March 2015 – 5 MW
14. N/163/00245/15 - Driby Top –approved 31 March 2015 – 1.5 MW + 250 kW
15. S/208/01064/15 – Habertoft –3 September 2015– 10.39 MW
16. S/203/01106/15 – Stickney – 17 September 2015 – 5 MW
17. N/036/02486/15 – Conisholme Fen – approved 2 March 2016 – 5 MW
18. S/051/00772/17 – Irby in the Marsh – approved 30 Nov 2017 – 15.47 MW
19. S/152/01297/22 – Sibsey – approved 19 December 2022 – 10MW
20. N/036/00565/24 – Conisholme Fen – approved 2 August 2024 – 14 MW plus battery storage.

*NB – only those “farms” over 400 kW included.

Appendix 2

Summary

1.0 Witness Information & Scope of Evidence

My name is David Wordsworth, I hold a Degree in Town and Country Planning and a post-graduate diploma in Town Planning I am a Chartered Member of the Royal Town Planning Institute, now working as a Freelance Planner with 26 years' experience of working within Development Management. I will provide evidence on the weight to be applied to the harms to policies within the Development Plan and the NPPF (The Framework) (CD7) within the Planning Balance.

2.0 Introduction, Appeal Proposals & Reason for Refusal

The appeal proposal (as described in section 3 of the SoCG) seeks full planning permission for the installation and operation of a ground mounted solar farm of around 49.9MW that would generate and deliver electrical power to the local distribution network. The site is located on approximately 180 acres of agricultural land spread over 5x parcels of land. The site is gently undulating and lies approximately 4km to the west of the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB).

There is a body of evidence that demonstrates the importance and significance of renewable energy and the role that the planning system plays in its delivery. The refusal identifies cumulative impacts caused by harm upon the setting and significance of Sturton Harden Corner Farmhouse (Grade II Listed), and adverse impacts upon the landscape that detract from the defining rural character of the site and immediate area.

The Development Plan is supportive in principle with Government policy emphasises upon the role of planning in supporting the transition to a low-carbon future. Whilst support is given, Chapter 14 of the Core Strategy is clear that there are sensitivities that must be considered in the site selection process and ultimately the location of renewable energy developments and the council's preference for large renewable energy development is within or alongside existing settlements.

East Lindsey council has granted a large number of renewable energy schemes over the last 15 years and has had a significant contribution to the renewable energy in the region.

3.0 Heritage

I rely upon Emilie Wales's evidence and importantly upon this advice for the paragraph 215 test within the NPPF. Harm to setting of Grade II listed Sturton Harden Corner Farmhouse will result from the development and this harm is agreed by the appellants and the Council to be Less Than Substantial. Paragraph 215 of the Framework (CD7) requires this level of harm to be weighed against the public benefits of the proposal.

4.0 Landscape

The council is not providing any detailed evidence on harm to the landscape however, I rely on the evidence provided and agreed within the LVIA. Policy SP23 is the Council's pure landscape policy, and I consider the proposal fails to *protect and enhance* the districts landscapes as required under part 1) and in my view, the proposal compromises *the distinctive character of the Districts landscape* and therefore does not comply with part 3) and therefore does not comply with policy SP23. The proposal also fails to comply with policy SP27 through noncompliance with criteria b).

5.0 Balance of Considerations

I have identified the benefits arising from the development in my evidence and have taken them into account as material considerations and applied weight to each matter. In most cases I agree with the apportionment of weight to such benefits, In my professional opinion when the cumulative harm to landscape character and visual impact is added on top of the middle level or higher level of less than substantial harm, the cumulative harm is sufficient to result in the refusal of planning permission.

6.0 Conclusions

The benefits of development are significantly and demonstrably outweighed by the adverse impacts that arise. I conclude that the appeal should be dismissed.

