PAP/2023/0071

Fillongley Solar Farm

Planning Statement

Including Statement of Community Involvement

Enviromena Project Management UK Ltd

February 2023

NORTH WARWICKSHIRE
BOROUGH COUNCIL
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PLANNING & DEVELOPMENT
DIVISION

Fillongley Solar Farm

Planning Statement including Statement of Community Involvement

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- consultation feedback form
- Consultation website www.fillongleysolarfarm.co.uk

1.0 INTRODUCTION

Background

1.1 This Planning Statement has been prepared by Barton Willmore now Stantec on behalf of Enviromena Project Management UK Ltd (the 'Applicant') to accompany a full planning application to North Warwickshire Council ('the Council'), for a proposed solar photovoltaic (PV) farm on land east of Meriden Road, Fillongley (the 'Site').

1.2 Planning consent is sought for the following proposed development:

> **"Construction of a temporary Solar Farm providing 45.9MW output, to include the installation of ground-mounted solar panels together with associated works, equipment and necessary infrastructure."**

1.3 The Development comprises the construction, operation, management and decommissioning of a grid-connected solar farm with associated infrastructure to provide a reliable source of clean, renewable energy to the National Grid.

1.4 The Statement sets out the planning policy context relating to the planning merits and acceptability of the principle of the Development and how environmental issues relating to the development are addressed. This Statement should be read in conjunction with the drawings and information accompanying the planning application to fully understand the Development, its potential impacts and planning merits.

Application Submission Details

1.5 Table 1.1 below sets out the plans and documents that are submitted with the applications.

Table 1.1: Application Submission Documentation

Document	Consultant
Drawings	
Site Location	Enviromena
General Site Layout	Enviromena
Building Plans and Elevations	Enviromena
Reports	
Application Form	Barton Willmore
Planning Statement including Statement of Community Involvement	Barton Willmore
Design and Access Statement	Barton Willmore
Landscape and Visual Impact Assessment	FPCR
Archaeology Summary Statement	BWB
Flood Risk Assessment	BWB
Tree Survey and Arboricultural Impact Assessment	Iain Tavendale
Agricultural Land Report	Roberts Environmental
Preliminary Ecological Appraisal	ArbTech
Glint and Glare Assessment	Pager Power
Transport Statement	Motion

Environmental Impact Assessment

1.6 A request for a Screening Opinion under Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 was submitted to North Warwickshire Council on 22 December 2022.

1.7 North Warwickshire Council issued their Screening Response on 3 January 2023, which determined that the Development did not constitute EIA Development. Considered against the indicative threshold set in Schedule 2 (3)(a) of the EIA Regulations the Development would not be likely to have significant effects on the environment by virtue of factors such as its nature, size, location, and cumulative impact.

Background Context

1.8 The UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050. This requires major investment in proven technologies, such as solar, which are supported by planning policy at local and national level.

1.9 The move to carbon neutrality is considered important at a global scale, as such the European Commission is proposing to turn the European Green Deal into law, which would see the EU committed to being climate neutral by 2050 in their strive to be the first climate-neutral continent. While this would not directly apply to UK policy, it is important context demonstrating the importance being put on renewables at a global scale. In April 2021, the Government announced an accelerated target to reduce greenhouse gas emissions by 78% of 1990 levels by 2035.

1.10 Warwickshire County Council, including all sub districts, declared a Climate Emergency in 2019. This declaration represents a commitment to make the councils activities carbon neutral by 2030.

1.11 Enviromena is a clean energy solutions company providing safe, affordable, and reliable solutions for growing sustainable power demands. Headquartered in the UK, Enviromena has more than 15 years' global experience in developing, designing, constructing, managing, and operating ground-breaking renewable energy projects.

1.12 Enviromena currently manages, operates, and maintains over 700 megawatts (MW) of renewable energy assets including wind, solar, and energy storage projects. Pipeline projects will see this shortly rise to a 1.7 GW generating potential, offsetting the equivalent of almost 1.6 million metric tons of carbon emissions annually.

1.13 Enviromena is committed to ensuring that they leave the communities and places that they touch in better condition than when they arrived. They a prioritise safe working conditions, care for the environment, respect for their employees and the communities

they touch. They take their responsibility to operate sustainably very seriously because not only because this makes sound commercial sense; it is also a matter of delivering on duty of care for future generations.

1.14 Enviromena are a trusted renewable energy partner with a strong track record of delivering and maintaining renewable energy projects. It is committed to making a positive and significant impact on the causes of climate change and to achieving biodiversity net gain and environmental improvements.

Structure of this Statement

1.15 The remainder of this statement comprises the following chapters:

- Section 2.0 provides a description of the Site, its surroundings and any relevant planning history of the Site;
- Section 3.0 describes the proposed development;
- Section 4.0 sets out the need for renewable energy and the sustainability implications of the development;
- Section 5.0 sets out the approach to engagement through Statement of Community Involvement;
- Section 6.0 sets out the relevant national, regional and local planning policies and guidance relevant to the Site and the Development;
- Section 7.0 considers the main planning issues and provides an assessment of how the application complies with planning policy; and
- Section 8.0 summarises the Planning Statement and draws conclusions.

2.0 THE SITE

Site Location

2.1 The Site is situated approximately 9km north-west of Coventry City Centre and circa 600m south-west of the village of Fillongley. It lies wholly within the administrative boundary of North Warwickshire Council as the Local Planning Authority.

Site Description

2.2 The Site extends to 61 hectares (150 acres) and is currently in agricultural use, consisting of several agricultural fields with trees and hedgerows present. A watercourse, Bourne Brook, traverses the north-western boundary with drainage ditches located in the north west area. A second unnamed watercourse runs from the southern boundary to the south eastern boundary.

Figure 2.1 Application Site

2.3 The site is set within an open countryside setting bound to the north, east and west by agricultural land and the M6 south with further agricultural land beyond. Within the wider open countryside around the Site are isolated homes, commercial premises, and farmsteads.

2.4 The main vehicular access to the Site is from field accesses from the B4102 Meriden Road at the Site's western boundary.

2.5 The Site is predominantly located in Flood Zone 1 (low risk) as indicated by the Environmental Agency's indicative flood mapping system, however there are some areas of heightened localised flood risk associated with the watercourse and drainage ditches present at the north west of the Site.

2.6 The Site is not covered by any statutory heritage designations nor are there any listed structures within its boundaries. There are, however, numerous listed structures (Grade II* and II) within a 1.5km radius and the scheduled ancient monument Ringwork Castle, is situated approximately 500m northeast of the Site.

2.7 The Site is not covered by any ecological designations nor are there any within 2km.

2.8 A Public Right of Way (PRoW) runs north-south across the Site and is situated on the western extent following the first field boundary in from the western most boundary.

2.9 The Site lies wholly within the Green Belt.

2.10 The Site consists of agricultural land which is identified as comprising of Grade 3a (71%) Grade 2 (24%) and Grade 3b (3%) value by the Agricultural Land Classification (ALC) Report submitted as part of the application package. As such the Site comprises predominantly of Best and Most Versatile (BMV) farmland.

3.0 PLANNING HISTORY

Planning Applications on the Site

3.1 Reflecting the Site's agricultural use, a search of the Council's online planning records, revealed no recent or relevant planning history within the Site's boundaries.

Planning Applications close to the Site

3.2 We note that planning permission was recently granted (July 2022) by North Warwickshire District Council for the following solar farm schemes which are also located within the Green Belt:

- Reference: PAP/2021/0651, Land North of Park Lane Farm, Park Lane, Astley
- Reference: PAP/2021/0605 – Land at Smorrall Lane, Astley

3.3 For both applications it was determined that the benefits of the schemes, outweighed the (temporary) harm to the Green Belt. It was recognised that solar farms may result in some landscape and visual harmful impacts, as well as being inappropriate development in the Green Belt. However, national, and local planning policy adopt a positive approach indicating that development can be approved in very special circumstances and those circumstances can include the benefits arising from renewable energy generation. Here, through a combination of topography, existing screening and landscape mitigation, the adverse effects on the openness of the Green Belt, landscape harm and visual impact would be localised and thus limited. Moreover, as the proposed landscape mitigation planting progressively matures, there would be a reduction in these residual adverse impacts. Additionally, the bio-diversity gains were considered to bring significant benefit.

3.4 With respect of application PAP/2021/0605 – Land at Smorrall Lane, the Planning Committee Board Report (June 2022) concludes (*Paragraph 4*.40 -4.43) that:

> **"Whilst there would be some localised harm, greater weight is attached to the overall societal and national benefit arising from the need to tackle climate change through support of renewable energy generation and its sustainable supply…**
>
> **The proposal would make a contribution to the objective of achieving an increase in renewable energy generation and ensure that this is a sustainable increase with some other benefits. When national and local plan policy is taken together as a whole, the proposal would not conflict with their objectives.".**

3.5 As demonstrated further within this Statement, it is considered that given the Site's physical location, existing and proposed landscape mitigation there is no reason why the same decision cannot be reached in respect of the Development subject to this planning application.

3.6 It is however acknowledged that the consented schemes PAP/2021/0651 and PAP/2021/0605 are in the same area of the Borough as the current Site, and thus the possibility of cumulative impacts will be a material planning consideration.

3.7 In this regard it is highlighted that the permitted schemes lie approximately 4km north and east of the Site respectively, therefore due to the physical distance, intervening-built form and infrastructure and existing landscape features there is no visual intervisibility between the sites. Furthermore, there are no direct highway or footpath network connections or nature conservation linkages. In landscape terms they are each within different settings and with no overlapping impacts.

3.8 Given that all three sites are in the Green Belt it is acknowledged that there would be some loss of openness, and resultant encroachment into the countryside. However, due to separation distances, the lack of intervisibility and the extensive area of open countryside in which they are located the cumulative harm would be very limited.

Planning Applications of Relevance Elsewhere

3.9 For completeness it is also pertinent to highlight examples of planning permissions granted for ground mounted solar farms in the Green Belt in other local authority areas.

3.10 These include:

- Planning Application Ref. 19/01046/F. Cherwell District Council. Approved October 2019.
- Planning Application Ref. 15/00525/FUL Broxtowe Borough Council. Approved January 2016.
- Planning Application Ref.13/00543/FUL Thurrock Borough Council. Approved November 2013.

3.11 These decisions were also made on the basis of a balancing exercise of weighing the harm to the Green Belt, as well as other identified harm, against the benefits of the schemes.

3.12 This approach has been repeated in several other applications and appeal decisions for solar farms located in the Green Belt throughout the country.

3.13 Of relevance is Planning Appeal Ref. APP/C1950/W/19/3225810 in Hertfordshire in which the Inspector stated:

- The harm to the character and appearance is outweighed by the fact that it is a temporary and reversible development;

- The scheme would make a valuable contribution to cutting greenhouse gas emissions which provides wider environmental benefits through the increased production of energy from renewable resources; and
- The location of the array together with the proposed landscaping, results in the location where the impacts can be made acceptable.

3.14 The appeal concluded that "*the environmental benefits of the proposal and the fact that the impacts can be made acceptable, are sufficient to outweigh the harm to the Green Belt. Consequently, the very special circumstances necessary to justify the proposal do exist*"

Planning History Summary

3.15 In summary, the generation of renewable energy is a well-established and nationally accepted Very Special Circumstance to support the granting of planning permission for development in the Green Belt. In this regard the temporary and reversable nature of solar farms and the biodiversity gains are key considerations in the acceptability of any scheme.

3.16 Two solar farm schemes have recently been consented in North Warwickshire also in the Green Belt where it was determined that the pressing need for increased renewable energy generation more than outweighed the limited landscape visual harm. It is demonstrated in subsequent sections of this Statement that the same conclusion should be reached in respect of the Development.

3.17 It is also reiterated that each planning application is required to be determined on its own merits. Nevertheless, cumulative impacts will need to be considered and in this we highlight the physical distance, lack of intervisibility between the three solar schemes and extent of open countryside will result in very limited cumulative harm.

4.0 THE PROPOSED DEVELOPMENT

4.1 The Applicant is proposing to develop a Solar Farm on land at Fillongley.

4.2 A detailed suite of drawings accompanies this submission as per Table 1.1 and a full description of the elements of the Development is provided within the accompanying Design and Access Statement (DAS).

4.3 A summary of the key elements of the Development is as follows.

Solar Farm Infrastructure Components

4.4 The Development comprises of ground-mounted solar photovoltaic arrays together with ancillary infrastructure and landscaping and biodiversity enhancements. The solar farm will have an export capacity of up to 45.9MW of electricity at peak operation and is proposed for a period of 40 years.

4.5 To achieve maximum solar gain the panels are laid out in east-west rows with space of at least 5.5 metres between each row to prevent overshadowing. The fixed modules will be tilted at a site-specific angle of 25 degrees based upon the topography and latitude of the Site and mounted facing due south. The arrays are finished with non-reflective material to ensure that there is no glare.

4.6 The panels will be supported by associated infrastructure including:

- Inverters: these convert the Direct Current (DC) electricity collected to the Alternating Current (AC) used in electricity distribution / transmission.
- Transformers: these control the voltage of the electricity generated.
- Switchgear: a combination of electrical disconnect switches, fuses or circuit breakers used to control, protect, and isolate electrical equipment.

4.7 The site will be protected by CCTV security systems with cameras situated within the site boundaries.

4.8 For security purposes there will be a requirement to enclose the solar panels, however, given the rural context, it is proposed to install deer fencing, which comprises of timber posts and wire meshing. Such fencing is designed to ensure most wildlife can continue to travel through and use the site.

4.9 There will be no lighting within the site during its operational period.

Landscape and Biodiversity Proposals

4.10 The solar arrays will be wholly located within the existing field enclosures, this has enabled the maximised retention of existing boundary trees and hedgerows. The landscape strategy therefore seeks to maintain the existing boundary vegetation and enhance provision through additional planting of trees, hedges, and shrubs. Including significant 'gapping-up' of existing hedgerow along the southern boundary with the M6. The species planting mix will be finalised in conjunction with project ecologist to ensure ecological benefits are maximised. This will ensure the Site continues to assimilate with the surrounding landscape character and filter views of the Development. Additional tree, and hedge planting is proposed along the extent of the PRoW which traverses the Site to minimise impacts on users and maintain overall a 'green' aspect.

4.11 The existing watercourses and drainage ditches present on the Site will be maintained and an easement has been achieved to minimise disruption of these features.

4.12 Across the main body of the Site, diverse meadow grassland mix will be sown under and around the arrays which will be subject to an appropriate maintenance regime to ensure complete green groundcover. In addition, where appropriate, bat and bird boxes will be provided.

4.13 Overall, the landscape and ecology strategies proposed will ensure the Site assimilates with its surroundings and provides net gains for biodiversity.

Construction Period

4.14 It is envisaged that a Construction Environmental Management Plan (CEMP) would be provided as a Pre-Commencement Condition of any planning consent.

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

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

4.16 Construction and operational phase vehicles will access and egress the Site via an existing access to B4102 Meriden Road at the Site's southwest corner. All traffic associated with the construction phase will utilise this access and be able to enter and exit in forward gear. If ground conditions dictate, wheel washing facilities will be provided to ensure no mud or loose material is transferred onto the local highway network by construction vehicles.

4.17 The construction hours will be agreed with the local planning authority through the CEMP, which will be conditional upon approval.

Grid Connection

4.18 The works required to connect the solar farm to the National Grid will be undertaken separately by the DNO utilising its permitted development rights prescribed in Section 17 of the Town and Country Planning (General Permitted Development) Order 1995. The connection into the grid therefore does not form part of the Application. The route will be confirmed by the statutory undertaker nearer the time once the necessary surveys have been undertaken and the optimum route identified.

Operational Period

4.19 Once operational, the Development will be monitored remotely. Occasional maintenance activities will be required for groundskeeping, cleaning of the solar panels, checks on equipment and occasional visits to the substation by the DNO. It is expected that the operational development could require up to two maintenance visits per month in cars or transit van-type vehicles, using the access from Meriden Road.

4.20 It is intended that the Site would be retained in agricultural use for the life of the Development with land between and underneath the panels used for grazing and/or planting a combination of grassland and meadows.

Decommissioning

4.21 At the end of the temporary operational lifespan (40 years) the solar panels and other infrastructure would be removed, and the Site will be fully reinstated and returned to its agricultural use.

4.22 The decommissioning process is intended to ensure that the land is restored to the same quality it was previously and can be secured through a suitable condition in the event planning permission is granted.

5.0 SITE SELECTION PROCESS

5.1 The Applicant has undertaken a robust and effective site selection exercise to identify suitable areas for solar development to meet the electricity demand within this network area. The site selection process that the Applicant has undertaken is outlined below.

Location Requirements for Solar Farms

5.2 Solar farms have very specific locational requirements which means they cannot be located anywhere with suitable locations severely limited around the country.

5.3 Principal requirements are:

- *Grid Connection Capacity* - The DNO must be able to offer a Point of Connection (POC) with capacity to accept the output of the solar park. Finding available capacity is one of the biggest challenges facing renewable energy development.
- *Avoiding Energy loss* - Site must be located close to a POC to avoid transmission losses. The greater the distance, the more energy is lost along the way. Locating a site far from a POC is not an efficient use of land; it means there is less clean energy getting to the grid from the same land use area, which undermines the principles of sustainable development.
- *Route to Connection*: There are often technical considerations and land constraints which mean that cable paths cannot be 'as the crow flies'.
- *Land Availability*: Site options are heavily restrained by land availability. A willing landowner is a major challenge facing renewable energy development.
- *Environmental considerations*: A search considers proximity to ecological areas like SSSI, RAMSAR, LNR, Special Areas of Conservation, and Special Protection Areas. Development in such areas is to be avoided.
- *Planning Policy*: Site selection is mindful of national and local planning and environmental policy. This ranges from requirements in the NPPF, Local Plan, and Neighbourhood Plans.
- *Sustainable Development*: All solar farms must be capable of multifunctional enhancements to support the economic, environmental, and social *dimensions* of sustainable development. A good site will be able to incorporate visual mitigation to protect and enhance PROWs, and to enable Biodiversity Net Gain.

5.4 In summary, there are very few sites where solar farms can be located, when factors such as suitable grid connection, viability and feasibility and environmental designations are

considered. Due to the land take required for solar farms, they usually require an open countryside location.

Fillongley Solar Farm Site

5.5 Following the above site selection methodology, the Site was considered a suitable location to accommodate a solar farm. Key considerations highlighted include:

- *Connection* to the national grid – There is sufficient capacity at the existing nearby substation.
- Availability of land – The Site has an interested landowner, who were agreeable in principle to leasing their land for solar.
- Topography – The Site has a gently undulating topography which makes it particularly suitable for solar.
- Accessibility – The Site has good connections to the Strategic Road Network to allow for construction and maintenance operations.
- Planning and environmental considerations – The Site is not subject to any protected landscape, heritage, or ecological designations.

5.6 It is acknowledged that the Site lies within the Green Belt and as such Very Special Circumstances (VSCs) are required to be demonstrated. Renewable energy generation is a well-established VSC in planning, as highlighted in Section 2 and discussed further in Section 7.

5.7 It is also acknowledged that the Site comprises predominantly of Best and Most Versatile (BMV) agricultural land, for which there is a general presumption against development. As set out in Section 7 of this Statement, a solar farm is only a temporary use that does not change the agricultural land classification. They do not result in the loss of agricultural land in perpetuity. On the end of the farms productive life the Site will be decommissioned and remediated and will revert to agricultural use.

6.0 STATEMENT OF COMMUNITY INVOLVEMENT

6.1 This section of the Planning Statement demonstrates how the Applicant has consulted with the local community and key stakeholders regarding the proposed solar farm and outlines how the input received has benefitted the preparation of the development proposals.

6.2 The Applicant understands the importance of engaging with as many stakeholders as possible throughout the pre-application stage.

Public Consultation Strategy

6.3 The public consultation strategy undertaken for the Fillongley Solar Farm scheme comprised of a leaflet drop, development of a project website and a meeting with the local Parish Council. Copies of the consultation leaflet, feedback form and website are provided at Appendix A.

Leaflet Drop and Project Website

6.4 The consultation leaflet included key information on the project including details of Enviromena, the site location and the proposals. The leaflet also included a series of answers to frequently asked questions and recipients were directed towards the project website for further information.

6.5 Included with the leaflet was a feedback form, seeking thoughts on the Development. The feedback form was also accompanied by a prepaid return envelope, or an email address was provided if electronic reply was preferred.

6.6 The leaflets were delivered via first class post to residential properties within the distribution area identified in Figure 5.1. The aim was to ensure that those in proximity and intervisibility were made aware of the proposed scheme. In total, 902 homes received the consultation leaflet between 23/24 January.

Figure 6.1: Consultation leaflet distribution area.

6.7 The project website www.fillongleysolarfarm.co.uk was made live on Friday 20 January.

6.8 The website provided further details of the Site and the development proposals. It also included images of recently completed Enviromena solar farm scheme 'Three Maids' in Winchester to provide further context as to how the Development would look once completed. An electronic version of the feedback form was also available to be completed via the 'have your say' section of the website.

6.9 Residents were encouraged to respond either by post, email or via the online form by Tuesday 31 January. The feedback received has been reviewed and considered in the final application submission.

Responses

6.10 As of 2 February 2023, the Fillongley solar farm project website was viewed 645 times with an average view time of just under 2 minutes.

6.11 In total 154 feedback forms were returned:

- 110 via the project website;
- 37 via post; and
- 8 via email.

6.12 Over 98% of respondents indicated that they were responding to the consultation as a local resident.

6.13 The Feedback form included three tick box questions and provided opportunities for respondents to expand on their answers. Not every respondent answered every question, therefore the numbers may not total.

Q1. Do you support the use of renewable energy?

- Yes: 97
- No: 17
- No opinion: 21

6.14 The feedback form provided space for respondents to expand their answer to provide more context. A review of all forms received has been undertaken to understand commonalities across comment, from this exercise the following key issues and topics (in no particular order) have been identified:

- Concerns over loss of valuable agricultural land – generally respondents felt it was more appropriate for the Site to remain under food production than used for energy generation.
- Concerns over loss of Green Belt land to development
- Brownfield land should be prioritised for renewable energy schemes and existing buildings should be retrofitted with renewable technologies first.
- Concerns over the efficiency of solar technology in the UK
- Queries as to potential benefits for local area
- Concerns that Site will be considered brownfield at end of lifespan and consequently available for further development
- Negative impact on views
- Negative impact on landscape character
- Negative impact on wildlife
- Support for the proposals in tackling climate change and assisting with UK energy security.

Q2. Do you support the Fillongley Solar Farm proposal?

- Support: 48
- Undecided: 5
- Opposed: 73

6.15 The feedback form provided space for respondents to expand their answer to provide more context. A review of all forms received has been undertaken to understand

commonalities across comment, from this exercise the following key issues and topics (in no particular order) have been identified:

- Concerns over loss of valuable agricultural land – generally respondents felt it was more appropriate for the Site to remain under food production than used for energy generation.
- Concerns over loss of Green Belt land to development
- Brownfield land should be prioritised for renewable energy schemes and existing buildings should be retrofitted with renewable technologies first.
- Questions over need in this location given presence of other Solar Farm projects in the area
- Concerns over the efficiency of solar technology in the UK
- Queries as to potential benefits for local area
- Concerns that Site will be considered brownfield at end of lifespan and consequently available for further development
- Negative impact on views
- Negative impact on landscape character
- Negative impact on wildlife
- Negative impact on house values
- Potential health risks
- Support for the proposals in tackling climate change and assisting with UK energy security
- Good site adjacent to M6, well screened with no noise/air quality impacts.

Q3. Any further comments?

6.16 The feedback form then provided space for respondents to provide any additional comments. The responses have been summarised as falling within the following topics/issues:

- Concerns over loss of valuable agricultural land
- Concerns over loss of Green Belt land to development and potential for it to be subsequently available for further development
- Brownfield land should be prioritised for renewable energy schemes and existing buildings should be retrofitted with renewable technologies first.
- Questions over need in this location given presence of other Solar Farm projects in the area
- Concerns over the efficiency of solar technology in the UK
- Queries as to potential benefits for local area
- Concerns over potential hazard on M6 users from glare

- Negative impact on views
- Negative impact on landscape character
- Negative impact on wildlife
- Potential health risks
- Support for the proposals in tackling climate change and assisting with UK energy security
- Good site adjacent to M6, well screened with no noise/air quality impacts
- Impacts on shooting club
- Impacts on PRoW
- How would project connect to Grid

Applicant's Response to Key Issues and Topics

6.17 As demonstrated in response to Q1, residents support the use of renewable energy, however they have questions and concerns over Site specific benefits of the Fillongley Solar Farm scheme.

6.18 The Applicant's response to the key issues and topics identified through the consultation exercise are set out below, with the aim to address and allay concerns.

Loss of agricultural land and impact on UK food security

6.19 The applicant acknowledges that the Site comprises predominantly Best and Most Versatile agricultural land and the Site will not be used for arable food production during the operational period of the scheme However, the Applicant encourages the grazing of sheep in its solar farms, meaning that the potential for dual use of the land for electricity development and agriculture will be explored during the development of this proposal.

6.20 Solar Energy UK is a body for the solar industry providing leading research into solar technology to facilitate the UK's transition to a low carbon economy. Solar Energy UK has recently undertaken research into the relationship between solar farms and food security[1]. Their research found:

- Solar helps address climate change, which is the single biggest threat to UK food security. This is according to the Department for Environment, Food and Rural Affairs, which says that climate change could reduce the UK's stock of high-grade agricultural land by nearly three-quarters by 2050. Because solar

[1] Solar Energy UK (September 2022) Solar Farms and Food Security: The facts. Accessed: https://solarenergyuk.org/wp-content/uploads/2022/09/Briefing-Solar-Farms-Food-Security_The-Facts_Sept2022.pdf

farms generate near zero carbon electricity, they help address climate change. This means they are helping to improve the UK's food security.

- Solar cuts costs, which helps keep UK farmers in business. Solar provides some of the cheapest electricity in history. Without solar, energy prices would be even higher. T Solar can also provide a direct and long-term revenue stream for farmers who choose to host a project on their land.
- Solar preserves agricultural land. Planning permission for a solar farm is time limited, and installations can be completely dismantled at the end of their operation. Solar does not take agricultural land, it borrows it, and because agricultural land under a solar farm is in effect left fallow, soil health can recover.

6.21 Therefore, whilst the Development will temporary place agricultural land out of use it will still help to achieve UK food security by allowing the soil to regain productive health, helping to reduce energy costs, impact of climate change and allowing for mixed farming practices to continue.

Inappropriate Development in the Green Belt

6.22 It is acknowledged that the Site is located within the North Warwickshire green belt, where development is considered inappropriate except where very special circumstances can be demonstrated to outweigh the harm.

6.23 Section 7 of this Statement sets out a detailed discussion of the Very Special Circumstances that exist in relation to the Development, in summary:

- The Development will generate up to 45.9MW of clean renewable energy to the grid, powering the equivalent of 10,900 homes and saving 15,800 tonnes of CO2 per year, making a significant contribution to meeting global, national and local carbon reduction targets;
- The limited landscape and visual impacts, due to the design approach of containing the panels within existing and established boundaries which will be supplemented and strengthened by additional planting to ensure that the scheme will successfully integrate into the landscape at this location;
- The rural location of the Site will not result in merging of settlements, unrestricted urban sprawl and preserve setting of historic towns;
- The temporary and fully reversible nature of the Development;
- The continued agricultural use of the site during the lifespan of the Development; and

- Minimal level of activity generated by the development including very minimal traffic generated.

As such the benefits of the scheme can outweigh and justify the minor and temporary 'harm' to the Green Belt.

Scale and Need of the Development

6.24 The Development will contribute towards the UK's efforts to tackling climate change and achieving Net Zero emissions.

6.25 The Committee on Climate Change (CCC), which advises the Government on achieving Net Zero, is clear that solar power has a vital role to play in reducing greenhouse gas emissions. The CCC says that electricity from renewable sources, including solar, will need to quadruple in order for the UK to achieve carbon neutrality. The CCC states that the UK requires 23-43 gigawatts of solar power by 2030, at present, the UK only has capacity for 13 gigawatts.

6.26 Whilst it is acknowledged that using brownfield land and retrofitting PV cells and wind turbines on buildings will make a positive contribution, the required upscaling of renewable energy production cannot be accommodated on small brownfield sites alone, large sites will be required. Inevitably large sites will be in open less developed locations.

6.27 The proposed Fillongley solar farm will generate approximately 46,000 megawatt hours of clean, renewable energy each year. That is enough electricity to power 15,800 homes each year making a significant contribution to the UK's transition to carbon neutrality and UK energy security.

6.28 In this regard the Applicant also acknowledges comments regarding other solar farm proposals in the Borough. If the UK is to meet its climate change targets, then a significant increase in renewable projects is required. Nevertheless, each scheme is required to ensure that it adheres to local and national policy requirements including ensuring proposals are acceptable with regards to residential amenity and visual impact and deliver biodiversity benefits. Given the physical distances involved there is no visual intervisibility between the projects and no linkages in respect of footpaths, roads or wildlife corridors.

Visual impact

6.29 The Landscape Visual Assessment (LVA) submitted as part of the planning application considers the effects of the Development on both the landscape and visual impact from viewpoints around the Site, including from Public Rights of Way ('PRoW'). It concludes that:

- The Site can accommodate the proposed development without undue effects on landscape character or visual amenity. Visibility of the proposals would be localised as a result of Site's topography and existing trees and hedgerows.
- Mitigation, in the form of substantial planting of new hedgerows and trees, would mitigate the landscape impact

Impact on Wildlife

6.30 The project will have a positive impact on local wildlife. A 'biodiversity net gain' will be delivered, which means the natural environment will be left in a better state than before the Development. This includes additional tree, hedge and shrub planting and the seeding of the site as meadow grassland. Bat and bird boxes will also be provided.

6.31 Deer fencing is proposed around the perimeter of the site to avoid damage to the PV arrays, but smaller animals can continue to access and use the Site. Given the extent of surrounding open space and the network of footpaths it is considered that the fencing will not detrimentally impact on deer.

Community Benefits

6.32 The project will deliver significant benefits for the local community. This includes enhancing local biodiversity, including wildflower planting of the site.

6.33 The Development will also be subject to business rates to be paid to North Warwickshire Council. It is estimated that the Development will generate over £75,000 a year in business rates. The Council will keep a proportion of the business rates collected locally to pay for services they provide, such as:

- street lighting
- improving public spaces
- keeping streets clean and safe

6.34 A proportion will go to central government and some is given to Warwickshire County Council to pay for other services, such as police and fire services.

6.35 In addition, the project will deliver wide-reaching benefits for the environment. The project will meet the electrical needs of approximately 17,100 homes, providing a CO2 displacement of 11,300 tonnes compared to the same energy from fossil fuel sources.

Public Rights of Way

6.36 It is acknowledged that a PRoW traverses the Site. The proposed solar farm development will not divert the PRoW and members of the public will still be able to walk this route even once the proposed site has been constructed.

6.37 Deer fencing will be installed on either side of the PRoW and to help screen views of the project the Applicant plans to incorporate native hedgerows along the fenceline.

Solar Energy Technology in the UK

6.38 Despite its reputation for having grey and cloudy weather, the UK has more than enough sunlight to power solar panels. It actually gets the same amount of solar energy as certain areas in France or Spain, which are meant to have more Mediterranean climate. The UK gets around 60% of the solar radiation found in the Equator.

6.39 Even though solar panels produce more power during a sunny day, they can still produce a considerable amount of energy when the days are cloudy. Solar PV uses light to produce electricity, not heat. Furthermore, given the frequent windy periods which the UK experiences, this can assist in the efficiency of the solar panels and associated components.

6.40 There is no proven evidence to suggest that there are any health implications as a result of solar energy generation. There are however significant benefits related to health as a result of solar generation, most notably the offset of carbon emissions (as highlighted in this Planning Statement).

Fillongley Clay Shooting Club

6.41 The Shooting Club at the site will close prior to construction works commencing. The Applicant understands that the landowner plans to re-open the shooting club at an alternative nearby location soon.

Future Development Potential

6.42 The application seeks to secure temporary planning permission for the use of the Site to accommodate a solar farm. The permission will not change the Site's green belt designation and will not constitute previously developed or brownfield land at the end of the operational period.

Impact on M6

6.43 The application is accompanied by a Glint and Glare Assessment which has identified that due to gaps in existing boundary vegetation there is the potential for some glare on to users of the M6. To adequately mitigate this, additional planting of trees, shrubs and hedgerow is proposed along the southern boundary to close gaps and effectively screen the Site. With this planting in place there is no impact onto the M6.

Impact on Property Value

6.44 Material planning considerations are issues that should be discussed when deciding whether to grant planning permission. Broadly speaking, material planning considerations are determined from the viewpoint that planning is concerned with public interest. As such perceived loss of property value are not considered to be material.

6.45 Property value is subjective and can be affected by a range of factors. There is no firm evidence on whether UK solar farms do or do not affect house prices. Potential impact on local properties in terms of visibility and glint and glare have been assessed as part of this planning application and design consideration and mitigation measures have been adopted where appropriate to minimise potential impacts.

Parish Council

6.46 Prior the submission of the Application (and the public consultation exercise outlined above), the applicant approached Fillongley Parish Council to make them aware of the proposals. Through discussions with the Clerk, the offer of a meeting was accepted and Enviromena representatives attended the Parish Council meeting on Thursday 19th January 2023.

6.47 Enviromena presented on the background and context to the site, the need for renewable energy development and ran through some of the key planning / developmental considerations. Following the Enviromena briefing, a Q&A session took place which was useful for both parties.

6.48 Enviromena promised to return to future parish council meetings as the project progressed through the planning application process.

7.0 PLANNING POLICY CONTEXT

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

7.2 The Site is located within the administrative boundary of North Warwickshire Borough Council. The Development Plan comprises of:

- North Warwickshire Local Plan (2011-2033) (Adopted 2021)
- Fillongley Neighbourhood Plan (Adopted 2019)

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

Local Planning Policy

North Warwickshire Local Plan 2011-2033

7.4 The North Warwickshire Local Plan 2011-2033 was formally adopted in September 2021. It forms part of the development plan for the Borough and is a main consideration in the determination of planning applications.

7.5 The Local Plan relates to the whole Borough and provides a strategy for delivering growth up to 2033. The map extract below is taken from the Local Plan policy map and shows that the Sites only policy it is subject to is Green Belt designation.

Figure 7.1 Extract from the North Warwickshire Local Plan Policy Map (2021). Location of Site indicated in red.

7.6 The below table outlines the relevant Local Plan policies to the proposed development.

Table 7.1 North Warwickshire Local Plan Relevant Policies

Policy	Summary
LP1 Sustainable Development	Sets out and reiterates the presumption in the NPPF and states that planning applications that accord with the policies in the Local Plan will be approved without delay unless material considerations indicate otherwise.
LP3 Green Belt	Defines the extent of the Green Belt and confirms that inappropriate development is by definition harmful to the Green Belt and should not be approved except in Very Special Circumstances.
LP14 Landscape	Outlines that development should look to conserve, enhance, and where appropriate restore landscape character as well as promote a landscape able to adapt to climate change.
LP15 Historic Environment	State that the Council is committed to the importance of the borough's historic environment and that the quality, character, diversity, and local distinctiveness of the historic environment will be conserved or enhanced.
LP16 Natural Environment	States that the Council recognises the importance of the natural environment to the Borough's local character, identity, and distinctiveness. The natural environment will be enhanced and protected as appropriate relative to the nature of development proposed.
LP23 Transport Assessments	Transport Assessments are required to accompany development proposals. Assessments should address impacts on both the local and strategic highway networks and should be bespoke to the nature of the development proposals.
LP29 Development Considerations	Clearly outlines that development should meet the needs of residents and businesses without compromising the ability of future generations to enjoy the same quality of life that the present generation aspires to.
LP30 Built Form	it is expected that new buildings integrate well into the surrounding environment so that a local sense of place is reinforced. The policy seeks to protect rural character and openness and to avoid suburbanisation of the countryside. The policy introduces a set of criteria against which design issues can be assessed.
LP33 Water and Flood Risk Management	Development on land in Flood Zones 3 will only be permitted following a sequential and exceptions test where required.
LP35 Renewable Energy and Energy Efficiency	Renewable energy projects will be supported where they respect the capacity and sensitivity of the landscape and communities to accommodate them. Focus will be given to their impact on landscape quality, sites or features of natural importance, historic/ cultural importance, residential amenity, and the local economy.

Fillongley Neighbourhood Plan (2018-2034)

7.7 The Fillongley Neighbourhood Plan ("FNP") was adopted in August 2019 and covers the entirety of the Site. The FNP covers the period 2018 – 2034 and includes policies on the

built environment, natural environment, flooding, housing, economy, heritage, and transport.

7.8 The FNP does not allocate sites for development or include any policies on renewable energies. However, the FNP at paragraph 2.2.9 notes that the residents surveyed as part of the plan-making process indicated they wanted to see policies to encourage sustainable development and renewable energy. The pertinent FNP policy is Policy FNP02: Natural Environment which sets out a series of principles, the most pertinent of which are as follows:

- No adverse impacts on the visual appearance and important scenic aspects of the village centre (the setting) and other rural and natural features in the landscape.
- Mapped footpaths should be protected and enhanced wherever possible.
- S106 payment should wherever possible go towards biodiversity improvements in the locality of the development.

Material Considerations

National Planning Policy Framework

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

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

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

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

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

prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

7.12 NPPF paragraph 10 advises that:

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

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

'c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protects areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

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

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

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

'Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

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

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;…

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'

7.16 Paragraph 38 states that local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available and work proactively with applicants to secure developments

that will improve the economic, social and environmental conditions of the area. Decision-makes at every level should seek to approve applications for sustainable development where possible.

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

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

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

7.20 Paragraph 158 sets out that, when determining planning applications for renewable and low-carbon development, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even small scale projects provide a valuable contribution to cutting greenhouse gas emissions; and approve the application it its impacts are (or can be made) acceptable.

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

National Planning Practice Guidance

7.22 In March 2014, the Government published its online Planning Practice Guidance ('PPG'). This web-based resource brings together planning guidance on various topics including renewable and low carbon energy.

7.23 PPG Paragraph 001 (Reference ID: 5-001-20140306) sets out why planning for renewable and low-carbon energy is important. It advises:

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

7.24 PPG paragraph: 010 (reference ID: 5-010-20140306) states renewable energy developments should be acceptable for their proposed location. Along with factors

applicable to acceptability for any form of renewable energy development, there are considerations for each technology.

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

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

7.26 Paragraph: 013 goes on to state:

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

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

National Policy Statements

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

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

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

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

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

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

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

7.33 Draft EN-1 states at Paragraph 1.21:

> **"In England and Wales this NPS may be a material consideration in decision making on applications that fall under the Town and Country**

Planning Act 1990 (as amended). Whether, and to what extent, this NPS is a material consideration will be judged on a case by case basis and will depend upon the extent to which the matters are already covered by applicable planning policy."

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

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

7.35 Draft NPS for Renewable Energy Infrastructure (EN-3) (September 2021)xii:

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

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

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

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

- Access tracks;
- Site layout, design, and appearance (including any flood risk);
- Security and lighting;
- Project lifetimes;

- Flexibility (to account for technology types and advancements);
- Biodiversity and nature conservation;
- Landscape, visual and residential amenity;
- Glint and glare;
- Cultural heritage; and
- Construction impacts including traffic and transport noise and vibration.

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

Kyoto Protocol (2005)

7.39 In 2005, the Kyoto Protocol came into effect providing the first ever framework for international climate action. Under the Protocol, the United Kingdom, together with 37 other industrialised countries, committed to reducing greenhouse gas emissions by 5.2% from 1990 levels by the year 2012.

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

7.40 The central aim of the Paris Agreement is to strengthen the global response to the threat of climate change by keeping a global temperature rise below 2 degrees and to pursue efforts to limit the temperature increase even further to 1.5 degrees. Additionally, it aims to strengthen the ability of countries to deal with the impacts of climate change. To reach these ambitious goals appropriate financial flows, a new technology framework, and an enhanced capacity building framework will be put in place, thus supporting action by developing countries and the most vulnerable countries, in line with their own national objectives. The Agreement also provides for enhanced transparency of action and support through a more robust framework.

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

7.41 The Climate Change Act (2008) (2050 Target Amendment) Order 2019iii sets a legally binding target for reducing greenhouse gas ('GHG') emissions, in particular carbon dioxide ('CO2'). As originally enacted, these targets include a reduction of GHG by 100% (on 1990 levels) by 2050 and a requirement that domestic emissions are reduced by no less than 3% each year. In setting these targets, the Act established the Committee for Climate Change ('CCC'), which is responsible for setting interim binding targets over five-year periods.

7.42 In May 2019, the CCC recommend a new emissions target for the UK: a 100% reduction ('net zero') of emissions by 2050. This change in legislation mandating a 100% reduction in CO2 emissions by 2050 was approved by the House of Commons on 24th June 2019 and the House of Lords on 26th June 2019 and is now the Government's statutory carbon reduction obligation.

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

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

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

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

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

7.46 The NIS is relevant to the Development as it sets out how the Government will address the issues we face and how it will build back fairer, faster and greener. The NIS aims to provide investors with clarity over the Government's plans so they can look at the UK with confidence and help deliver the upgrades and projects needed across the country.

Energy White Paper (December 2020)

7.47 'The Energy White Paper – Powering our Net Zero Future' (the 'White Paper') was published as a long-term strategic vision for the UK energy system. It establishes the Government's goal of a decisive shift from fossil fuels to clean energy in power, buildings, and industry, whilst creating jobs and growing the economy. The White Paper

is clear that: "*Onshore wind and solar will be key building blocks of the future generation mix, along with offshore wind.*"

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

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

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

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

British Energy Security Strategy (April 2022)

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

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

Energy Security Bill (July 2022)

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

Climate Emergency Declaration (June 2019)

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

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

8.0 ASSESSMENT OF DEVELOPMENT

8.1 This section identifies the main planning issues and provides an analysis of how the development proposals accord with planning policy at national and local levels.

8.2 The proposed Solar PV Farm at Land at Fillongley has been informed by a series of technical assessments and through consultation with Parish Council members and the local community.

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

- The Principle of Development
- Green Belt;
- Landscape and Visual Impacts;
- Heritage Impacts;
- Ecology and Trees;
- Use of Agricultural Land;
- Amenity Impacts;
- Glint and Glare;
- Flood Risk & Drainage; and
- Highways and Access;

The Principle of Development

8.4 The Development is a ground mounted solar farm supplying up to 45.9MW of electricity to the National Grid.

8.5 The increase in renewable energy generation is seen to be of paramount importance within the UK to achieve the legal target under the Climate Change Act, requiring all greenhouse gas emissions to be net zero by 2050. The recent COP27 summit further highlighted the urgent need to respond to a rapidly changing climate and a shift from fossil fuels to renewable energy sources.

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

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

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

8.9 There is clear support from national, and local administration levels for the maximisation of renewable energy generation in the UK. The North Warwickshire Local Plan Policies LP1 *Sustainable Development*, LP29 *Development Considerations* and LP35 *Renewable Energy and Energy Efficiency* make it clear that renewable energy is a factor that should be considered during the preparation of all new developments. Furthermore, whilst it does not contain any specific policies the Fillongley Neighbourhood Plan sets out general support for renewable energy schemes subject to there being no significant harm.

8.10 The Developments contribution of 45.9MW of clean renewable electricity is significant in meeting both national and local renewable energy targets. It is a significant environmental benefit, meeting the electrical needs of approximately 17,100 homes. This provides a CO2 displacement of 11,300 tonnes compared to the same energy from fossil fuel sources.

8.11 Accordingly, the principle of development fully accords with the thrust of national and local planning policy namely Local Plan Policies LP1, LP29 and LP35 and principles within Fillongley Neighbourhood Plan in achieving sustainable development and very significant, positive weight can be placed on the benefits of renewable energy generation and the associated reduction in carbon emissions.

Green Belt

8.12 The Site is located within the North Warwickshire Green Belt. The starting point for assessing development in the Green Belt is NPPF paragraph 137:

> ***"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"***

8.13 The NPPF states that new buildings in the Green Belt are inappropriate. Paragraphs 145 and 146 identify very limited exceptions to this. The development proposal does not fit in with the criteria of appropriate development and therefore comprises 'inappropriate development' within the Green Belt. Furthermore, North Warwickshire Local Plan Policy LP3 indicates that development on Green Belt will be resisted and only allowed where it conforms with national policy. Therefore, the development of a solar farm in the Green Belt would represent inappropriate development in policy terms.

8.14 However, NPPF Paragraph 144 notes that it is possible, when very special circumstances are demonstrated, that this potential harm to the Green Belt could be outweighed by other considerations. In this regard it is also highlighted that NPPF paragraph 151 refers specifically to proposed renewable energy development within the Green Belt and advises:

> ***"When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources."***

8.15 The NPPF as such makes provision for renewable energy projects within the Green Belt.

8.16 It is therefore necessary to apply the two tests of harm set out at paragraph 144:

a. The amount of harm (if any) to the Green Belt; and

b. The amount of other harm.

8.17 Thereafter it is necessary to carry out a planning balancing exercise, which is a matter of planning judgement, to establish whether any harm to the Green Belt is outweighed by other considerations including benefits of the Development - of which production of renewable energy is highlighted by the NPPF.

Harm to Green Belt – Concept of Openness

8.18 The fundamental aim of Green Belt policy is to keep land permanently open. Specifically, NPPF paragraph 137 sets out that the concept of "openness" is to prevent urban sprawl.

8.19 Paragraph: 001 Reference ID: 64-001-20190722 of the PPG details factors to be taken into account when considering the potential impact of development on the openness of the Green Belt. These include:

- spatial and visual aspects – the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – considering any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation

8.20 These considerations are each discussed in turn.

Visual and Spatial Aspects

8.21 Case law (Appeal Ref APP/P2935/A/14/3000634) has detailed that openness is defined by '*an absence of buildings or other forms of development*.' It is therefore accepted that by its nature the Development would reduce openness. In this regard, the case of Turner (John Turner v Secretary of State for Communities and Local Government and East Dorset District Council [2016] EWCA Civ 466) clarifies that a visual dimension should be included within any Green Belt Assessment and Supreme Court ruling (Case: Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council 2020) has established that openness is a matter of planning judgement rather than a legal principle.

8.22 Visual impacts are explored in the 'Landscape and Visual Amenity' section of this Statement. The baseline landscape character and setting, potential impacts arising from the Development and proposed mitigation of effects have been appraised within the accompanying Landscape and Visual Appraisal (LVA) prepared by FCPR. The LVA demonstrates that the Site is not subject to statutory landscape designation and is not immediately adjacent to sensitive visual receptors (nearest residential properties are c.600m distance from Site boundary). The Site's visual connection to the wider landscape is limited by existing boundary hedgerows and trees, which are proposed to be largely retained and enhanced. Retention and enhancement of vegetation cover will not only maintain the key defining landscape characteristics of the Site but will also effectively screen the Development from sensitive receptors and contribute to biodiversity gains.

8.23 The Development would not result in urban sprawl for two reasons firstly due to the nature of the proposals for energy generation it would not attract further development to locate beside it, and secondly given its location, some significant distance from any large built-up areas it would not result in the merging of settlements. Consequently, there is no conflict in terms of openness relating to visual and spatial impact, nor is there conflict with the first two purposes of the Green Belt, checking unrestricted urban sprawl and merging of towns.

8.24 The design of the scheme has also considered the need to minimise the potential impact upon heritage assets. The potential for impact upon designated and undesignated assets is considered in the following 'heritage Impacts' section of this Statement but in summary the Site is not covered by any statutory heritage designations and there are no designated heritage assets within the Site's boundaries. There are no conservation areas within 2km radius of the site but there are several Listed structures, and a Scheduled Ancient Monument is located c.500m of the Sites northern boundary. Through appropriate landscape buffers significant adverse impact on these assets is avoided and as such there will be no conflict with the fourth purpose of the Green Belt, preserving the setting and character of historic towns.

Duration and Remediability

8.25 The second point of the PPG relates to the duration of the development, and its ability to be adequately remediated.

8.26 It is emphasised that solar farm development is a temporary and fully reversible type of development and therefore can assure the requirement for land to be kept permanently open. Planning permission is sought for a period of up to 40 years, following which, the Site will be decommissioned and restored to its current state. Should planning permission be granted a suitable condition can be applied to secure decommissioning remediation of the land at the end of the temporary period.

8.27 In addition, the Site can continue to be used for agricultural purposes and will not lead to any permanent loss of farming activities at this location. Whilst the Site is currently arable, the Applicant is supportive of dual use of the land for gentle grazing of livestock, and this will be investigated with the landowner. As the Site can be utilised for sheep grazing it does not therefore result in a complete loss of agricultural land or cessation of agricultural activities.

Activity Generated

8.28 The third criteria in the PPG for assessing impact on openness is '*the degree of activity likely to be generated, such as traffic generation'*.

8.29 As detailed within the Transport Statement accompanying the application, during the operational phase the site will generate negligible associated traffic movements, due to minimal on-site activity being required. Vehicle trips will be limited to period inspections, repair, and habitat management. The frequency of vehicle trips during the operational phase is predicted to be two maintenance visits per month, typically be made by small vans.

8.30 Due to the very low number of vehicle movements predicted during the operational period, the proposed development will have a *de minimis* impact on the operation of the local highway network. The minimal activity generated will therefore have a negligible impact on the openness of the Green Belt.

Other Harm

8.31 Consideration has been given to 'other harm' regarding landscape and visual impact, heritage, biodiversity, agricultural land, environmental health, flood risk, and traffic and access. The supporting assessments are set out in the subsections below, identifying present situation and identifying, where necessary, any mitigation measures to reduce harm arising from the Development.

8.32 In summary, harm identified is localised and can be appropriately mitigated through a range of measures. These mitigation measures are offered and can be secured via appropriately worded condition to any planning permission granted to ensure their delivery. It is concluded from the following sub-sections that limited weight should be applied to "other harm" when undertaking the planning balance in accordance with paragraph 148 of the NPPF and local policies.

Very Special Circumstances: Planning Balance

8.33 The NPPF is clear that very special circumstances need to exist for inappropriate development to be approved in the Green Belt. Very special circumstances will not exist unless the harm to the Green Belt and any other harm are clearly outweighed by other considerations.

8.34 NPPF Paragraph 147 goes on to note that "very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources". The importance of such energy resources has been growing, and the UK has committed to becoming carbon neutral by 2050. It is also highlighted that Warwickshire County Council, supported by sub districts including North Warwickshire, declared a Climate Emergency in 2019, aiming for its activities to be carbon neutral by 2030.

8.35 The NPPF supports these aspirations by stating (at Paragraph 152) that "*the planning system should support transition to a low carbon future...It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience…and support renewable and low carbon energy and associated infrastructure*".

8.36 In summary, it is accepted that the proposal would cause harm to the Green Belt by reason of inappropriateness. However, the level of harm is significantly limited due to the following:

- The Development will generate up to 45.9MW of clean renewable energy to the Grid, powering the equivalent of 15,800 homes and saving 10,900 tonnes of CO2 per year, making a significant contribution to meeting global, national and local carbon reduction targets;
- The limited landscape and visual impacts, due to containing the arrays within existing field enclosures allowing for maximised retention and enhancement of boundary vegetation to ensure that the scheme fully integrates into the surrounding landscape character;
- The rural location of the Site and the nature of the Proposals will not result in merging of settlements, unrestricted urban sprawl and preserve setting of historic towns;
- The temporary and fully reversible nature of the Development;
- Potential for continued dual agricultural use of the Site; and
- Minimal level of activity generated by the development including very minimal traffic generated.

8.37 It is considered that very substantial positive weight should be accorded to the scale of generation of renewable energy and associated significant reduction in carbon emissions. This constitutes Very Special Circumstances which significantly outweigh the very limited harm to the Green Belt.

8.38 Consequently, the Development accords with relevant NPPF and PPG policy relating to renewable energy development, the Green Belt, use of agricultural land and sustainable development, as well as with North Warwickshire local Plan Policies LP1, LP3 and LP35.

Landscape and Visual Impact

8.39 A Landscape and Visual Appraisal has been prepared by landscape consultants FCPR and accompanies the application. The LVA identifies that the visual envelope of the Development is restricted by screening elements such as hedgerows, trees, settlement edge, the M6 corridor and topography. Visual receptors include residential properties, of which there are relatively few, public rights of way, the M6 and local roads. Generally, receptors that are affected are largely limited to those located nearest the Site.

8.40 The development is contained by existing features and proposed additional landscape planting. This creates a green framework for development that can accommodate the solar farm and creates an appropriate landscape setting for the Development, with new

planting filtering views. Overall, the development is likely to contribute to a very limited degree of visual change.

8.41 The majority of residential receptors that will be affected are located along the southern boundary of Fillongley Views from the properties to the Site will be available from first floor level, resultant long term visual effects are considered to be Minor Adverse. Most of the existing properties in the area will be unaffected by the proposed development and resultant long term visual effects are considered to be Minor or Negligible Adverse.

8.42 Views of the proposed development from public rights of way will largely be limited to those in closest proximity to the Site, affording close and medium range visibility. It is considered that initial resultant visual effects will vary between Major/Moderate Adverse along PRoW WK|175|M294/1 and Negligible/None where they are more distant along the western National Trail Heart of England Way.

8.43 In conclusion, it is assessed that the Site's landscape character has the ability in which to absorb development of the scale and type proposed. The development of a solar farm and new planting is an appropriate design approach within this landscape context. The additional planting would be multifunctional in its design and management, so that it performs a range of functions, to include benefits for biodiversity, screening, and climate change. The proposals include carefully considered design measures and landscape strategies to minimise the level of adverse effects on landscape character and visual amenity.

8.44 New tree planting to the northern and western boundaries will help assimilate the development into its surroundings. The proposed planting will not only help to break up the solar farm and soften the appearance of the new built form overall but will also assist in filtering views generally. It is also reiterated that the solar farm is sought for a temporary period, upon decommissioning the infrastructure will be removed and Site fully remediated to its previous state. As such any landscape and visual impacts are not only localised but are temporary and fully reversable.

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

8.45 It is assessed that the design and mitigation approaches adopted by the proposed development are appropriate and would minimise impacts on landscape and visual

receptors in the longer term. The scheme has an intended 40-year lifespan following which the Site will be fully returned to its present state. In conclusion, it is assessed that the proposed development would not result in any unacceptable long-term landscape and visual effects. Impacts are localised, temporary and fully reversible. As such the Development is in accordance with the principles of Fillongley Neighbourhood Plan Policy FNP02, Local Plan Policy LP14 and NPPF Paragraph 174.

Heritage Impacts

8.46 The planning application is accompanied by a heritage and archaeology assessment prepared by BWB Consulting. The assessment provides a detailed understanding of the baseline historic environment and built heritage assets within a 1km study area of the Site to assess the potential impact on built heritage and determine the potential for archaeological remains to be present within the site.

8.47 The assessment concludes that There will be no direct physical impact on designated heritage assets resulting from the Development. One non-designated asset, an outfarm (MWA31907), is recorded within the Site. Now demolished, aerial images may suggest some remains survive below ground however no evidence for the structure remains above ground.

8.48 The assessment of designated heritage assets concluded the Site does not contribute to the setting or significance of most of the designated assets within the study area and there will be no impact on their setting. Four of the assets within the study area were assessed in further detail due to the intervisibility of the Site and the assets. Three of these assets were located in a group at Park House (1186219, 1034837 and 1034838), approximately 400m north of the Site. The other asset was White House Farmhouse (1034868) to the west of the Site. In both cases, further assessment concluded the Site does not contribute to the setting or significance of the assets despite its contribution to the rural character of the wider surroundings. The impact upon the setting will be negligible and the significance of effect will be neutral in both cases. The impacts are less than substantial in terms of the National Planning Policy Framework (NPPF). There are no recommendations required to mitigate any impacts on any designated heritage assets.

8.49 There is a relative paucity of archaeological investigation within the study area. Archaeological remains that may be present that relate to the post-medieval period would have low importance and could include the relict remains of cultivation furrows and field boundaries. Any below ground remains of the outfarm mentioned would also have low importance. Any remains from other periods have the potential to have low to moderate importance if present.

8.50 Further detail will be provided on design, and in particular the depth of any invasive groundworks. However, by their nature, the footprint of solar farms and the amount of ground-breaking that is required is generally limited. Impacts depend on the depth of the archaeological horizon, the depth of excavation any archaeological remains present, their preservation and significance. Due to the limited nature of the excavations required, the impact is assessed as being less than substantial in NPPF terms.

8.51 Consequently, the Development is in accordance with Local Plan Policy LP16 and NPPF Section 16 with regards to limited impact on heritage assets.

Ecology and Trees

8.52 The impact of the Proposed Development on the natural environment is considered in the Preliminary Ecological Appraisal (PEA) prepared by Arbortech and the Arboricultural Impact Assessment (AIA) prepared by Iain Tavendale.

8.53 The PEA describes the baseline ecological conditions at the site, evaluates habitats within the survey area in the context of the wider environment and describes the suitability of those habitats for notable or protected species. It identifies possible ecological constraints as a result of the Development and summarises the requirements for further surveys and mitigation measures. The PEA is informed by a desk-based study of records and a field survey.

8.54 The PEA confirms that the Site is not subject to any statutory or non-statutory designation and that none such are present within 2km radius. The Site does not contain any notable habitats and no protected or notable plant species were recorded as present on the Site. The Site also offers limited opportunities for any notable or protected fauna. Given the Sites agricultural use, habitats of value are limited to the Site boundaries.

8.55 Maximised retention of existing field hedgerows, trees, and other landscape features and habitats such as the watercourse at the north of the Site will ensure minimal disruption to existing wildlife. Pausing agricultural activities on the Site and new planting of hedgerow, trees and meadow grassland will result in additional benefits for wildlife through improved, shelter, commuting and foraging opportunities. Further the Applicant is also willing to install appropriate bat and bird boxes on the Site to ensure additional wildlife benefits.

8.56 It is also highlighted that for security reasons it is necessary for the Site to be subject to fencing, however this is proposed as deer-proof fencing, comprising of timber posts with wide wire mesh. The mesh allows for animals smaller than deer to continue to access and utilise the Site but is also visually less intrusive.

8.57 In respect of arboricultural matters, most of the trees exist on the site boundaries and to the far side of existing water course. Two groups run through the main body of the site and several individual specimens and one woodland exist randomly through the area. At present no detailed management appears to have been undertaken in recent years to trees present on the Site other than pruning to provide reasonable clearances for agricultural operations.

8.58 The majority of all hedgerows have generally been flail cut on a regular basis. Where they are within the farmland formal features have been created, where hedgerows abut the land, faces have simply been cut back to facilitate agricultural operations.

8.59 To construct the proposed solar arrays and associated ground works, 3no. trees will require removal. However, this very minimal loss will be adequately mitigated though replacement planting. Overall, there will be a net gain of hedgerow and trees present on the Site. The proposed solar arrays and associated works have been designed to adhere to guidance within BS5837:2012 in that they are located outside the root protection areas of trees to be retained. A minimum buffer of 3m is provided between arrays and existing trees and hedgerows. In this regard the AIA highlights that historic land usage has resulted in deep and repeated cultivation of all soils tight up to trees hedges and site boundaries. It is highly probable therefore that there are no significant tree roots within the site and no harm will be caused by the proposed operations.

8.60 The AIA concludes there will be no impacts upon any visual amenity derived from public areas outside the Site, and no impacts upon the environment as a direct result of the Development It is reasonable to conclude therefore that in respect of arboricultural matters the Development would likely result in a moderately beneficial impact to the existing treescape and its future viability.

8.61 In summary, due to maximised retention of existing trees, hedgerows, and habitats there would be no significant detrimental impacts on the natural environment, rather there would be several benefits from the increased landscape planting and mitigation measures proposed. The Development therefore fully complies with NPPF Paragraph 174 and Local Plan Policy LP16.

Use of Agricultural Land

8.62 NPPF (para 174) seeks to prevent the loss of best and most versatile (BMV) land, defined as Grades 1, 2 and 3a in the MAFF 1988 guidance for grading the quality of agricultural land. Policy requires the proposed use of any agricultural land to be necessary and for poorer quality land to be used in preference to higher quality land.

8.63 An assessment of agricultural land quality was undertaken by Roberts Environmental to determine agricultural land quality and accompanies the application. This confirmed the Site to comprise predominantly of Grade 2 (24% of the Site) and Grade 3a (71% of the Site) with a small extent of Grade 3b (3%) agricultural land. As such the Site comprises predominantly of BMV agricultural land.

8.64 In this regard we note that Draft NPS *Renewable Energy Infrastructure* (EN-3) provides additional clarity on how BMV and solar farm applications specifically should be considered. Paragraph 2.48.15 of EN-3 states that: "*the development of ground mounted solar arrays is not prohibited on sites of agricultural land classified 1, 2, 3a*" and at paragraph 2.48.13 that: "*land type should not be a predominating factor in determining the suitability of the site location*". Whist still in draft format, and therefore can be afforded limited weight in decision making, EN-3 nevertheless provides a steer on the preferred direction of travel for national policy and decision making.

8.65 Notwithstanding, the provisions of EN-3, it is also highlighted that the MAFF (Pre 1988) ALC information shows that outside of urban areas, the West Midlands region is predominantly comprised of 'Good' (Grade 3a) and a significant portion of 'very good' (Grade 2) agricultural land. When considered against the extent of this wider provision the temporary removal of the 61Ha is negligible and would not detrimentally impact on the overall availability of BMV productive agricultural land in the Borough or West Midlands region.

8.66 Furthermore, the Development will not result in the irreversible loss of any agricultural land, either temporarily or permanently. Unlike other forms of development such as residential or industrial, due to the 'light-touch' construction methods, solar farm development is wholly reversible. The solar farm is sought for a temporary period of 40 years, the Development will not change the classification of the land from agricultural. In addition, the Applicant encourages grazing of livestock within solar farms and as such dual agricultural use is currently being considered. Therefore, the Site could continue to be used for farm operations.

8.67 It is also highlighted that leaving the land fallow and seeding the land under and around solar arrays as species-rich grassland will be a benefit to soil health and future agricultural land quality. It is anticipated that soil health will be improved through an increase in soil organic matter, the diversity of soil flora, fauna and microbes, and improved soil structure.

8.68 The use of agricultural land is necessary in this case as the location of the Development is driven by its requirement to be close to a feasible grid POC. The Applicant has searched for suitable and available sites, recognising that the viability of any energy

project reduces the further away it gets from the POC. This is not simply because of increased construction and development costs associated with increased distances, but mindful that the greater the distance from a POC, the more energy is lost in transmission thereby defeating the objective of increasing renewable energy generation to support the UK's transition to Net Zero.

7.55 The use of agricultural land is necessary and through appropriate landscaping strategy and potential for dual agricultural use the Development would not undermine national agricultural interests in accordance with NPPF paragraph 174.

Amenity Impacts

8.69 The nature of the Proposed Development is such that it is not likely to cause any form of pollution during its operational stage as there are no significant noise sources, increase in traffic would be low and it would not be illuminated at night.

8.70 The noise generated from the development will be minimal. The inverters and accompanying batteries are located be in the centre of the solar panels to reduce visual and noise impacts on surrounding receptors. Given the location of the inverters, and the existing background noise, principally from the M6, there would be no adverse noise impact on any neighbouring sensitive receptors.

8.71 The Development does not include any operations or processes that would detrimentally affect air quality.

8.72 The Proposed Development includes no plans to divert or close any PRoWs. Where views into the Site are likely to be experienced from existing PRoWs and surrounding residential properties, an appropriate landscaping strategy has been proposed to provide screening of the site.

8.73 The Development therefore accords with local Plan Policy LP29 and NPPF paragraph 127 in ensuring good levels of residential amenity are maintained.

Glint and Glare

8.74 A Glint and Glare Assessment has been prepared by Pager Power and Accompanies the application. The assessment considers the possible impact upon road safety, residential amenity, and aviation activity associated with Birmingham International Airport and Camp Farm Airstrip.

8.75 The assessment concludes that due to existing landscaping and topography any impact towards identified residential dwellings, road users along the B4102 Meriden Road and the surrounding aviation activity will be of low impact and as such no mitigation is

required. The assessment however has highlighted the potential for some impact towards road users travelling along some sections of the M6 where there are gaps in the existing boundary vegetation. Consequently, additional shrub and tree landscape planting is proposed along the southern boundary to effectively screen the Site from the M6 to minimise disruption to car users.

8.76 The Development accords with Local Plan Policy LP30 in ensuring no adverse effects from glare.

Flood Risk & Drainage

8.77 A Flood Risk Assessment and Drainage Strategy has been prepared by BWB to determine the potential sources of flooding on the Site, impacts on flooding elsewhere and mitigation measures to reduce any impact.

8.78 The Site is located wholly within Flood Zone 1 (Low Probability). However, extents of surface water Flood Zone 2 and 3 are shown at the northwest Site boundary, associated with Bourne Brook and drainage ditches present. Bourne Brook cross the site from the southern boundary to the northern boundary and an Unnamed Ordinary Watercourse (UOW) from the southern boundary to the eastern boundary.

8.79 Other flood risk sources such as sewer, groundwater and reservoirs have also been assessed and are considered to pose a low risk to the site.

8.80 The proposed surface water drainage strategy is based upon a range of recognised research and technical guidance. Research undertaken by Cook and McCuen (2013) found that providing full vegetation cover beneath the solar panels is maintained, the change in runoff characteristics from solar farm sites is likely to be insignificant and that ground cover has a much more important control over runoff. The proposed strategy aims to minimise the compaction of soil during the construction and operation of the proposed development with appropriate seeded vegetation provided below and around rows of the solar panels and under the arrays to promote low erosivity sheet flow during operation of the solar farm. The vegetation will be managed organically and will be mowed periodically or used for light grazing. This means that excluding the access tracks and ancillary buildings the Site will be fully vegetated species rich pastoral grassland. These mitigation measures will be detailed within a Construction Environmental Management Plan (CEMP) and landscape strategy for the proposed development.

8.81 As an additional resilience measure, it is proposed that interception swales are constructed at the most downgradient row of panels to act as a form of mitigation and betterment, should the ground beneath the panels become patchy or bare during the lifetime of the development.

8.82 The drainage strategy will ensure that the surface run off is intercepted and discharged in a controlled manner from the Site, therefore reducing flood risk. Subject to these measures the Development will have negligible impact on the post-development surface water runoff rates and volumes.

8.83 It is also noted that in accordance with local guidance, appropriate easements have provided around the existing drainage ditches and watercourses to ensure access for their maintenance.

8.84 Therefore, it has been demonstrated that the Development is safe from all types of flooding due to existing conditions or through flood risk management, will not increase flood risk elsewhere in accordance with NPPF Paragraph 159 and Local Plan Policy LP33.

Highways and Access

8.85 The Transport Statement which accompanies the application assesses the existing access conditions, the impact of the Development in terms of trip generation, vehicle types, routing, and safety. It sets out that the Development generates a low level of vehicular activity, during both the construction and operational phases.

8.86 The construction period of the Development is expected to approximately 30 weeks and generate an average of 6 two-way vehicle trips per day. At this scale the Development will not materially impact on the surrounding highway network, due to the proximity of the Site to the Strategic Road Network it is likely that commercial vehicle movements in the vicinity of the site are sufficiently high that an increase of six two-way daily vehicle movements is unlikely to cause a disturbance to other users. It is also highlighted that construction of the Development will not require any abnormal loads.

8.87 On completion of the 28-week construction period, construction traffic would cease. There would therefore be no residual traffic related impacts arising from the temporary construction phase of the proposed development.

8.88 During its operational phase traffic movements are expected to be minimal. Operational traffic would comprise one van accessing the Site up to twice per month amounting to four vehicle movements per month.

8.89 Traffic volumes of this magnitude would be imperceptible on a daily basis there are no residual traffic related impacts arising from the permanent operational phase of the proposed development.

8.90 With regards to Site access it is proposed that the existing access is utilised from Meriden Road at the Site's south western corner. The national speed limit of 60 miles per hour applies to Meriden Road, requiring a 215m visibility splay. To achieve the required

visibility of 215m, vegetation overgrown within the verge of the B4102 will be trimmed back.

8.91 In accordance with Local Plan Policy LP23 and paragraph 111 of the NPPF there are no transport or highway reasons why planning permission should be prevented.

9.0 CONCLUSIONS

9.1 The Applicant is proposing to develop a Solar Farm on land east of Meriden Road, Fillongley, North Warwickshire. The Development will provide up to 45.9MW of electricity to the Grid and is proposed on a temporary basis for 40 years.

9.2 The Development would provide a clean, renewable, and sustainable form of electricity and will make a valuable contribution meeting national targets for both energy supply and low carbon energy development.

9.3 The principle of renewable energy, such as solar power, is strongly supported by both local and national planning policy. There is therefore a significant and demonstrable need for the Development. This represents very special circumstances which outweigh the impacts of the Development on the Green Belt, which in any case are limited, particularly given that the Development is both temporary and reversible. In this regard it is also acknowledged that whilst the Site comprises of BMV land the nature of solar farm development is such that the Site can be fully remediated to its current state. The Development will not result in the permanent loss of BMV land but rather pause its productive use. It is also highlighted that the Applicant encourages grazing on their sites and as such a dual energy-agricultural use could be undertaken ensuring the Site maintains agricultural use.

9.4 It has been demonstrated that the Development complies with planning policy and that impacts of the Development are limited and, where necessary, mitigation measures have been set out to reduce potential impacts of the Development.

9.5 In addition to the significant benefits associated with the generation of renewable energy, the Development would deliver further benefits in terms of habitat creation and biodiversity gains, which further weigh in favour of the Development.

9.6 In summary, the Development accords with the relevant policies of the development plan and would deliver significant benefits and any potential impacts can be adequately mitigated. The Applicant therefore respectfully requests that planning permission is granted.

Appendix A

FILLONGLEY SOLAR FARM

Development of a 47.7MW solar farm near Fillongley, Warwickshire.

BACKGROUND

Enviromena is proposing to develop, construct and operate a 47.7MW solar park on land near the village of Fillongley. The application site area will be approximately 60 hectares (148 acres).

The proposal involves the construction and operation of a solar farm that will connect into the local electricity network. It will comprise of solar modules, solar inverters, and associated works, including landscaping. The development will also include the construction of a substation. At the end of its 40-year operational life, the equipment will be removed (and recycled) and the entire site will be restored to its original form.

The Fillongley Solar Farm will deliver clean affordable electricity to the National Grid. The project presents an opportunity to achieving the UKs climate goals to transition to net-zero.

The 47.7MW of electricity that could be delivered by Fillongley Solar Farm is equivalent to powering approximately 17,100 homes annually, saving 11,300 tons of carbon in emissions.

It is acknowledged that the site lies within the Green Belt and as such an appropriate assessment will accompany the planning application. The site, however, is not covered by any other heritage, ecology, or landscape designations. It is noted that there are heritage assets within proximity of the site, and the forthcoming application will have regard to these assets. The Site has been chosen as it has physical characteristics that make it particularly suitable for solar capture and there being local grid capacity to export the electricity generated.

Further details can be found on the project website: **fillongleysolarfarm.co.uk**

We are seeking views from residents on the Fillongley solar farm proposal ahead of the submission of a planning application. Feedback can be provided via the feedback form enclosed and either posted or emailed via the addresses provided or the form can be completed electronically via the project website. We would request that all comments are received by 30 January 2023.

NET ZERO

In 2019, the UK Government set international precedent by passing laws to become carbon neutral by 2050. Carbon neutral is about finding the balance between greenhouse gas emissions being produced, and greenhouse gases being removed from the environment.

North Warwickshire Borough Council recently consulted on their Climate Change Action Plan which outlines how the Council will reduce carbon emissions. There is a clear commitment to tackle the impacts of climate change within the Borough.

BENEFITS OF THE PROJECT

- Fillongley Solar Farm will power approximately 17,100 homes annually
- Saving 11,300 tonnes of CO2 per year
- Clean green technology that supports biodiversity
- Domestic reliable electricity generation that supports UK energy security
- Generate over £75,000 per year in business rates

Site Location Plan

ENVIROMENA

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Frequently Asked Questions

WHY IS THIS PROJECT NEEDED?

The proposed scheme will contribute to the country's growing need for clean electricity generation, making a vital contribution to achieving the Government's commitment to net-zero carbon emissions and making the electricity network completely green by 2035.

The security of the UK's energy supply has recently come into sharp focus. Domestically generated clean electricity at scale, is key to securing a reliable source of power for UK homes and businesses, helping to reduce reliance on imported energy.

WILL THE PROPOSED FARM BE VISIBLE?

The planning application will be accompanied by a comprehensive Landscape and Visual Impact Assessment to ensure that any impacts are reduced through appropriate mitigation measures, which will include a robust landscape planting scheme. The site benefits from existing tree and hedge-lined boundaries which will be retained and supplemented by additional planting to assist in screening and filtering views of the development.

WILL ANY EXISTING TREES AND HEDGES BE REMOVED?

The solar panels will fit within existing field boundaries allowing for boundary vegetation to be retained. However, some small sections of hedgerows may need to be removed to allow access, but this will be kept to a minimum and mitigated by additional replacement planting.

HAS FLOOD RISK AND DRAINAGE BEEN CONSIDERED?

Due to the design and construction of solar farms, the extent of additional impermeable areas is kept to a minimum as the solar panels are elevated above ground. Notwithstanding this, a surface water drainage solution will be incorporated into the design proposals to ensure that the proposal does not lead to an increase flood risk. A Flood Risk Assessment will be submitted with the application and discussions will take place with the Environment Agency and the Lead Local Flood Authority.

WILL HERITAGE ASSETS BE IMPACTED?

The Site contains no designated heritage assets. The planning application, however, will be accompanied by a heritage assessment, which will consider local heritage assets such as listed buildings, conservation areas and scheduled monuments. Where necessary mitigation measures will be implemented to minimise adverse impacts.

WILL THE DEVELOPMENT MAKE A NOISE?

PV modules do not make any noise at all. There may be a very low-level noise emitted from the transformers and inverters which would only be audible within the immediate proximity of the components but not outside the development.

WILL THE SITE BE ENCLOSED BY FENCING?

For security purposes there will be a requirement to enclose the solar panels, however, given the rural context, it is proposed to install deer fencing, which comprises of timber posts and wire meshing. Such fencing is designed to ensure most wildlife can continue to travel through and use the site.

HOW WILL THE DEVELOPMENT AFFECT LOCAL WILDLIFE?

Due to the way in which solar arrays are constructed, with minimal intrusion, the existing ground is predominantly unaffected, meaning plants can continue to grow around the panels. Existing trees and hedgerows will be retained, and additional landscaping will be provided which will deliver net gains for local biodiversity. Furthermore, at the end of its 40-year operational life, the equipment will be removed (and recycled) and the site will be restored to its original form.

HOW LONG WILL IT TAKE TO CONSTRUCT?

It is anticipated that the solar farm will take approximately 7 months to construct.

WILL PUBLIC RIGHTS OF WAY BE AFFECTED?

The proposal does not require the stopping or diversion of any public rights of way.

NEXT STEPS AND HAVE YOUR SAY

Enviromena intend to submit a planning application for the proposed solar farm in the coming weeks.

We would like to hear your thoughts on the proposals. You can provide your feedback via the project website: **fillongleysolarfarm.co.uk**, or via the feedback form enclosed. We request that all feedback is received by 30 January 2023.

All comments received will be reviewed and taken into consideration in the final iteration of the design proposals, where feasible to do so. Details of feedback received and how the proposals have been informed will be detailed in a Statement of Community Involvement which will accompany the planning application.

ENVIROMENA

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HAVE YOUR SAY.

Fillongley Solar Farm Feedback Form

All feedback received will be reviewed and taken into consideration in the final iteration of the design proposals, where feasible to do so. Details of feedback received and how the proposals have been informed will be detailed in a Statement of Community Involvement which will accompany the planning application.

We ask that all comments are received by 30th January 2023.

1. ARE YOU RESPONDING TO THIS CONSULTATION AS: (TICK BOX)

- ☐ A local resident
- ☐ A regular visitor
- ☐ A business, club, or organisation (please specify)
- ☐ Other (please specify)

2. DO YOU SUPPORT THE USE OF RENEWABLE ENERGY? (TICK BOX)

- ☐ Yes
- ☐ No
- ☐ No Opinion

3. DO YOU WISH TO EXPAND YOUR RESPONSE?

4. PLEASE TICK THE BOX THAT MOST ACCURATELY REFLECTS YOUR VIEWS (TICK BOX)

- ☐ Fully support Fillongley Solar Farm proposal
- ☐ Broadly support Fillongley Solar Farm proposal
- ☐ Do not support Fillongley Solar Farm proposal
- ☐ Undecided on the proposed solar farm development

5. DO YOU WISH TO EXPAND YOUR RESPONSE?

6. ANY FURTHER COMMENTS ON THE PROPOSED DEVELOPMENT OR THE SITE

If you are completing a hard copy of the form, can you please return it by Monday 30th January 2023 to either:
planningnorthern@bartonwillmore.co.uk
or **Barton Willmore, The Pearl, New Bridge Street, Newcastle, NE1 8AQ**.

ENVIROMENA

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ENVIROMENA

FILLONGLEY SOLAR FARM

A proposed 47.7MW solar farm near Nuneaton, Warwickshire. Enviromena is bringing forward proposals for the development of a solar farm on land near the village of Fillongley which is situated south west of Nuneaton and north west of Coventry. The project will connect to a substation nearby to the development site.

The proposed Fillongley Solar Farm would have a generating capacity of up to 47.7MW of electricity. This is enough to meet the needs of over 17,100 homes every year and save approximately 11,300 tonnes of carbon in emissions.

We would like your views on our proposals prior to submission of a planning application in the coming weeks. We ask that all comments are received by the 30th of January 2023.

ABOUT US

Enviromena is a clean energy solutions company providing safe, affordable, and reliable solutions for growing sustainable power demands.

Headquartered in the UK Enviromena has more than 15 years' global experience in developing, designing, constructing, managing, and operating ground-breaking renewable energy projects.

Enviromena currently manages, operates, and maintains over 700 megawatts (MW) of renewable energy assets including solar and energy storage projects. Our pipeline projects will see this shortly rise to a 1.7 GW generating potential, offsetting the equivalent of almost 1.6 million metric tons of carbon emissions annually.

We are committed to ensuring that we leave the communities and places that we touch in better condition than when we arrived. This begins with constantly evaluating the long-term impacts of that we do. We absolutely prioritise safe working conditions, care for the environment, respect for our employees and the communities we touch.

Enviromena take our responsibility to operate sustainably very seriously because not only because this makes sound commercial sense; it is also a matter of delivering on our duty of care for future generations.

THE SITE

The proposed Fillongley Solar Farm comprises of three land parcels made up of agricultural fields. The site is located near Fillongley, which is south west of Nuneaton and north west Coventry. In total the three land parcels cover an area of approximately 60 ha.

Site Location Plan

THE PROPOSALS

Solar farms use photovoltaic (PV) panels to generate energy from daylight and distribute it through the existing electricity grid to homes and businesses in the local area and nationwide.

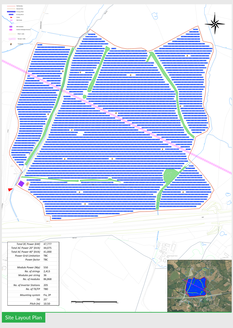
These panels would be mounted on the ground in rows within existing field boundaries ensuring that no hedges or trees need to be removed. The panels would be set at an angle of around 25 degrees, with a maximum height of 3 metres and gaps between the rows. The panels would be surrounded by a light perimeter fence (deer-fencing).

The panels will be supported by associated infrastructure including:

- Inverters: these convert the Direct Current (DC) electricity collected to the Alternating Current (AC) used in electricity distribution / transmission.
- Transformers: these control the voltage of the electricity generated.
- Switchgear: a combination of electrical disconnect switches, fuses or circuit breakers used to control, protect, and isolate electrical equipment.

The site will be protected by CCTV security systems with cameras situated within the site boundaries. There will be no lighting within the site.

Solar farms make minimal noise in operation and will not be audible outside of the development itself. At the end of its 40-year operational life, the equipment will be removed (and recycled) and the entire site will be restored to its original form.



Site Layout Plan

BENEFITS

Net-Zero

The proposed scheme will contribute to the country's growing need for clean electricity generation, making a vital contribution to achieving the Government's commitment to net-zero carbon emissions and making the electricity network completely green by 2035.

At a time when energy security is becoming increasingly important, this project will generate much-needed renewable energy for the local electricity grid. In addition, such green energy projects will help to reduce the cost of rising energy bills currently impacting everyone across the UK.

The scheme will also help North Warwickshire Borough Council achieve their target for the Borough, and wider area, to be net zero carbon by 2050.

The proposals will provide:

47.7MW of generating electricity capacity

Over 17,100 homes powered per year

11,300 tonnes of CO2 saved per year

Generate over £75,000 per year in business rates

Wildlife

The project will deliver net beneficial gains for biodiversity. Solar farm installations have a small footprint on the land they occupy, leaving considerable scope for biodiversity enhancements. Research has shown that responsibly managed solar farms can play an important role in reducing the decline in biodiversity. Existing trees and hedgerows will be retained and protected and supplemented by additional native species planting to support local habitats as part of a wider ecological network.

Local jobs

The development of green energy projects like Fillongley Solar Farm also create business opportunities and economic activity which contribute to the country's green recovery.

We are committed to using local suppliers and contractors during construction and long-term operation of the project , which will benefit the local economy, and provide jobs to people in the local area.

SHARE YOUR VIEWS

Your thoughts, suggestions and ideas are important and will help us shape and ensure the very best scheme is brought forward. Let us know your feedback by completing the questionnaire below.

To give us enough time to review and consider your comments and suggestions, please return them us by no later than Monday 30th January 2023.

1. Are you responding to this consultation as:

- ◯ A local resident
- ◯ A regular visitor
- ◯ A business, club, or organisation (please specify)
- ◯ Other (please specify)

2. Do you support the use of renewable energy?

- ◯ Yes
- ◯ No
- ◯ No Opinion

3. Do you wish to expand your response?

4. Please tick the box that most accurately reflects your views.

- ◯ Fully support Fillongley Solar Farm proposal
- ◯ Broadly support Fillongley Solar Farm proposal
- ◯ Do not support Fillongley Solar Farm proposal
- ◯ Undecided on the proposed solar farm development

5. Do you wish to expand your response?

6. Any further comments on the proposed development or the site?

SUBMIT

Thank you for taking the time to visit our website today. Should you require any of the information from this website in another format or hard copy please do get in touch with us using the details below.

By email

planningnorthern@bartonwillmore.co.uk

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