# Planning Statement

(Incorporating Design and Access Statement and Statement of Community Engagement)

# Development of a solar photo-voltaic installation:

Land off Parsonage Road, SE of Stansted Airport, near Takeley.



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#### 1 Introduction

- 1.1 This planning statement has been prepared in support of an application for the development of land to the south-east of Stansted Airport to the east of Parsonage Road and the south of Hall Road.
- 1.2 The application is made in full and seeks permission to develop the land to accommodate a 14.3 MW solar farm with associated access tracks, landscaping and associated infrastructure such as primary and inverter sub-stations, security fencing and CCTV.
- 1.3 The purpose of this planning statement, which incorporates design and access and community involvement statements, is to detail the application proposals, examine the site context and consider the proposed development against the current planning policy framework. It should be read in conjunction with the following submitted documents and drawings:

#### Planning Documents

- Landscape and Visual Impact Assessment (RPS, May 22)
- Ecological Appraisal Report (RPS, Dec 21)
- Agricultural Land Classification Report (RPS, Sept 21)
- Built Heritage Statement (RPS, April 22)
- Archaeological Desk Based Assessment (RPS, Feb 22)
- Ground Conditions Phase 1 Preliminary Risk Assessment (RPS, April 22)
- Flood Risk Assessment (RPS, Jan 22)
- Construction Traffic Management Plan (RPS, Feb 22)
- Outline Construction Environment Management Plan (RPS, May 22)
- Arboriculture Assessment (RPS, January 22)

#### **Drawings**

- Site Location Plan, Site edged red / land edged blue (drawing STN-PV-001 rev01)
- Scheme layout (drawing ref JPW1799-001 rev G)
- Landscape Strategy Plan (drawing ref 100)

#### Other Supporting Information

- Solar Photovoltaic Viability Assessment (Pager Power, Jan 22)
- Solar Photovoltaic Glint and Glare Study (Pager Power, Jan 22)

# 2 Application Site and Proposed Development, including design and access

#### **Application Site**

- 2.1 The application site (the site) comprises some 22.5 hectares (ha) of land located to the south-east of the Airport. The site is bounded by Parsonage Road to the east, Hall Road to the north and is within a larger area of agricultural land in the Airport's ownership. The land comprises gently sloping open fields interspersed with some hedgerows, ditches and trees. The site and the surrounding fields are wholly owned by Stansted Airport Limited ("STAL") and are currently leased to an agricultural tenant for crop production. Taking account of the need for on-site trackways and landscaping, together with the desire to preserve and enhance existing hedgerows and other habitats on-site, the developable area suitable for solar installation and associated plant is approximately 18ha.
- 2.2 The site boundary is illustrated on the Site Location Plan (drawing STN-PV-001 rev 01).
- 2.3 The site is not environmentally sensitive for the reasons more fully set out in Section X of this report. In particular:
  - The site is not located within a conservation area. Whilst there is a Grade II Listed Building, Le Knells Cottage, on Parsonage Road to the west of the site, this will not be physically impacted by the proposed development or its setting harmed. There are no other heritage assets in the immediate vicinity.
  - The site does not have any statutory or non-statutory ecological or archaeological designations affecting it.
  - The Environment Agency's flood map indicates that the site is located in Flood Zone 1 (i.e. it has low probability of flooding by all sources).
  - In accordance with the national Agricultural Land Classification (ALC) system, the site is a mix of grades, comprising 69% graded as 3a (good quality), 24% grade 3b (moderate quality) and 6% grade 2 (very good quality). The surrounding area is dominated by extensive high-quality grade 3a and grade 2 land.
  - The site is only partially visible from the surrounding area as existing hedgerows and trees around the perimeter provide intermittent screening from the residential and commercial properties on Parsonage Lane and Hall Road and from transitory receptors using those same roads.

- 2.4 The surrounding land uses can be classified as follows:
  - To the north of the site is a children's day nursery and external play area (High House Nursery), an industrial unit with corrugated metal sheds and yard (McMillan's Engineering) and Hall Road. Beyond Hall Road are two residential properties, a small field, a tree belt and an area of hard-standing. Further north lies the boundary of the airport operational area and Terminal Road South, beyond which the area is dominated by airport infrastructure. A narrow strip of woodland extends someway south towards the site but this is outside of the redline boundary as can be seen on drawing number STN-PV-001 rev 01.
  - To the east the site is bounded by a drainage ditch and hedgerow line with two areas of woodland copse and agricultural land beyond.
  - To the south is a further drainage ditch and hedgerow line with agricultural land beyond. Further south is the A120 which adjoins the M11 to the west.
  - To the west the site is contained by more agricultural fields which extend to Parsonage Road, which joins Cooper's End roundabout and Hall Road to the northwest of the site. There are seven residential properties mid-way along Parsonage Road, six on a small cul-de-sac called Cooper's Villas and opposite Le Knell's Cottage. Views into the site from these properties are entirely obscured by existing vegetation. A further property (Stansted Guest House) is located beyond the southwest boundary of the site. Beyond Parsonage Road to the west are further agricultural fields until the wooded course on Pincey Brook is encountered and beyond that airport infrastructure and facilities in the form of mid-stay car parks.
- 2.6 None of the trees within the site are subject to Tree Preservation Orders. There are no public rights of way across or within the site, but the application does include a part of Parsonage Road as the cable connection from the site has to connect to the airport's substation 1 situated on the airport site between Cooper's End Road and Thremhall Avenue.
- 2.7 Access to the Site is from an existing field access gate on Parsonage Road.

#### Proposed Development: Design and Access

2.8 The application is for full permission to develop a solar farm with a total rated capacity of 14.3 MW (Megawatt peak). The facility will provide renewable energy to the airport

- such that when at full output it will meet the airport's current and predicted energy needs in total. The arrangement is such that it will have the capability to provide on-site battery storage so that outside of peak production hours it can store energy to meet peaks in airport energy demands outside of peak production hours.
- 2.9 The proposed development comprises arrays of photo-voltaic (PV) solar panels set out in rows, with a gap of approximately 4m between each row to allow for maintenance and cleaning. The panels (or 'tables') will be set in a fixed orientation the majority facing due south but with some facing east due to glint and glare considerations. The tables will have a maximum height of 3.2m above ground level. The panels will be generally angle at 25 degrees from the horizontal, but some will have that angle increased to 30 degrees, again to take account of glint and glare considerations. The PV panels will be attached to a metal framework which would be supported by either pile driven or screw foundations, or premoulded concrete blocks ('shoes'). Drawing no. JPW1799-001 rev.G shows the proposed general arrangement of the site and Figure 1 below shows the solar module structure and orientation.

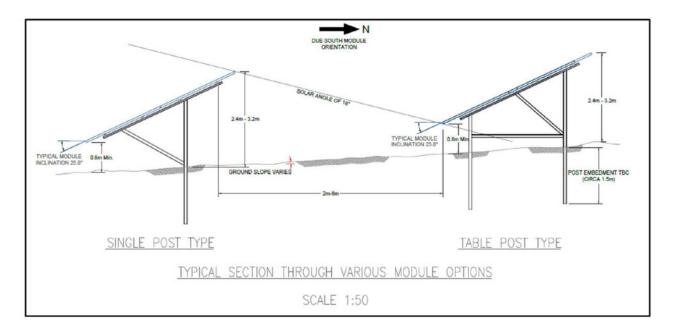


Figure 1: Solar Panel Ground Fixing Options

2.10 The associated infrastructure will include an inverter substation (with approximate dimensions of 6m x 3.2m x 3.4m connecting the PV panels; a centrally located electricity substation building (approximate dimensions 7m x 2.5m x 3m) and battery storage units, the indicative location for which is shown on drawing no. JPW1799-001 rev.G. The site will also include a trackway created with minimal excavation to access the infrastructure,

- together with security fencing, extensive landscape screening, CCTV and motion-activated security lighting.
- 2.11 The point of connection to the airport's own HV electricity network is at 'Substation 100' (a 33 / 11 kV primary substation identified on drawing STN-PV-001 rev 01) which is located between Cooper's End Road and Thremhall Avenue within the airport site. The connection will be made through a single radial circuit from substation 100 to the solar farm; this would be a private cable installed within the verge of existing private highways before crossing Parsonage Road to enter the site from the north-west corner.

#### Landscaping and Biodiversity

- 2.12 As illustrated in Drawing no. 100, the proposal includes various enhancements to the biodiversity of the site. All existing hedgerows and trees will be retained and supplemented where there are gaps. In addition, new hedgerows and trees will be planted on the western boundary of the site and a new hedgerow planted within the site along the line of a former field boundary running through the centre of the site. The existing hedgerow on the southern boundary will be strengthened by infill planting. These measures will help to screen and break up the limited views of the site. There will be a minimum 5m buffer offset from any retained and new planting to ensure a root protection zone is maintained.
- 2.13 In combination, this rich landscape tapestry will enhance both the aesthetics of the site as well as providing a diverse habitat for small birds, reptiles, invertebrates and other flora and fauna in accordance with the airport's own Biodiversity Strategy and Action Plan.

#### **Access Arrangements**

2.14 Vehicular access to the Site is from Parsonage Road utilising an existing established field entrance gate. The installation of internal access tracks will be kept to a minimum as once operational agricultural vehicles such as tractors, quadbikes or four-wheel drive vehicles will be able to conduct the majority of maintenance activities. However, some crushed stone tracks will be required to enable delivery, servicing and replacement of the heavier pieces of infrastructures such as the inverters. These will be located as far as possible to utilise existing field access points throughout the site and be limited to the outer edges of the fields.

#### Drainage

2.15 No formal drainage is proposed as the installation of the solar panels will have no material effect on greenfield run-off rate of the fields into the surrounding water courses. Rain falling

onto the panels will naturally run-off and percolate into the underlying ground. The Environment Agency (EA) surface water flood risk mapping shows the site to be in Flood Zone 1, meaning it has a 'low probability' of fluvial or tidal flooding. The site is also not at any significant risk from surface water flooding with an annual chance of flooding of less than 0.1%. The EA surface water flood risk mapping does identify that one of the watercourses bounding the site does have a pronounced surface water flow path identified with it. Consequently, the PV arrays and any associated infrastructure will be kept out of the surface water flood extents associated with these flow paths and will be set back by at least 8m from them.

#### Boundary Treatment, Lighting and CCTV

- 2.16 Given the site's location and inaccessibility from any public rights of way or highway it is proposed that any security fencing is limited to a high tensile wire deer-proof fence mounted on wooden posts. This perimeter fencing will be 2.4m high. The entrance to the site from the track which will lead to Parsonage Lane will be fitted with a security gate of similar construction and design to the perimeter fencing. These fences would be designed to have small gaps of approximately 10cm at ground level to allow for the continued movement of small mammals, so as not to cut off any foraging routes across the site. The strengthened perimeter landscaping will give additional security to the site.
- 2.17 Security lighting and CCTV will be limited to motion activated units in keeping with its rural setting. Any lighting will be compliant with aerodrome safeguarding criteria and consist of flat cut-off glass luminaries with no light-spill above the horizontal plane.

# 3 Planning History

3.1 Two applications, one adjacent to the site and one incorporating the site, represent the totality of the site's planning history. These are as follows:

UTT/0441/02/FUL – replacement dwelling Tam O'Shanter cottage. This was granted consent, but a subsequent application to renew the consent in 2006 was withdrawn and so the consent lapsed without being implemented.

UTT/0400/08/FUL — The provision of a runway, associated facilities and operational development, in connection with the construction and operation of the expanded airport (including airport buildings, together with ancillary infrastructure and associated operational development) details as schedule. This application was withdrawn four months after it was submitted.

## 4 Planning Policy Context

- 4.1 This section provides a review of the relevant national and local planning policies that apply to the proposed development.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the statutory development plan unless material considerations dictate otherwise.
- 4.3 Uttlesford's Development Plan consists of the Uttlesford Local Plan 2005 (saved policies). Proposals to replace this plan are being brought forward. A previous version of an updated plan was withdrawn in May 2020 after the Local Plan Examination Inspectors expressed: concerns about the number of documents produced by the Council after the plan had been submitted; and, a need for the Council, in consultation with local residents, to make key decisions on the future of Garden Communities and the spatial strategy. The Inspectors considered that the most effective and transparent way to do this would be through the preparation of a new plan rather than emerging as modifications to the submitted plan.
- 4.4 Work has since commenced on the preparation of a new local plan. An "Issues and Options" consultation was undertaken during March and April 2021. At present however, there are no draft policies and so the plan's development carries very little weight in the determination of planning applications.
- 4.5 UDC has also produced a range of supplementary planning documents which can also be material considerations of variable attributable weight including; Energy Efficiency and Renewable Energy (2007), Development Management Policies (2011), Interim Climate Change Planning Policy (2021) and a statement on Solar Farm Development in Uttlesford (2021).
- 4.6 UDC declared a Climate Emergency in 2019 and has pledged to take action to prevent a climate and ecological catastrophe through the development of policies and practices, with an aim to achieving net-zero status by 2030 and to protect and enhance biodiversity within the District.
- 4.7 Following the withdrawal of the Local Plan, UDC adopted an Interim Climate Change Planning Policy to provide a range of up-to-date environmental policies against which to judge planning applications in lieu of the adoption of a new Local Plan. This was not subject to consultation and the weight afforded to it is limited accordingly.

4.8 Guidance contained within the National Planning Policy Framework (NPPF) 2021 and National Planning Policy Guidance (NPPG) as the expression of national planning policy should be taken into account as a material consideration when determining planning applications. Government has also recently consulted on revised National Energy Policy Statements, including one for Renewable Energy Infrastructure but these are subject to an on-going Inquiry by the Commons Select Committee on Business, Energy and Industrial Strategy.

#### National Planning Policy Framework (NPPF)

- 4.9 The National Planning Policy Framework (NPPF) was revised in July 2021 and sets out the Government's planning policies for England and how it expects these to be applied. Fundamental to the NPPF is that the planning system contributes to the achievement of sustainable development. In order to realise this, the planning system is defined as having three mutually dependent objectives that require joint and simultaneous consideration: an economic objective, a social objective and an environmental objective.
- 4.10 The overarching principle of the NPPF is a presumption in favour of sustainable development (paragraph 11) and for decision making purposes this means: "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 protect areas of assets for 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."
- 4.11 Paragraph 152 of the NPPF states: "The planning system should support the transistion to a low carbon future in a changing climate. It should help to: shape palces in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."
- 4.12 Paragraph 158 of the NPPF is perhaps the most pertinent to cite in reference to this planning application. It reads: "When determining planning applications for renewable and low carbon development, local planning authorities should: a) 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 b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas."

#### Decision-making:

4.13 In reference to decision making, the NPPF states that local planning authorities "should approach decisions on proposed development in a positive and creative way" and that "decision-makers at every level should seek to approve applications for sustainable development where possible".

Making effective use of land:

- 4.14 The NPPF requires planning policies and decisions to promote the effective use of land while improving the environment, encourage multiple benefits from the land and take opportunities to achieve net environmental gains such as developments that would enable new habitat creation or improve public access to the countryside (paragraph 119 and 120).
- 4.15 Area-based character assessments should be used to ensure that land is used efficiently, while also creating beautiful and sustainable places (paragraph 124).

Achieving well designed places:

4.16 Good design is cited as a key aspect of sustainable development (paragraph 126). This includes the need to be sympathetic to the local character, surrounding built up environment and landscape setting, the need to be visually attractive and include appropriate and effective landscaping, as well as the need to optimise the potential of the site (paragraph 130).

Meeting the challenge of flooding:

4.17 With regard to flooding, the NPPF requires having due regard to flood risk. Development in areas at risk of flooding is to be avoided (paragraph 159).

#### Conserving and enhancing the natural environment:

4.18 The NPPF requires the protection and enhancement of valued landscapes, recognising the intrinsic character and beauty of the countryside and minimising the impacts on and providing net gains for biodiversity (paragraph 174). New development should be appropriate for its location, taking into account the effects of pollution on health, living conditions and the natural environment, and the potential sensitivity of the site and wider area to impacts that could arise from the development. Potential adverse impacts resulting from noise, lighting and upon tranquillity, recreational and amenity value should be limited and mitigated (paragraph 185).

#### National Planning Practice Guidance

- 4.19 National Planning Practice Guidance (NPPG) is intended to be read alongside the NPPF and provides guidance on key topics such as flood risk. This guidance will also be drawn upon where relevant to this planning application. Dating from 2015, Planning Practice Guidance Renewable and Low Carbon Energy sets out the particular considerations that relate to large-scale ground mounted solar voltaic farms. It recognises that the development of such facilities can have a negative impact on the rural environment in particular settings and land forms. However, it is also clear that the visual impact cen be properly addressed with well-planned and well-screened development layouts.
- 4.20 It goes on to set out the factors that local planning authorities will need to consider in assessing proposals for large-scale ground mounted solar farms including:
  - Encouraging the use of brownfield and non-agricultural land where it is not of high environmental value;
  - Where a proposal involves greenfield land, to consider i) whether the use of agricultural land has been shown to be necessary and poorer quality land has been used on preference to higher quality land and ii) whether the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays;

- That solar farms are normally temporary structures and that planning conditions
  can be used to ensure the installations are removed when no longer required and
  the land restored to its previous use;
- The proposal's visual impact and the effect of glint and glare on surrounding uses and aircraft safety;
- The need for and impact of security measures such as lighting and fencing;
- The need to ensure that heritage assets and their setting are conserved in a manner appropriate to their significance.
- 4.21 It also refers to assessing the cumulative landscape and visual impact of large sale solar farms as being the same as assessing the impact of wind turbines, but goes on to state that it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero.

#### **Energy National Policy Statement**

4.22 In the autumn of 2021, the Government consulted on revised National Policy Statements for Energy including "EN-3 Renewable Energy Infrastructure." In this it reiterated its support for a sustained growth in solar capacity in order to meet net zero emissions targets and as such solar is a key part of the Government's strategy for low-cost decarbonisation of the energy sector. The statement is specifically aimed at nationally significant solar developments of over 50MW but it does prove useful pointers for both site identification criteria and technical issues to consider when considering solar developments. Even for solar developments of this size it does however state that whilst solar developments should prioritise previously developed or poorer quality agricultural land avoiding best and most versatile land where possible, the type of land should not be a predominating factor in the suitability of a site location. It should be for the applicant to explain their choice of site.

#### Local Policy

Appendix 1 transcribes the full policy wording of the policies referenced below.

#### Uttlesford Local Plan (2005)

4.23 As referenced in 4.3 above the development plan for Uttlesford is comprised of saved policies from the 2005 Local Plan accompanied by a number of Supplementary Planning Documents and policy statements. The application site is not currently designated for development in the Uttlesford Local Plan (2005). Figure 2 and 3 below show the sites location and an extract from the Local Plan Proposals Map.



Figure 2: Site Location



Figure 3: Uttlesford DC Local Plan Proposals Map extract

4.24 The airport site is surrounded by a Countryside Protection Zone (CPZ), as designated by Policy S8 of the Uttlesford Local Plan (2005) and highlighted in the figure above. This zone covers around 2,240 hectares with the outer boundary extending approximately 10km north and south east, including the application site and land as far as Takeley in the south. The western boundary is aligned with the M11.

#### 4.25 Policy S8 states:

"The area and boundaries of the Countryside Protection Zone around Stansted Airport are defined on the Proposals Map. In the Countryside Protection Zone planning permission will only be granted for development that is required to be there, or is appropriate to a rural area. There will be strict control on new development. In particular development will not be permitted if either of the following apply:

- a) New buildings or uses would promote coalescence between the airport and existing development in the surrounding countryside;
- b) It would adversely affect the open characteristics of the zone."
- 4.26 As the CPZ is a unique planning designation there is no external guidance on how it should be assessed. Paragraph 2.2.9 of the Local Plan refers to the CPZ as follows:

"The priority within this zone is to maintain a local belt of countryside around the airport that will not be eroded by coalescing developments."

- 4.27 Recent appeal decisions (APP/C1570/W/19/3234530 and APP/C1570/W/19/3234532) in respect of housing developments north of, but attached to, Takeley do examine the effects both on and of the CPZ allocation. Both appeal decisions concluded that the appeal proposals whilst constituting some harm to the CPZ did not undermine its purpose because, *inter alia*, the physical separation afforded by the A120 would prevent any perception of coalescence between the appeal sites and the airport.
- 4.28 The other saved policies that are most pertinent to the consideration of this application are, in no order of priority:
  - GEN2 Design, states that development will not be permitted unless the design meets specific criteria including the minimisation of water and energy consumption.
  - ENV15 Renewable Energy, supports the development of renewable energy schemes to meet local needs and says that proposals will be permitted if they do

- not adversely affect the character of sensitive landscapes, nature conservation interests or residential and recreational amenity.
- ENV5 Protection of Agricultural Land, states that the development of the best and
  most versatile agricultural land will only be permitted where opportunities for
  accommodating the development on previously developed land or within existing
  development limits have been assessed.
- S7 The Countryside, indicates that the countryside will be protected for its own sake and planning permission will only be given for development that needs to take place there or it is appropriate to the rural area. In addition, it will only be permitted if its appearance protects or enhances the particular character of that part of the countryside within which it is set or there are special reasons why the development in the form proposed needs to be there.
- ENV8 Other Landscape elements of Importance for Nature Conservation, indicates that development that affects identified landscape elements, including hedgerows and woodlands, will only be permitted where the need for the development outweighs the need to retain these elements for their importance to wild flora and fauna; and where mitigation measures are provided to compensate for the harm and reinstate the nature conservation value of the locality.
- GEN1 Access, states that planning permission will only be granted where it meets
  five criteria relating to highway safety and capacity, the need of cyclists / pedestrians
  / public transport users / horse riders / and people with mobility impairments and
  encourages movement by means other than driving a car.
- GEN3 Flood Protection, states that proposals on land outside flood risk areas
  must not increase the risk of flooding through increased surface water run-off. A
  flood risk assessment will be required to demonstrate this. Sustainable drainage
  Systems should also be considered as an appropriate flood mitigation measure in
  the first instance.
- GEN4 Good Neighbours, states that proposals for the installation of plant and machinery will not be permitted where they would give rise to material disturbance or nuisance to occupiers of surrounding properties by virtue of noise or vibration, smell, dust, light, fumes or electro-magnetic radiation or exposure to other pollutants.
- GEN7 Nature Conservation, sets out that development that would have a harmful
  effect on wildlife or geological features will not be permitted unless the need for the
  development outweighs the importance of the feature to nature conservation.
   Measures to mitigate and/or compensate the potential impacts of the development

- will be required. The enhancement of biodiversity through the creation of appropriate new habitats will be sought.
- E4 Farm Diversification and Alternative Uses of Farmland, allows for the alternative use of farmland where certain criteria are met. These are: a) the development includes proposals for landscape and nature conservation enhancement; b) the development would not result in a significant increase in the noise levels or other adverse impacts beyond the holding; c) the continued viability and function of the agricultural holding would not be harmed; and d) the development would not place unacceptable pressures on the surrounding rural road network (inn terms of traffic levels, road safety, countryside character and amenity).
- ENV2 Development Affecting Listed Buildings, states that development affecting a listed building should be in keeping with its scale, character and surroundings.
- ENV3 Open Spaces and Trees, indicates that the loss of traditional open spaces, other visually important spaces, groups of trees and fine individual tree specimens through development proposals will not be permitted unless the need for the development outweighs their amenity value.
- ENV4 Ancient Monuments and sites of Archaeological Importance, states that where nationally or locally important archaeological remains are affected by a proposed development their preservation in situ will be the standard presumption.
- ENV7 Protection of the Natural Environment Designated Sites, sets out that development which affects sites of conservation interest will not be permitted unless the benefits of the development can be shown to outweigh the harm.
- ENV14 Contaminated Land, requires that where land is knowingly or strongly suspected to be contaminated and this is causing or may cause significant harm including to controlled waters, a site investigation, a risk assessment and the identification of proposals along with a timetable for remediation are produced.
- AIR1 Development in the Terminal Support Area, land adjoining the terminal, as shown on the Inset Map, is principally reserved for landside road and rail infrastructure and a telecommunications building, airside roads, the apron, passenger vehicle station rapid transport system and other airside operational uses; terminal support offices; an hotel and associated parking; a bus and coach station and short term and staff car parks.
- AIR2 Cargo Handling / Aircraft Maintenance Area, the area shown on the Inset Map as the cargo handling/aircraft maintenance area is principally reserved for the repair, overhaul, maintenance and refurbishment of aircraft, and facilities

- associated with the transfer of freight between road vehicles and aircraft or between aircraft.
- AIR3 Development in the Southern Ancillary Area, the area of land identified on the Inset Map as the southern ancillary area will be principally reserved for activities directly related to, or associated with the Airport, such as car hire, parking, maintenance and valeting operations; flight catering units; offices for various support functions, freight forwarders and agents; support functions for aircraft maintenance which can be carried out remote from an aircraft being serviced; airline training centres; airline computer centres and equipment storage facilities for airlines. Development will take place in phases based on a broad design brief agreed with the Council.
- AIR6 Strategic Landscape Areas, development will not be permitted within those areas identified as strategic landscape areas on the Inset Map.

Energy Efficiency and Renewable Energy Supplementary Planning Document 2007

- 4.29 The Energy Efficiency SPD provides guidance to applicants on the measures they can include in new development to reduce energy use. It supports Polices GEN2 and ENV15 of the Local Plan. At paragraph 2.7 a hierarchy is set out to advise on the ways in which energy use can be reduced. 'Hierarchy 3' specifies that developers should use renewable energy and switch to less damaging low-carbon energy sources, for example solar and wind power.
- 4.30 Uttlesford Guidance 4 encourages developers to provide at least 10% of the predicted energy requirements for new developments from on-site renewables or low carbon energy sources in all developments over 1,000 sq.metres. This guidance is not otherwise directed at the development of solar farms as proposed by this application.

Highway Development Management Policies 2011

4.31 This document seeks to inter alia protect and maintain a safe and reliable highway infrastructure and address the impacts of commercial vehicles on the highway network and communities. The following policies will be considered against this application namely: DM1- General, DM7 – Application of Design Standards, DM12 – Rural Diversification, DM13 – Transport Assessments, DM14 – Safety Audit, DM16 Air Quality, DM19 – HGV Movements and DM20 – Construction Management. All matters pertaining to these policies are picked up in the Planning Appraisal later in this document and the accompanying Construction Traffic Management Plan.

#### Interim Climate Change Planning Policy 2021

- 4.32 Following on from UDC's declaration of a climate and ecological emergency, and the withdrawal of the Regulation 19 Plan, it produced an interim policy document to set out how it intends to judge whether or not development proposals adequately mitigate and adapt to climate change pending the adoption of the replacement Local Plan.
- 4.33 The policies are not aimed at development proposals for renewable energy infrastructure, but at how proposals for other types of development should address and mitigate for climate change and bio-diversity loss. Interim Policy 1 requires developers to demonstrate the path their proposals take towards achieving net-zero carbon emissions including the promotion of development which minimises carbon and greenhouse gas emissions and maximises the use of renewable or low carbon energy sources.

#### Guidance on Applications for Solar Farm Developments in Uttlesford 2021

4.34 This essentially restates National Policy will apply to the consideration of applications for solar farms but that the Council recognises that there are local issues regarding cumulative visual impact and the loss of the best and most valuable agricultural land that need to be considered. However, until a policy appears in a new Local Plan these will have to be balanced out against the other factors set out in national policy.

#### Takeley Neighbourhood Plan

4.35 The application site sits within the area designated in September 2021as the Neighbourhood Development Plan Area for Takeley. This plan is being prepared by Takeley Parish Council and its residents to establish a vision for the long-term development and sustainability of the area and to set out planning policies that will be used to determine planning applications locally. To date however, no documents have been produced for consultation purposes.

#### Stansted Airport Sustainable Development Plan (2015)

4.36 Whilst not part of the formal development, Government guidance on the production of airport master plans is clear that they should be used to inform the development plan process. Stansted's current sustainable development plan (SDP) was subject to extensive public engagement and was adopted in 2015. The SDP consists of a suite of documents that sets out our development aspirations to grow the business, to maximise the economic benefit that growth can deliver, that sets out how we will interact with, engage with and

- spread the benefits to our local communities and sets out how we will manage, mitigate and reduce our environmental impacts. This last aspect is covered in the Environment Plan.
- 4.37 The Environment Plan explores how the airport is adapting to climate change in particular how it goes about reducing carbon emissions from its own operations as an operator of the airport infrastructure as opposed to the Aviation sector as a whole, which is subject to International Agreements. The approach to reducing carbon emissions from the airport's own operations is to:
  - reduce the overall demand for energy through energy efficiency measures and controls and by engaging staff and other airport companies in these initiatives;
  - invest in low energy and low carbon technology such as low-energy lighting and fuel-efficient vehicles, and where possible meet remaining energy requirements through renewable or low carbon energy technologies such as solar power or biomass; and
  - monitor and measure energy performance, targeting areas of high consumption or emissions.
- 4.38 Stansted is a large consumer of energy. The majority of this is electricity (87%) which remains the priority for reduction measures. The energy reduction programme has seen demand reducing but there is still more to do. The airport is committed to taking advantage of opportunities for implementing new more energy efficient and low carbon technologies and controls. The reductions that have been achieved to date are the result of a sustained effort to challenge energy use in all parts the airport's operations and focus on areas of high consumption. This programme has included measures to improve the way buildings and infrastructure are used, so that unnecessary plant and equipment is switched off whenever it is not needed. Substantial investments have been made in modern, low-energy plant and equipment, in particular: modifying air handling units; chilling plant; and introducing low-energy lighting.
- 4.39 Although the airport has made significant progress in reducing energy consumption, it is important that it makes use of energy from renewable sources where it is practical to do so. In 2014 the airport switched its electricity supply to a 'green energy' tariff. Now all of the electricity that is purchase for use at Stansted is generated from renewable sources and exempt from the Government's climate change levy. The airport's work in this area has been recognised by the Carbon Trust and it has held their carbon-neutral standard since 2010.

4.40 The airport has long recognised that there are opportunities on and around the airport site where it could take this further and look to generate its own renewable energy sources. The SDP is clear that this is something that it would look to do and this application is a manifestation of that commitment.

#### MAG Corporate Social Responsibility (CSR) Strategy 2020

4.41 MAG's CSR Strategy sets out how the Group will develop and improve its business for the benefits of the communities, regions and environment around its airports. The Plan of Action on page 12 of the document states:

"Improving the global environment by cutting any remaining reliance on fossil fuels, whilst working alongside our partners to reduce the waste and emissions from activities related to our operation."

"Aviation is one of the most challenging industries to decarbonise, with low carbon technology for flights, especially long-haul flights, still some way off. The UK aviation industry has a plan to reach net zero carbon by 2050, achievable through operational improvements and airspace modernisation, exciting new technologies, sustainable aviation fuels, and carbon removal projects."

The carbon footprint of an airport itself is relatively small (when set against the emissions generated by flights themselves) but still significant and MAG is proud that all of its airports are now carbon neutral. This has been achieved through our long-term focus on the energy efficiency of our buildings, the purchase of low carbon electricity, and addressing residual emissions through high quality 'Gold Standard' carbon offsets.

We know that we need to do more in the future. Our headline commitment is to achieve 'net zero carbon' by 2038 at the latest by cutting our remaining carbon emissions to zero and reducing the number of carbon offsets we require. It will require significant planning, investment and technical work but it is important that we play our part."

### 5 Rationale and Alternatives

#### Rationale

- 5.1 STAL is fully committed to operating and growing Stansted Airport in a responsible and sustainable way. Decarbonisation is one of its key priorities. STAL is proud to already be carbon neutral but has an even more ambitious target to remove residual emissions and reach Net Zero carbon emissions from its airport operations no later than 2038. This will see STAL achieve Net Zero carbon significantly ahead of the 2050 national target legislated by Government. Its plan to reach zero carbon status is one of the strategic priorities that underpins the MAG/STAL 2020 Corporate Social Responsibility Strategy.
- 5.2 Stansted Airport is a large consumer of energy, the majority of which is electricity. This is therefore a priority for reduction measures. In recent years it has made considerable progress with this; having upgraded lighting, heating, cooling and ventilation systems as well as implementing efficient controls for passenger equipment such as lifts and escalators. 100% of the electricity that is currently used to power all of the Airport's infrastructure is from renewable sources. But there is still more that can be done. Whilst STAL will continue to drive ever greater energy efficiency, it needs to explore options for developing its own renewable energy sources both on-site and on land within its ownership. There is significant potential to achieve this utilising solar energy, which the proposed scheme seeks to realise. STAL already uses renewable electricity to power the Airport, however having the means to self-generate this will increase its resilience and make for a more secure energy supply. This is extremely important as without energy security there lies the potential for Airport operations to be adversely affected. Generating its own renewable energy will also allow a significant amount of renewably sourced energy back onto the market.

#### **Alternatives**

5.3 Stansted Airport covers 957 hectares and comprises a mixture of: its airfield with runway and associated infrastructure; the Terminal zone comprising the main passenger focussed activity; the Cargo zone including aircraft maintenance and the air traffic control tower; North-side including significant areas of aircraft parking, general aviation facilities and the main long-stay car parking area for the airport; and, South-gate incorporating a hotel, road-side facilities and further surface car-parking. In addition to this STAL owns some 178 hectares of agricultural land concentrated into three main parcels, one described as Higher House farm incorporating the application site, one referred to as Grange Farm between

Bamber's Green and Molehill Green and a third parcel between Molehill Green and Gaunt's End also incorporating East End Wood Site of Special Scientific Importance (SSSI).



Figure 4 Stansted controlled buildings and Agricultural Estate

- 5.4 The site for a solar farm to serve the airport directly ideally needs to be:
  - proximate to a connection point to the airport's HV electricity network,
  - in a location that does not compromise the safe operation of the airport,
  - that has certainty of tenure for a period of at least 25 years, and
  - preferably consist of a single site rather than a collection of smaller sites in order
    to derive the commercial and operational efficiencies that a single site brings.
    The connection point to the airport's high voltage network is at sub-station 100
    (illustrated by the green cross of Figure 4 above) to the south-west of Cooper's
    End Roundabout on land between Cooper's End Road and Thremhall Avenue.
- 5.5 Sites for solar installations on land (or buildings) in close proximity to operational airports need careful consideration. Stansted Airport is an officially safeguarded civil aerodrome and development in its vicinity is directed by the Town and Country Planning (Safeguarded

Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 and also has to have regard to the Air Navigation Order 2016, particularly paragraph 240 which states that "A person must not recklessly or negligently act in a manner likely to endanger an aircraft, or any person in an aircraft." A careful assessment of any likely effects of the development that could affect the safe operation of the airport and its runways is therefore essential and this assessment has influenced the choice of the application site.

- 5.6 The primary impact to be considered is whether or not the installation would generate any 'glint and glare' issues. Glint, a momentary flash of bright light typically received by moving receptors or from moving reflectors, and glare, a continuous source of bright light received by static receptors from large reflective surfaces, have the ability to impact aircraft on approach to both runway ends and to impact on views from the air traffic control tower.
- 5.7 Included within this submission is a glint and glare assessment of the proposal. This assessment was used to ensure that the proposal did not give rise to any negative effects on the air traffic control tower or on aircraft on approach to the airport. This is the reason for the different orientation of the panels on the northernmost portion of the proposal, to remove the potential to create glare that would create a negative ocular impact on air traffic controllers in the control tower.
- 5.8 A further assessment paper (Solar Photovoltaic Viability Assessment, Pager Power) is included with this submission. This looks at the constraints that placing a solar installation on airfield land would face. Runways have an assortment of 'protected surfaces' that limit the heights and types of structures and development in proximity to the runway. There are also runway and taxiway clear zones that need to be kept free of all but essential equipment. Coupled with these protected surfaces and clear zones is the likely effect of 'jet-blast' from aircraft manoeuvring around the airfield and runways which would place an undue stress on the fixings for any solar panels and increase the risk of these becoming loose and breaking free which in turn would create a further hazard by potentially having large pieces of debris blown around by aircraft jet-blast representing a danger not just to aircraft but to the public at large.
- 5.9 Other areas that have been considered include the rest of the Stansted agricultural portfolio, but these locations were discounted on account of having greater potential to create issues with glint and glare because of their location and orientation in regard to the runway and control tower and being too remote from the connection point to the HV network. The large surface car parks to the south-west of the airport were similarly discounted for these same reasons.

- 5.10 The mid-stay car park which is accessed immediately off the A120 on the eastern section of the main airport campus does offer some potential given its proximity to the connection point to the HV network and the reduced effects of glint and glare, but its layout is bisected by mature and biodiversity rich hedgerow and planting areas. Balancing the overall coverage of solar panels to achieve viable generation levels whilst maintaining biodiversity and parking operations was not deemed possible.
- 5.11 In terms of building roofs as an alternative, it should be noted that Stansted Airport exercises direct control of very few buildings on-site, with the majority in third party control either freehold or on long leases. Of those that are in our direct control, and which offer structurally feasible options, do not provide the cumulative area to allow for the generation capacity required. To achieve any critical mass, the largest of the buildings in STAL's ownership, the terminal building, would be required. However, this building has a lightweight feature tensile roof and is incapable of load bearing to support a solar array on it. Given such fundamental unsuitability of roof options, a glint and glare assessment of these roof structures has not been undertaken but given their orientation in relation to the control tower it is clear that glare would be a potential issue.
- 5.12 Given the above considerations the site which is the subject of this proposal is the only one that is the only one that:
  - can accommodate a solar facility that would not compromise the safe operation of the airport,
  - does not unduly disturb rich existing site biodiversity,
  - has a certainty of tenure commensurate with the anticipated life-span of the facility,
  - is capable of being accommodated on a single site with all the operational benefits that derive from that and,
  - is in a location that affords an efficient connection to the airport's high voltage network with minimum disruption to both the airport's operation and to the functioning of the highway network in and around the airport.

## 6 Planning Appraisal

- 6.1 The approach to considering the merits of any planning application is provided for and required by Section 70(2) of the Town and Country Planning Act and Section 38(6) of the Planning and Compulsory Purchase Act 2004. These pieces of legislation state that for the purpose of determining a planning application, the determination must be made in accordance with the development plan unless material considerations indicate otherwise. The plan-led system for the determination of a planning application is a central tenet of the NPPF.
- 6.2 This section of the Planning Statement therefore examines the extent to which the proposed development is supported by the policies in the development plan. Having regard to these, and other relevant material considerations, the key planning issues arising from the application, and discussed below are:
  - The principle of development
  - Design
  - Landscape and visual impact
  - Drainage, flood risk and water resources
  - Solar glint and glare and aircraft safety
  - Biodiversity and ecological impact
  - Air quality
  - Noise and vibration
  - Ground conditions and contamination
  - Agricultural land
  - Built heritage and archaeology
  - Transport and access/ traffic impact
  - Waste management
  - Construction management
  - Climate change
  - Residential amenity

#### Principle of Development and Siting

6.3 The revised National Policy Framework (NPPF) was published in July 2021. It is the document that sets out the Government's overarching planning policies for England and sets out how they are expected to be applied. The central principle of the NPPF is that there is a clear presumption in favour of sustainable development, and there is an expectation

- for local authorities to plan positively for the achievement of high quality and inclusive design for all development.
- 6.4 NPPF states that the planning system should support the transition to a low carbon future in a changing climate and support renewable and low carbon energy and associated infrastructure (paragraph 152). It goes on to say that plans should provide a positive strategy for energy from renewable sources, that maximises the potential for suitable development, while ensuring the adverse effects are addressed satisfactorily including any cumulative landscape and visual impacts (paragraph 155).
- 6.5 Further it goes on to say that when determining applications for renewable energy and low carbon development, applicants should not be required to demonstrate the overall need for renewable and low carbon energy, and it should be recognised that they play a valuable contribution to cutting greenhouse gas emissions. Planning applications should be approved if their impacts are, or can be made, acceptable (paragraph 158). The National Planning Policy Guidance goes on to further explain how these impacts can be mitigated in respect of solar farms. The visual impact of an installation can be mitigated through a well-planned and well screened development and that the impact on agricultural land can be mitigated by retaining an agricultural use during the lifetime of the installation. Further it is recognised that solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use (paragraph:013 Ref ID:5-013-20150327).
- 6.6 The application site is adjacent to Stansted Airport. Uttlesford Local Plan saved policies AIR1 3 and 6 place both expectations and restrictions on the types of development that may be contained within them. It is for these reasons that it has been necessary to look to Stansted Airport's wider estate to find a site of sufficient size to accommodate an installation capable of meeting the airport's energy needs.
- 6.7 The application site sits within the area designated by Policy S8 Countryside Protection Zone (CPZ), a specific allocation applying to the countryside around Stansted Airport. As well as the restrictions set out in S7 this policy states that development will not be permitted if:
  - "a) New buildings or uses would promote coalescence between the airport and existing development in the surrounding countryside; [...]
  - c) It would adversely affect the open characteristics of the zone."

- 6.8 As the CPZ is a unique planning is a unique planning designation the is no external guidance on development in this location. The Landscape and Visual Impact Assessment and the Landscape Strategy set out below, demonstrate how the proposal is relatively self-contained and how this influences how it should be assessed in the context of the wider CPZ. Paragraph 2.2.9 of the Local Plan refers to the CPZ as follows: "The priority within this belt is to maintain a local belt of countryside around the airport that will not be eroded by coalescing developments." As the proposed solar farm is in a self-contained location and does not involve any permanent new buildings or tall structures it would not lead to the coalescence with any existing developments nor to an erosion of the open nature of the CPZ. As such the proposed development is entirely consistent with this policy and represents appropriate development in this location. The Landscape and Visual Impact Assessment and the Landscape Strategy set out below, demonstrate how the proposal is relatively self-contained within the landscape and how the proposal will, through extensive additional landscaping, further reinforce this.
- 6.9 The construction of a solar array to support the energy needs of Stansted Airport needs to be co-located with the airport to provide optimum connectivity to the airport's High Voltage private network. Such a proposal requires a large site to accommodate the 14MW generating capacity required of such a facility to provide for the airport's current and projected energy consumption requirements. It has been shown that for reasons of aircraft safety or for to accommodate the future development requirements of the airport that it has not been possible to identify a site (or sites) of sufficient size within the airport's built-development confines. Consequently, the adjoining rural agricultural estate has been identified to accommodate such a facility.
- 6.10 Policy S7 supports development that is appropriate, or that needs to be in a rural area provided in protects or enhances the particular character of the area of countryside within which it is set. It is considered that the development is both appropriate for and required to be in a rural location. Policy S8 provides a further unique designation to the countryside in the immediate vicinity of the airport. This further restricts development to that which is required to be there or is appropriate to a rural area to prevent coalescence between the airport and existing development or that would adversely affect the open nature of the zone. As demonstrated in 6.8 above these tests have been met because of the non-coalescing nature of the development and the proposed landscaping treatment providing a positive enhancement rather than an adverse effect.
- 6.11 Policy ENV15 and The Interim Climate Change Planning Policy and the Guidance for Planning Applications for Solar Farm in Uttlesford District further support the application. This proposal has the specific purpose of supporting the adjoining Stansted Airport where the ability to have access to a clean and renewable source of energy will support the

- airport's ability to achieve a net-zero carbon operational environment. The relationship with the airport is the specific reason why this development is being brought forward in this location.
- 6.12 The need to combat climate change and the related decarbonisation of the nation's electricity generation infrastructure are key considerations to which great weight should be afforded. The importance of these considerations is reflected in the presumption in favour of such development where its impacts either are or can be made acceptable. We do not consider that there are any unacceptable impacts arising from these proposals (which we assess below) and consequently the presumption in favour of the development applies.

#### Impact on Landscape Character

6.13 A 'high-level' Landscape and Visual Assessment has been undertaken and is a supporting document to this application, a summary of which is provided below. This assessment has considered the site within the local policy context, informed by a brief overview of the baseline site conditions, potential mitigation measures and the likely visual effects from construction and operation of the proposed development from a desk-based review and site visit. A map of the planning landscape designations is provided at Figure 5 below.

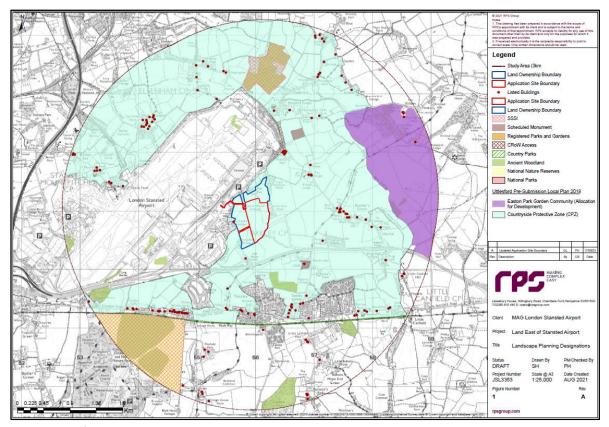


Figure 5 Landscape Designations

- 6.14 As described above, Policy S8 of the UDC Local Plan (adopted 2005) identifies the site as coming within the CPZ which surrounds Stansted Airport – an area designated to protect the open characteristics of the countryside around the airport and to prevent coalescing of development.
- 6.15 Given that the proposed development will be integrated within the landscape rather than acting to urbanise it and that it is 'reversable', it would not act to promote coalescence between the airport and existing development or adversely affect the open characteristics of the CPZ. The nearest development is, aside from isolated residential and commercial properties, the village of Takeley. The site sits almost 1km from the northernmost outskirts of the village and is separated from it by the A120 which sits in cutting with heavily landscaped bunding providing a strong visual separation between the application site and the village. The development would therefore not conflict with the aims of this policy.
- 6.16 An initial Zone of Theoretical Visibility (ZTV), which accounts for the screening effects of surrounding buildings and current vegetation, has been prepared using the viewpoints listed in the Table 1 below. This is based on the solar panels having a maximum height of 3.2m above existing ground levels.

Viewpoint number	Location	NGR
1	Parsonage Road (Just north of A120 flyover)	555904, 222141
2	Parsonage Road (Roadside Footpath looking north)	555757, 222356 (est.)
3	Parsonage Road (Roadside Footpath alongside Le Knells Cottage)	555628, 222808
4	Roundabout at exit from Stansted Airport	555599, 223170
5	Parsonage Road (Looking South)	556115, 223523
6	Public Right of Way (east of Little Newlands Wood)	556595, 223480
7	Minor Road NW of Smiths Green	557200, 223258
8	Harcamlow Way (Just north of A120 flyover)	556972, 222392
9	Public Footpath (South of A120 looking north)	556420, 222228

Table 1: Selected Viewpoints informing ZTV

6.17 As shown in Figure 3.2 below, the ZTV indicates that views to the north and east would largely be contained; however, there is greater inter-visibility to the south.

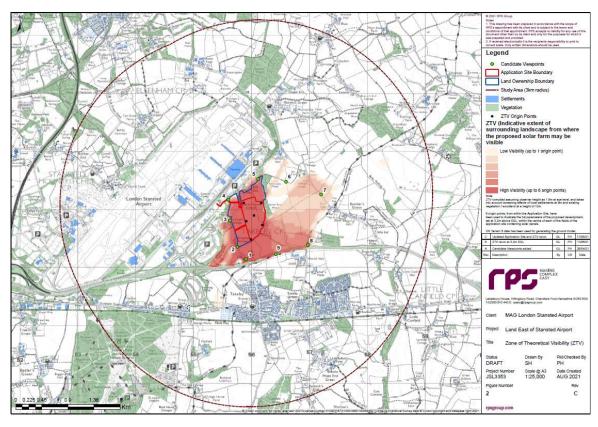


Figure 6: Zone of Theoretical Visibility (ZTV)

- 6.18 It is proposed that the planting of trees and hedgerows will take place along the western and southern edges of the proposed solar farm and that the historic field boundary in the centre of the site will be re-established with and delineated by a new hedgerow. These landscape interventions will help to screen, or at least significantly reduce, direct views of the proposed development. The planting will be orientated and landscaped so as to ensure that the trees do not significantly overshadow any PV panels, as this could adversely affect their generation capacity and performance.
- 6.19 Landscape and visual effects during the construction phase are anticipated to be short-term, temporary and non-significant. During the operational phase, the effects would be long term, but not permanent due to the approximate 25 year expected life of the facility. Some minor adverse effects are expected; however, these would not be significant and would reduce with time and distance from the site as the proposed landscaping buffer becomes more established, helping to shield the development and thereby mitigate the visual and landscape effects.

#### Summary

6.20 Any Landscape and Visual effects of the proposed development can be effectively mitigated by enhanced landscaping which will screen the solar farm from nearby receptors.

#### Agricultural Land

6.21 As mentioned earlier in this report, in accordance with the national Agricultural Land Classification (ALC) system, the majority of the site (69%) is graded as 3a (good quality), with approximately 24% grade 3b (moderate quality) and 6% grade 2 (very good quality). This is shown in Figure 7 below. The surrounding area is dominated by high quality Grade 3a and Grade 2 land.

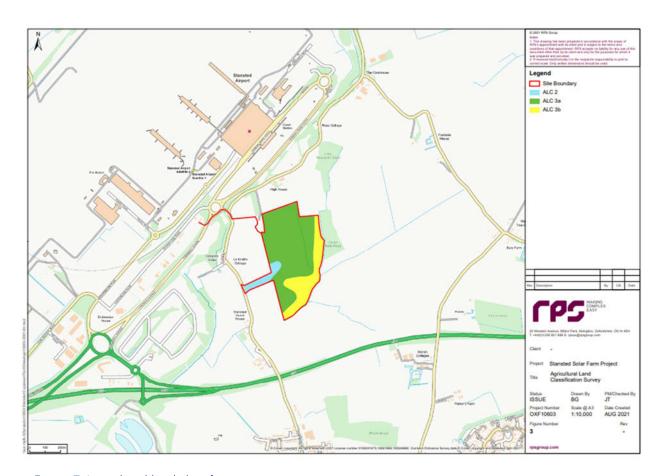


Figure 7 Agricultural land classification.

6.22 The site is included in a reconnaissance soil map produced in 1969 by the Soil Survey of England and Wales (Sheet 148, Saffron Walden) that records broad groupings of soils called Soil Associations. These are closely linked to the geological parent material which, for the site and wider area, is Chalky Boulder Clay. The soils on the site fall within the Hanslope Association (Association 6) which are characterised as imperfectly drained, calcareous, clayey soil.

- 6.23 The site was surveyed in detail in 2007 by RPS in connection with the Stansted G2 project. The survey included the examination of hand auger borings at a density of 1 per ha together with soil pits examined to confirm the soil characteristics identified through the auger boring survey. This survey found that the overriding limitation on the quality of the agricultural land is the susceptibility to soil wetness. The degree to which this limits the agricultural land quality within the survey area depends on the combination of:
  - the topsoil texture of the soil profile, typically heavy clay loam or clay;
  - the presence and depth of gleying within the soil profile;
  - the depth within the soil profile to the slowly permeable layer (SPL). This is a poorly structured horizon that inhibits the movement of water through the soil profile; and
  - the degree to which the soil profile is calcareous.
- 6.24 Therefore, whilst the site represents 'best and most versatile' (BMV) agricultural land, the majority of the land falls within the lower categories of Subgrade 3a (good quality) and 3b (moderate quality). Subgrade 3a, 3b and Grade 2 land dominates this area, as it does across large swathes of Eastern England.
- 6.25 The land within the site is currently being farmed by G A Coleman and Partners for crop production, on a short-term farm business tenancy. GA Coleman and Partners is a large arable based farming enterprise with over 200ha and therefore the viability of this business would not be jeopardised by the loss of the land required for the solar farm. Moreover, the fields surrounding the site which are also owned by STAL will be kept in agricultural use throughout the lifetime of the solar farm. In addition, options for sheep grazing or some other compatible agricultural use within the solar farm site will also be pursued during the lifetime of the solar farm.
- 6.26 The use of this land for this solar farm project would not, in any event, lead to the permanent loss of the agricultural quality of the land, which could be reinstated to its former use following decommissioning.

#### Summary

6.27 In view of the above, the proposed solar farm would not have a significant effect on agriculture. It would occupy a relatively modest area of typical boulder clay soils which would not affect agricultural productivity or the viability of individual farm holdings. The land could be returned to its former use following decommissioning. As such, it would not lead to any permanent losses of the best and most versatile land. Further details are available in the accompanying Agricultural Land Classification Report. The proposal would therefore conform to Policy ENV5 of the Local Plan and the Guidance for Planning

Applications for Solar Farms in Uttlesford District in that it has been demonstrated that alternative locations not requiring agricultural land were not available and that the development would not result in the permanent loss of agricultural land.

#### Transport and Access

- 6.28 Paragraph 11 of the NPPF states that requirement for a Traffic Impact Assessment should only be necessary where the effects of a development can be shown to have a significant impact on the highway network. "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe." Through discussion with the Highway Authority during and subsequent to the Environmental Impact Assessment screening exercise, it has been agreed that a Traffic Impact Assessment would not be required subject to a Construction Traffic Management Plan being agreed and confirmation that existing roads and the development access can be safely accessed by HGVs.
- 6.29 The construction of the solar farm, assuming an installed capacity of 14.3MW will require approximately 130 to 140 standard shipping containers to transport the manufactured PV panels to the site. In addition, there will be a similar number of HGV movements needed to transport the metal frames and other plant to the site. Therefore, the total number of HGV movements during the construction programme will be between 260 and 280.
- 6.30 The typical build programme for the proposal will be between 30 40 weeks, meaning that HGV movements throughout each day will be relatively infrequent. Based on the shorter construction programme of 30 weeks (6 days Mon Sat) the site would be accessed by 1.6 HGV movements a day spread evenly over the construction period. On this basis it will be easy to schedule HGV deliveries to avoid peak or sensitive periods on the road network. In addition, the site will also need to be accessed by construction workers to carry out the installation. The on-site contractors would typically access the site in light goods vehicles such as small or medium sized vans. It is anticipated that theses would account for 3 4 LGV movements per day. Once operational the site will only require occasional access for maintenance activity such as panel cleaning or routine checks.
- 6.31 Deliveries to the site during the construction phase will be managed through the Construction Traffic Management Plan, which accompanies the application. This aim of this is to specify access routes (direct access to be from the A120 through the airport internal road network and onto Parsonage Lane thereby avoiding any movements through Takeley), keep construction vehicle and workforce movements outside of peak travel times,

to minimise the potential impact that could be experienced on the local road network, including Parsonage Road.

#### Summary

6.32 The development does not generate vehicle movements during the course of its operation other than occasional maintenance visits. During the construction programme all impacts are minimal and capable of being controlled through a Construction Traffic Management Plan so the proposal does not give rise to any significant impact on the highway network and is compatible with Local Plan Policy GEN1, Policy E4 and with the Essex Highway Development Management Policies. Temporary works to improve HGV access into the site are set out in the Construction Traffic Management Plan but these will revert to the existing access arrangement which is suitable for lighter vehicles required for maintenance once construction is completed and reinstatement of vegetation carried out.

#### **Built Heritage**

- 6.33 The NPPF seeks to conserve heritage assets in a manner appropriate to their significance. Applicant for planning permission should describe the significance of any heritage assets affected, including any contribution made to its setting. A Built Heritage Assessment is submitted with the application.
- 6.34 The site is not located within or near a Conservation Area; however, there is one Grade II listed building Le Knells Cottage, located to the west on Parsonage Road and a further Grade II listed building Old House Farmhouse, located approximately 220m to the south. Within a 1.5km radius of the site, there are a total of 19 Grade II listed buildings and two Grade I listed buildings, the Church of the Holy Trinity and Warish Hall and Moat Bridge.
- 6.34 There are two Scheduled Ancient Monuments in the vicinity of the application site The Grange and the site of Waltham Hall are located to the north-east of the site. The Grange is approximately 600m from the site whilst Waltham Hall is approximately 300m further north on Waltham Hall Road.
- 6.35 Due to the geographic distance and visual separation of the proposed development to these designated heritage assets, it is unlikely that there will be any effect on their physical integrity or setting. Whilst a number of additional listed buildings and conservation areas are located within 1.5km of the site, the majority are considered to be sufficiently well concealed from the site (by intervening roads, buildings and vegetation) such that they would not experience any noticeable effects. This includes the two Scheduled Ancient Monuments referred to above which are visually screened from the site by two dense woodland tree belts.

- 6.36 With respect to the closest heritage asset, Le Knells Cottage, this property is largely screened by trees as shown in the aerial photo in Figure 8 below. It is therefore not expected that this property would have a clear line of sight of the solar farm.
- 6.37 Indirect effects on the setting of such assets are also considered unlikely due to the limited traffic, emissions and noise associated with the construction and operation of a solar farm. Designated routes for construction traffic contained within the construction traffic management plan will ensure that HGVs are directed away from these sensitive receptors, wherever practicable.

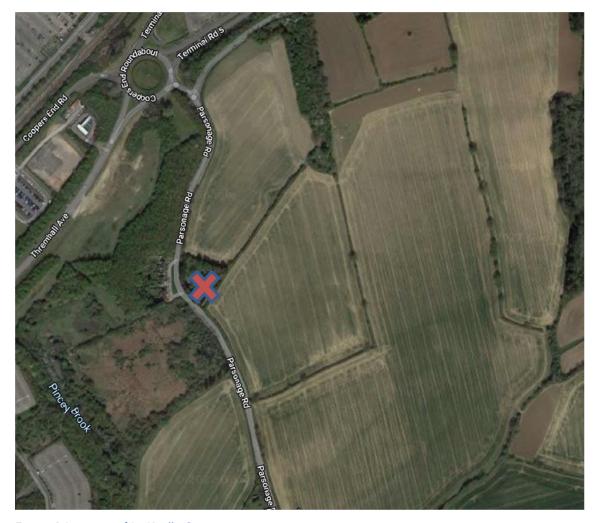


Figure 8 Location of Le Knells Cottage

6.38 In view of the above, it is considered that the proposed development is unlikely to have any significant adverse effects on built heritage assets or their setting which could not be

adequately mitigated. Such mitigation could be secured through condition, if desired. The development therefore meets the tests of Local Plan Policy ENV2.

### Archaeology

6.39 An archaeological and cultural heritage desk-based assessment (DBA) has been completed and accompanies the planning application. A summary of this DBA is provided below in Table 2.

Period:	Identified Archaeological Potential and Significance:
Prehistoric	High potential for Late Bronze Age, Iron Age and Late Iron Age - Early Romano-British archaeology as recorded in evaluation works on the site. These potential archaeological remains would appear to have the potential to vary in significance from Medium to Low significance.
Roman	High potential for Late Iron Age - Early Romano-British archaeology as recorded in evaluation works on the site and the site to the east - MEX1049866. These potential archaeological remains would appear to have the potential to vary in significance from Medium to Low significance.
Anglo-Saxon	Low potential. Very little Saxon archaeology recorded on the HER data and none referred to from the site evaluation. If Saxon archaeology was recorded on the site, it could be of Medium significance.
Medieval	Low to Medium potential. The HER data provides significant information regarding the medieval landscape surrounding the site with the recording of moated sites, houses, pottery scatters and other elements of medieval archaeology. No medieval archaeological remains are recorded on the site in the HER data. If medieval archaeology was recorded on the site, it is likely to be of Low to Medium significance.
Post Medieval	High potential for post-medieval field boundaries. The location of the windmills recorded on the early mapping (see above) appears to be treated with some scepticism in the HER data. If post- medieval archaeology was recorded on the site, it is likely to be of Low significance.
Modern	Low potential.

Table 2 Summary of Archaeological Desk Based Assessment

- 6.40 The majority of the site has been subject to previous archaeology evaluation works, comprising an extensive series trial trenches completed in 2006/7 in association with the 'G2' proposal for a second runway at the airport (subsequently abandoned). This evaluation found evidence of dispersed Late Bronze Age and Iron Age settlements with finds limited to ditches, pits, ephemeral gullies, and fragments of pottery. These artefacts indicate activity which is typical of the small agriculturally orientated settlements that are known to have existed in the area.
- 6.41 The potential development impacts on these remains are considered as likely to vary from 'No Change' to 'Moderate' depending on the location of the archaeological assets and the depth and location of any works which may truncate buried deposits (e.g. cable trenches).

6.42 It is considered that the proposed development is unlikely to have any significant adverse effects on archaeology, and any that impacts that might occur could be adequately mitigated. Such mitigation could be secured through a planning condition, if required.

#### **Ecology and Biodiversity**

- 6.43 There are two local Sites of Special Scientific Interest (SSSIs) in the area Elsenham Wood (also known as East End Wood) SSSI and Hatfield Forest SSSI located within 2km of the site. It is not anticipated that the development of a solar farm would have any impact on these sites, not least because of the intervening roads, the airport campus and other infrastructure which lies in between. Although the site falls within the Impact Risk Zone (IRZ) for these SSSIs (as identified in the Local Plan Proposals Map extract above), this designation is primarily related to the potential impacts from increased population pressures on these sites from housing developments i.e. rather that direct impacts from the physical presence of developments alone. Nevertheless, UDC is required to consult with Natural England (NE) regarding any proposed developments within this Zone and would be expected to do so for the proposed solar farm.
- 6.44 A Preliminary Ecological Appraisal (PEA), comprising a desk study, Phase 1 Habitat Survey and an ecological scoping survey, was carried out in November 2019. This initial work determined those parts of the site which had the potential to support Great Crested Newts (GCN), foraging bats, breeding birds, badgers and other species and acted to inform a programme of follow-up surveys. A full suite of ecological surveys and a full Ecological Appraisal was completed in December 2021 and accompany this application.
- 6.45 The potential for most species is largely restricted to the vegetated margins of site rather than the developable area which will contain the solar farm. Nevertheless, to determine if

- these species were actually present on the site or not, a range of protected species surveys was undertaken during the appropriate survey periods.
- 6.46 Great Crested Newt (GCN) surveys for all ponds within 500m of the site returned negative results meaning that it is unlikely that GCN are present in these ponds and therefore unlikely that they will be present on-site or impacted during the proposed works. It is deemed that there are no further surveys or mitigation required in respect of GCN.
- 6.47 Common Lizard was recorded within the site boundary. It is considered that the site contains a 'low' population of Common Lizard of importance at a local level. Mitigation measures are therefore set out in Section 5 of the Ecological Appraisal.
- 6.48 Bat activity was recorded and static surveys across the site showed that the site was used by low levels of foraging and commuting bats. Several hedgerow trees with bat roost potential were identified and assessed. These trees were considered to have a range of roosting potential for bats but are to be retained for the final scheme so further surveys are not deemed necessary. Mitigation measures in respect of night working and lighting are set out in Section 5 of the Ecological Appraisal.
- 6.49 A breeding bird assemblage of 32 species was recorded in 2021 with 13 species meeting at least one of a range of criteria relating to conservation importance and / or special statutory protection. Birds recorded on site include a typical assemblage of farmland bird species, as well as Skylark, Linnet and Yellowhammer. On one survey occasion a significant flock of migratory Golden Plover (an Annex 1 species) was recorded. However, as Golden Plover are an upland nesting species, it is likely to have been a transitionary occurrence and these birds had most probably just stopped to forage at the site as they were passing by. None of the species were present in any significant numbers, i.e. approaching 1% of the U.K. population. The diversity of species present within the survey area is at a level indicative of local importance to breeding birds.
- 6.50 The hedgerows, scattered trees and arable land on-site were considered to offer potential nesting habitat for a range of bird species. No nesting bird surveys will be required if any habitat removal / construction activity is undertaken outside of the bird nesting season (March to August inclusive). However, if removal / construction is undertaken within the season, a nesting bird check by a suitably qualified ecologist will be required prior to any works. In the case of ground nesting birds, monitoring during the construction phase may also be required. A full Tree Survey and Arboricultural Impact Assessment accompany the application and demonstrate that the removal of a solitary tree of relatively low value is required to facilitate the development. All other trees are retained and are supplemented

- through the planting of new hedgerow trees in association with the hedgerow enhancement.
- 6.51 The site provided habitat suitable for foraging and commuting badgers and the presence of badger setts within and adjacent to the site has been confirmed. The current proposals employ an avoidance approach with all setts to be retained and no works within 30m of an active sett. The possibility of future sett building cannot be entirely ruled out and mitigation and monitoring requirements are set out in the Ecological Appraisal.
- 6.52 Japanese Knotweed, a Schedule 9 invasive species (Wildlife and Countryside Act 1981 as amended) was found to be present in close proximity to the works. It was considered that the Japanese Knotweed was at a sufficient distance from the works not to be spread as a result. However, a management plan was developed and a herbicide control programme is being implemented in accordance with that plan.
- 6.53 Planning policy at a national and local level encourages ecological enhancement in development projects to achieve a 10% increase in biodiversity value. In accordance with our Biodiversity Strategy for the airport, we have targeted a substantial Biodiversity Net Gain (BNG) on this site, including the protection and enhancement of existing habitats and the creation new ones such as wildflower meadows, 'bug hotels', bat and bird boxes. The DEFRA BNG metric 3.0 has been used to calculate the net gain achieved through the landscape and habitat proposals. The baseline units of habitat value prior to construction were calculated to have a total of 46.98 units. Following the implementation of the proposed landscape and habitat improvements the post construction units of habitat value have been calculated to be 123.79, an increase of 163.48%. The baseline units for hedgerows within the site prior to construction have been calculated to be 20.06 units. With the enhancements and new planting proposed as part of this proposal the number of hedgerow units increase to 25.99 units, and uplift of 25.57%. Both represent a significant uplift on the expected 10% BNG.

6.54 In light of the above, it is considered that the proposed development is unlikely to have any significant adverse effects on ecology which could not be adequately mitigated. Moreover, there will be a substantial improvement in biodiversity and habitat value for the site as a whole, including considerable areas set aside for wildlife. As such the proposal more than satisfies the tests set out in Local Plan Policies GEN7, ENV7 and ENV8.

#### Water Resources, Flood Risk Assessment and Drainage Strategy

- 6.55 Environment Agency (EA) flood mapping shows the site to be within Flood Zone 1, meaning it has a 'low probability' of fluvial or tidal flooding. The area is also not at any significant risk from surface water flooding, with an annual chance of flooding of less than 0.1%.
- 6.56 The site is not indicated to be located in a groundwater source protection zone and there are no sensitive groundwater abstractions in the vicinity of the site.
- 6.57 The EA surface water flood risk mapping identifies a pronounced surface water flow path associated with one of these watercourses. Therefore, the PV arrays, electricity sub-station, battery storage units and other built elements of the solar farm will be kept out of the surface water flood extents associated with these flow paths and will be set back by at least 8m from them.
- 6.58 The proposed solar farm is unlikely to require any extensive drainage system because there will only be limited areas of hardstanding and rain falling on to the panels will naturally run off and percolate into the underlying ground. As such, Greenfield surface water run off rates can be maintained without the need to incorporate specific drainage attenuation features or active sustainable drainage measures.
- 6.59 Regardless of the lack of impacts, because of the overall size of the site (being in excess of 1ha) a Flood Risk Assessment and Drainage Strategy accompanies the planning application.

#### Summary

6.60 In view of the above, no significant effects are anticipated from the proposed development with regards to flood risk and drainage. Because of the low overall risk of flooding the site satisfies the NPPF sequential test. According to table 3 of the PPG to the NPPF, 'less vulnerable' developments are considered appropriate in Flood Zone 1 without the requirement to carry out the Exception Test. No such test has therefore been undertaken and the proposal accord fully with Policy GEN3 of the Local Plan.

#### **Ground Conditions**

- 6.61 The NPPF requires that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability or contamination. Local Plan Policy ENV14 requires that where land is known or is strongly suspected to be contaminated, and this is causing or may cause, or pollution of controlled waters (including groundwater) a site investigation, risk assessment, proposals and a timetable for remediation will be required.
- 6.62 Accordingly a Phase 1 Contamination Preliminary Risk Assessment has been prepared for the site and a short summary of the findings is presented below.

- 6.63 An outline conceptual site model (CSM) has been derived on the basis of the desktop study and site reconnaissance. No significant potentially contaminative current or historical land uses have been identified on site. The site currently comprises predominantly agricultural fields. Therefore, current potential sources of contaminants are limited to chemicals associated with the growing of arable crops including the potential use herbicides, pesticides and fertilisers.
- 6.64 The only property in proximity to the site with the potential to cause contamination is McMillan's Engineering (previously Hammer Services) to the north, which specialises in sales and repair of 'side lifter' vehicles. However, because of its distance from the site, it is considered highly unlikely to have caused any cross contamination of the site itself.
- 6.65 Made Ground may be present in the areas of the site that have previously been subject to development /demolition and at the locations of the former water features (now potentially infilled). However, due to the small scale of these features and the likely low permeability of the underlying natural soils, any contaminants associated with fill material are unlikely to have caused widespread impact beneath the site.
- 6.66 If any visual or olfactory evidence of contamination is encountered during the groundworks/ cable installation, works in the affected area would cease until further investigations are completed by a qualified consultant. Any necessary mitigation measures would then be put in place.
- 6.67 It is considered unlikely that there would be significant active potential pollutant linkages upon completion of the proposed installation of the solar farm on the site.

6.68 It is considered highly unlikely that there would be significant potential for contamination and associated environmental effects from either the construction or operation of the proposed solar farm. If structures or plant/maintenance facilities are located in the area of infilled water features adjacent to McMillan's Engineering to the north of the site, localised site investigations may be carried out to determine the nature and composition of underlying ground. Local Plan Policy ENV14 is satisfied in respect of the provision of the Phase 1 Preliminary Risk Assessment providing the basis for proceeding with the development with agreed protocol for what happens if any contaminated round is encountered being capable of being secured by condition.

#### Air Quality

6.69 The site is not located within or near an Air Quality Management Area (AQMA), with the nearest AQMA located in Bishop Stortford, 6.8km to the west. Given the limited traffic

- associated with the proposed development, as outlined above, there is unlikely to be any associated measurable impact on local air quality.
- 6.70 Air quality impacts from construction, such as dust or vehicular emissions, would be managed through a Construction Environmental Management Plan (see below), prepared and agreed with the Council prior to construction commencing on site. The CEMP and Construction Traffic Management Plan will implement and manage good practice industry standards throughout the works.

6.71 Air quality impacts from the proposed development are likely to be negligible with appropriate mitigation measures set out in the CEMP and CLP. This point was made and accepted in the responses to the request for screening opinion for Environmental Impact Assessment submitted to Uttlesford District Council and separately to the Planning Inspectorate. Therefore, no further assessment is considered to be necessary.

#### Noise, Vibration and Neighbouring Amenity

- 6.72 Policy ENV4 of the Local Plan seeks to ensure that new development does not have a harmful impact on the surrounding occupiers by virtue of noise or vibration, smell, dust, light, fumes, electromagnetic radiation or exposure to other pollutants. Noise and vibration impacts from construction works would be managed through the CEMP, prepared and agreed with the Council prior to construction commencing on site. If 'pile' driven foundations are utilised, the potential impacts on any nearby noise sensitive properties (including wildlife) will be carefully managed with portable noise screens and/or other noise attenuation measures employed where necessary.
- 6.73 The proposed development will not have any significant noise or vibration related emissions associated with its operation, as solar farms are inherently passive facilities with no moving plant. Minor noise sources such as the on-site inverters are unlikely to be discernible given the central positioning of this plant within the site, landscape screening and the considerable distance to the nearest residential property.
- 6.74 The CEMP similarly sets out measures to control both dust and light generation that are appropriate in the vicinity of an airport. Measures to control and suppress dust during the construction phase will be employed and any construction lighting or final scheme lighting will be designed to avoid any aerodrome safeguarding issues arise through the employment of flat cut-off glass with no light-spill beyond the horizontal plane.

6.75 Noise and vibration impacts form the proposed development are likely to be negligible with appropriate mitigation measures set out in the CEMP. Other matters such as the avoidance of dust and light pollution are similarly set out in the CEMP. Therefore, no further assessments are considered to be necessary and the requirements of Local Plan policy ENV 4 met.

#### Construction Environment Management Plan

- 6.76 An outline Construction Environmental Management Plan (CEMP) will be developed by MAG/ STAL to inform and manage the potential construction impacts of the proposed development. The implementation of the procedures and 'site rules' set out in the CEMP (including a commitment to sign up to the UK Considerate Contractors Scheme) will be a pre-condition for the appointment of the Principal Contractor for the project. This Contractor will then be required to refine and implement the CEMP throughout the construction programme. This will ensure that a consistent approach to site environmental management is employed in line with 'best practice' guidance, thereby avoiding or minimising any significant impacts to the environment and local residents (e.g. from noise, dust and HGV traffic).
- 6.77 With regards to potential construction impacts, these are likely to be relatively minor even prior to the implementation of mitigation measures. As described above, HGV movements associated with the construction of the solar farm will be limited in number, and relatively infrequent throughout the day.
- 6.78 The development will require the delivery and storage of other construction materials, plant, machinery and office/ welfare accommodation. A temporary construction compound will therefore be required. This compound would be carefully located in order to minimise environmental or amenity impact. The planning application will contain details of its size, location and anticipated life of this facility.
- 6.79 The development is likely to require some excavation of soils associated with the construction compound, access roads, cable trenching etc. Where such soil stripping occurs, topsoil and subsoil will be stripped, stored and replaced separately in order to minimise soil damage and to provide optimal conditions for future site restoration. As the proposed solar farm will be developed on agricultural land, the intention is that this development would be 'reversible' at the end of the life of the facility (assumed to be 25 years) if this is desired at that time. Intrusive development, such as trenching and foundations, will therefore be minimised, and the use of mass concrete avoided.

- 6.80 It is likely that the PV arrays will be installed either by 'pile' driven or screw foundations, or pre-moulded concrete blocks (shoes), both of which are capable of easy removal.
- 6.81 Existing trees and hedges on site will be protected during construction. The impact of the proposed development on established trees and hedges will be informed by a tree survey in accordance with British Standard BS 5837.

#### Other issues

#### Solar Glint and Glare

6.82 As has been referenced earlier in this statement solar glint and glare can be an issue in the vicinity of the airport with glint having the ability to create an ocular distraction to pilots and glare having the potential to affect visibility from the air traffic control tower. The design of the proposal has been influenced by these factors as set out in the technical study by Pager Power (Solar Photovoltaic Glint and Glare assessment, Feb 22) that accompanies this application. It was found that the northernmost part of the installation had the potential to generate 'yellow glare'. This resulted in a change to the orientation of the panels in this part of the proposal to an east-facing orientation. This has removed the issue of glare affecting the occupants of the control tower. There is a residual glint effect that can affect 'circuiting' aircraft, but these movements are exceptionally rare at Stansted and it is felt that the effect can be managed through the issuing of operational instructions to pilots conducting these manoeuvres.

#### Climate Change

- 6.83 In terms of the characteristics and purpose of the development, the proposals will generate 'zero carbon' electricity and therefore play an important part in the airport's objective of achieving and maintaining carbon neutrality. Solar farms are an important component of renewable energy mix in the U.K. and one means of helping reduce the country's contribution to global climate change.
- 6.84 It has been provisionally estimated that proposed Stansted Solar Farm, once fully built out, could contribute to a significant reduction of some 5,920 metric tons of carbon dioxide (CO2) emissions within the Uttlesford District each year. This would directly support one of UDC's key objectives which is enshrined in its declaration of a 'Climate Emergency', as described in Section 1 of this report. Such reductions in emissions would also contribute to achieving compliance with the UK Climate Change Act with the target of achieving net-zero carbon emissions by 2050.

#### Waste and Natural Resources

6.85 Construction waste will be managed through the implementation of a Site Waste Management Plan (SWMP) as signalled in the accompanying Outline Construction

Environment Management Plan (CEMP). This will be prepared by the principal contractor and will be agreed with the Council prior to construction commencing on site. Due to the modular form of construction, with the PV panels and frames manufactured off-site, very little construction waste is envisaged. However, as stated previously, the development is likely to require the excavation of some soils associated with the construction compound, access road and cable trenching. Therefore, where such soil stripping occurs, topsoil and subsoil will be stripped, stored and replaced separately in order to minimise soil damage and to provide optimal conditions for future site restoration (should this be desired at the time).

6.86 There will be no operational waste from the proposed development, with the exception of where occasional maintenance or replacement of the PV panels is required. Any such maintenance waste will be removed from the site by specialist contractors and then recycled.

#### Health and Well Being

- 6.87 There are unlikely to be any significant negative impacts on people's health and wellbeing from the construction or operation of the solar farm. Impacts from dust, noise and other nuisance effects during the construction stage will be managed through the implementation of measures set out within the CEMP. Operational traffic and other activity on site are expected to be minimal and, as such, would not have any discernible impact on air quality, noise or other factors.
- 6.88 No adverse effects on health and wellbeing are therefore anticipated.

# 7 Community Engagement

- 7.1 Guidance relating to consultation is set out both at national and local levels of governance.
- 7.2 STAL has developed a strong partnership with local communities neighbouring the site. It has a long-established practice of community outreach events promoting face to face dialogue. STAL has regular liaison with adjoining local authorities and statutory agencies on both political and officer levels and remains committed to these relationships. The Community Strategy is a fundamental pillar of the airport's Sustainable Development Plan (SDP).
- 7.3 With the Covid restrictions in place the usual form of face-to-face engagement was not possible with this application. In late summer of 2021, STAL was preparing to engage Uttlesford District Council in respect of seeking a request for Screening Opinion as set out in the EIA Regulations. In advance of that submission STAL sought to publicise the proposal so that it was in the public domain and that any publicity deriving from engaging the EIA screening process would not be unexpected. Publicity was directed to all residential and commercial properties on Parsoange Road and Hall Road, to Local ward members and the Council Leader, the local Member of Parliament, the Chair of the airport's independent Consultative Committee, the Director of Environment at Essex County Council and the current tenants of the land. A copy of this communication is provided in Figure 9 below. No responses were received to this communication
- 7.4 Following this STAL prepared material to make a request to Uttlesford for a screening opinion under the terms of the Environmenatl Impact Assessment Regulations 2017. Before submitting the information required to Uttlesford we further publicised the scheme by launcing a web-site (https://www.stanstedairport.com/community/solar-farm-project/) and issuing a press release stating that we were about to commence the process of seeking a screening opinion.
- 7.5 The press release was picked up and reported on by a number of press outlets and reports appeared in: the Bishop's Stortford Independent; the Saffron Walden Reporter; the Dunmow Broadcast and the Cambridge Network. The scheme was also reported in a number of industry publications including The Solar Power Portal. A copy of the press release is shown below in Figure 10.

#### Dear Resident

I am writing to you and other local residents to inform you of plans that will support the environmental objectives of London Stansted Airport.

Last year, Manchester Airports Group (MAG), owner of Stansted, published a new Corporate Social Responsibility strategy, 'Working together for a brighter future'. This strategy commits Stansted to making its operations net zero carbon by no later than 2038 – 12 years ahead of the Government's notional target.

I am writing to let you know that, as part of this commitment, we are proposing to install a 14 MW solar farm at High House Farm, immediately to the east of the airport.

This project will see the airport generating its own renewable electricity on site, connecting directly to our own private electrical network and offering a number of benefits. Not only do we gain increased security of energy supply by doing this, but we free up the renewable energy we currently purchase for others to use elsewhere on the grid – helping decarbonise the electricity everybody

This is land already owned by the airport and subject to planning permission from Uttlesford District Council (UDC). We are only in initial discussions with UDC, but I wanted to let you know and to offer my contact details in case you had any further questions.

The project will support the sustainable development of Stansted and includes capacity to expand and meet future energy needs, for example from more widespread adoption of electric vehicles.

We are proposing to locate the solar farm in an area of land that has the least possible visual impact on neighbours. But I appreciate you may have some concerns about this, which is why I wanted to reach out.

Please be assured that, in the event the scheme is successful, we will also implement additional screening measures such as trees, hedgerow reinstatement and new hedgerows, to further reduce the impact of the scheme on neighbours.

We will be sure to communicate more information as and when it becomes available. If you have any questions in the meantime, please do not hesitate to contact me.

Yours faithfully

Figure 9 Communication to neighbours and local stakeholders

The proposal is for a 14MW solar farm on land immediately to the east of the airport, and already owned by Stansted. The airport will also implement a series of screening measures such as planting new trees, hedgerow reinstatement and new hedgerows in the event the scheme is successful.

The solar farm is designed to meet the airport's current energy demands and is in keeping with the airport's commitment to make its operations net zero carbon by no later than 2038.

The airport's operation under its direct control – all buildings and airside vehicles – is already carbon neutral through the introduction of a range of energy management measures and sourcing all its electricity from renewable sources since \*2013.

The project, if approved, will make the airport's energy supply more secure, as well as freeing up renewable generation elsewhere on the grid to help the rest of the country decarbonise faster.

Local residents and other interested parties are encouraged to share their views and provide feedback on the plans, and can find full details of the proposal by visiting the Airport's website: www.stanstedairport.com/community

The consultation will run from Friday 26th November to Friday 24th December. Following this and a thorough review of the feedback, the Airport will submit an application to Uttlesford District Council to seek planning permission for the solar farm. This will then provide a further opportunity to comment on the proposals.

\*To compensate for the small amount of remaining and unavoidable emissions, the airport has also purchased verified carbon offsets.

Figure 10: Press Release text

- 7.6 The web-site conveyed an overview of the proposal, set out the rationale for the chosen site, described the need and benfits of the scheme and set out answers to what were perceived to likely be frequesntly asked questions. There then followed a consultation questionnaire which readers were invited to complete and set out that following the consultation period STAL would review the feedback and where possible use that feedback to refine the proposals. Other opportunities to feedback about the proposal were made clear: "There are various ways that you can respond:
  - By completing an online questionnaire this is available on our website at [insert web address]
  - By emailing your feedback to
  - By returning your feedback in writing to Stansted Airport Solar Farm Consultation, [insert address will it be a Freepost address?]
  - By returning a questionnaire to the above address
  - Via the Airport's social media channels [insert Facebook and twitter links."
- 7.7 It was made clear that updates to the Frequently Asked Questions would be made to answer specific points that arose during the consultation period which ran from 26th November 2021 up until 24th December 2021. It was also made clear that upon submission of the planning application there would be further opportunity to comment on the proposals. The Frequently Asked Questions and the Questionnaire are set out in Appendix 3.
- 7.8 In spite of the media coverage and direct communications, relatively few comments were received either through the on-line questionnaire or through the other means available. In total only 8 responses were made using the questionnaire and only three comments were separately registered through the dedicated email address.
- 7.9 The three email responses can be summarised as follows:
  - why should this be approved when the airport has objected to similar projects in the vicinity of the airport;
  - the highways infrastructure in the vicinity of the proposal should be improved on the back of this proposal; and,
  - the development will attract birds, especially raptors, that should mean it falls foul of aerodrome safeguarding considerations. Clarifications in response to these questions were added to the Frequently Asked Question section of the web-site.

- 7.10 The responses to the questionnaire were generally positive. The answers to question 1 "Do you believe that sourcing renewable energy and reducing carbon emissions is important?" was a unanimously positive response. The answers to question 2 "Do you agree that Stansted Airport should become more self-sufficient in meeting its energy needs?" was seven positive and one negative. The answers to question 3 "Are you likely to support the proposal for Stansted Airports Solar Farm?" was eight positive responses. In explaining their responses the following points were offered:
  - The world needs as much renewable electricity as possible. Why have you not done this sooner?
  - Renewable energy use for a large site such as this is an important short and longer term sustainability ambition
  - Good use of space. Good focus on greening the surrounding land to "screen" the site
  - solar power is good, but this should be on top of a car park, ie dual use
  - Providing you don't let weeds like dandylions thrive on the site. Their seeds can 'fly' great distances.
  - Support all but the lack of a link to the grid to export surplus.
  - Solar Farms provide lots of useful energy and natural environments without adding noise or other pollutants to the atmosphere. Reasonable screening will be more than adequate
- 7.11 The answers to question 4 "Do you believe that there are alternative means by which Stansted Airport could meet its energy needs?" were far more split with three answering positively and five negatively. However, only three people sought to clarify their answers offering the following:
  - Solar PV over car parks, GSHP, ASHP, wind turbines
  - they could install solar panels over the terminal and existing car parks and all other buildings. They could install power generating paths and roads throughout.
  - Yes by less flights either in or out.
- 7.12 Question 5 asked "Do you believe that there are alternative locations that Stansted Airport could safely locate this facility?" to which six answered 'no' and only two answered 'yes'. Reasons offered for this response were:
  - Over car parks etc. Works for other international airports!
  - over the existing car parks and on the roof of the terminal and other buildings
  - I don't know.

- 7.13 In the ordinary course of events the Airport would have conducted this enagement utilising its more usual outreach events in the local communities. However, given the circumstances created by Covid-19 this was not possible. The extensive local media coverage, update briefings to the Airport's independent Consultative Committee and the dedicated interactive web-site provided ample opportunity for public engagement in the scheme.
- 7.14 The web-site will be updated to signal the submission of the application to the Planning Inspectorate with a link to the application page. Similarly those individuals and organisations directly engeaged have been informed of the same and will be further contacted when the application has a presence on the Section 62A web-site. The Local Planning Authority has been advised of the submission as have statutory consultees.

# 8 Conclusion and Planning Balance

- 8.1 It is proposed to develop this section of High House Farm for a solar photovoltaic farm to supply the airport's electricity needs. This will support the airport's publicly stated aim to achieve net zero carbon for its own operations by 2038 and helps to secure an energy supply resilience for the airport. This aligns strongly with Government's stated objectives to decarbonise the economy as set out in the NPPF and accompanying NPPG and the Energy National Policy Statement.
- 8.2 Through separate Environmental Impact Assessment (EIA) Screening Opinion process conducted with Uttlesford District Council and with the Planning Inspectorate it has been confirmed (see Appendix 2) that whilst constituting an EIA Regulations Schedule 2 development because of its site area, there are no environmental effects sufficient to require an EIA to accompany the application.
- 8.3 Consideration therefore turns as to whether or not the proposal conforms with the Development Plan, Uttlesford Local Plan 2005 Saved Policies, or any other material considerations such as subsequently issued Supplementary Planning Documents and Policies. The commentary in Section 6 demonstrates that with necessary and appropriate mitigation the proposal meets the policy tests in the Development Plan, and there are no material considerations that weight against the proposal.
- 8.4 As such, with respect to the planning policies contained within the Development Plan and the nationally applying policies and principles set out in NPPF / NPPG / Energy Policy Statement, planning permission should be granted.

# Appendix 1 – Relevant Local Planning Policies

#### Uttlesford Local Plan 2005 - Saved Policies

Policy S7 – The Countryside The countryside to which this policy applies is defined as all those parts of the Plan area beyond the Green Belt that are not within the settlement or other site boundaries. In the countryside, which will be protected for its own sake, planning permission will only be given for development that needs to take place there, or is appropriate to a rural area. This will include infilling in accordance with paragraph 6.13 of the Housing Chapter of the Plan. There will be strict control on new building. Development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set or there are special reasons why the development in the form proposed needs to be there.

Policy S8 – The Countryside Protection Zone The area and boundaries of the Countryside Protection Zone around Stansted Airport are defined on the Proposals Map. In the Countryside Protection Zone planning permission will only be granted for development that is required to be there, or is appropriate to a rural area. There will be strict control on new development. In particular development will not be permitted if either of the following apply:

- a) New buildings or uses would promote coalescence between the airport and existing development in the surrounding countryside;
- b) It would adversely affect the open characteristics of the zone.

Policy GEN1 – Access Development will only be permitted if it meets all of the following criteria:

- a) Access to the main road network must be capable of carrying the traffic generated by the development safely.
- b) The traffic generated by the development must be capable of being accommodated on the surrounding transport network.
- c) The design of the site must not compromise road safety and must take account of the needs of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired.
- d) It must be designed to meet the needs of people with disabilities if it is development to which the general public expect to have access.
- e) The development encourages movement by means other than driving a car.

Policy GEN2 – Design Development will not be permitted unless its design meets all the following criteria and has regard to adopted Supplementary Design Guidance and Supplementary Planning Documents.

- a) It is compatible with the scale, form, layout, appearance and materials of surrounding buildings;
- b) It safeguards important environmental features in its setting, enabling their retention and helping to reduce the visual impact of new buildings or structures where appropriate;
- c) It provides an environment, which meets the reasonable needs of all potential users.
- d) It helps to reduce the potential for crime;
- e) It helps to minimise water and energy consumption;
- f) It has regard to guidance on layout and design adopted as supplementary planning guidance to the development plan.
- g) It helps to reduce waste production and encourages recycling and reuse.
- h) It minimises the environmental impact on neighbouring properties by appropriate mitigating measures.
- i) It would not have a materially adverse effect on the reasonable occupation and enjoyment of a residential or other sensitive property, as a result of loss of privacy, loss of daylight, overbearing impact or overshadowing.

Policy GEN3 – Flood Protection Within the functional floodplain, buildings will not be permitted unless there is an exceptional need. Developments that exceptionally need to be located there will be permitted, subject to the outcome

of flood risk assessment. Where existing sites are to be redeveloped, all opportunities to restore the natural flood flow areas should be sought. Within areas of flood risk, within the development limit, development will normally be permitted where the conclusions of a flood risk assessment demonstrate an adequate standard of flood protection and there is no increased risk of flooding elsewhere.

Within areas of the floodplain beyond the settlement boundary, commercial industrial and new residential development will generally not be permitted. Other developments that exceptionally need to be located there will be permitted subject the outcome of a flood risk assessment.

Outside flood risk areas development must not increase the risk of flooding through surface water run-off. A flood risk assessment will be required to demonstrate this. Sustainable Drainage Systems should also be considered as an appropriate flood mitigation measure in the first instance.

For all areas where development will be exposed to or may lead to an increase in the risk of flooding applications will be accompanied by a full Flood Risk Assessment (FRA) which sets out the level of risk associated with the proposed development. The FRA will show that the proposed development can be provided with the appropriate minimum standard of protection throughout its lifetime and will demonstrate the effectiveness of flood mitigation measures proposed.

Policy GEN4 - Good neighbourliness Development and uses, whether they involve the installation of plant or machinery or not, will not be permitted where:

- a) noise or vibrations generated, or
- b) smell, dust, light, fumes, electro magnetic radiation, exposure to other pollutants; would cause material disturbance or nuisance to occupiers of surrounding properties

Policy GEN7 – Nature Conservation Development that would have a harmful effect on wildlife or geological features will not be permitted unless the need for the development outweighs the importance of the feature to nature conservation. Where the site includes protected species or habitats suitable for protected species, a nature conservation survey will be required. Measures to mitigate and/or compensate for the potential impacts of development, secured by planning obligation or condition, will be required. The enhancement of biodiversity through the creation of appropriate new habitats will be sought.

Policy E4 - Farm Diversification: Alternative use of Farmland Alternative uses for agricultural land will be permitted if all the following criteria are met:

- a) The development includes proposals for landscape and nature conservation enhancement;
- b) The development would not result in a significant increase in noise levels or other adverse impacts beyond the holding;
- c) The continued viability and function of the agricultural holding would not be harmed;
- d) The development would not place unacceptable pressures on the surrounding rural road network (in terms of traffic levels, road safety countryside character and amenity).

Policy ENV2- Development affecting Listed Buildings Development affecting a listed building should be in keeping with its scale, character and surroundings. Demolition of a listed building, or development proposals that adversely affect the setting, and alterations that impair the special characteristics of a listed building will not be permitted. In cases where planning permission might not normally be granted for the conversion of listed buildings to alternative uses, favourable consideration may be accorded to schemes which incorporate works that represent the most practical way of preserving the building and its architectural and historic characteristics and its setting

Policy ENV3- Open Spaces and Trees The loss of traditional open spaces, other visually important spaces, groups of trees and fine individual tree specimens through development proposals will not be permitted unless the need for the development outweighs their amenity value.

Policy ENV4 Ancient Monuments and Sites of Archaeological Importance. Where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development there will be a presumption in favour of their physical preservation in situ. The preservation in situ of locally important archaeological remains will be sought unless the need for the development outweighs the importance of the archaeology. In situations where there are grounds for believing that sites, monuments or their settings would be affected developers will be required to arrange for an archaeological field assessment to be carried out before the planning application can be determined thus enabling an informed and reasonable planning decision to be made. In circumstances where preservation is not possible or feasible, then development will not be permitted until satisfactory provision has been made for a programme of archaeological investigation and recording prior to commencement of the development.

Policy ENV5 - Protection of Agricultural Land Development of the best and most versatile agricultural land will only be permitted where opportunities have been assessed for accommodating development on previously developed sites or within existing development limits. Where development of agricultural land is required, developers should seek to use areas of poorer quality except where other sustainability considerations suggest otherwise.

Policy ENV7 - The Protection of the Natural Environment - Designated Sites Development proposals that adversely affect areas of nationally important nature conservation concern, such as Sites of Special Scientific Interest and National Nature Reserves, will not be permitted unless the need for the development outweighs the particular importance of the nature conservation value of site or reserve.

Development proposals likely to affect local areas of nature conservation significance, such as County Wildlife sites, ancient woodlands, wildlife habitats, sites of ecological interest and Regionally Important Geological/Geomorphological Sites, will not be permitted unless the need for the development outweighs the local significance of the site to the biodiversity of the District. Where development is permitted the authority will consider the use of conditions or planning obligations to ensure the protection and enhancement of the site's conservation interest.

Policy ENV8 – Other Landscape Elements of Importance for Nature Conservation Development that may adversely affect these landscape elements: Hedgerows, Linear tree belts, Larger semi natural or ancient woodlands, Seminatural grasslands, Green lanes and special verges, Orchards, Plantations, Ponds, reservoirs, River corridors, Linear wetland features, Networks or patterns of other locally important habitats, will only be permitted if the following criteria apply:

- a) The need for the development outweighs the need to retain the elements for their importance to wild fauna and flora;
- b) Mitigation measures are provided that would compensate for the harm and reinstate the nature conservation value of the locality. Appropriate management of these elements will be encouraged through the use of conditions and planning obligations.

Policy ENV14 – Contaminated Land Before development, where a site is known or strongly suspected to be contaminated, and this is causing or may cause significant harm, or pollution of controlled waters (including groundwater) a site investigation, risk assessment, proposals and timetable for remediation will be required.

Policy ENV15 - Renewable Energy Small scale renewable energy development schemes to meet local needs will be permitted if they do not adversely affect the character of sensitive landscapes, nature conservation interests or residential and recreational amenity.

Policy AIR1 – Development in the Terminal Support Area Land adjoining the terminal, as shown on the Inset Map, is principally reserved for landside road and rail infrastructure and a telecommunications building, airside roads, the apron, passenger vehicle station rapid transport system and other airside operational uses; terminal support offices; an hotel and associated parking; a bus and coach station and short term and staff car parks.

Policy Air2 – Cargo Handling / Aircraft Maintenance Area The area shown on the Inset Map as the cargo handling/aircraft maintenance area is principally reserved for the repair, overhaul, maintenance and refurbishment of aircraft, and facilities associated with the transfer of freight between road vehicles and aircraft or between aircraft.

Policy AIR3 – Development in the Southern Ancillary Area The area of land identified on the Inset Map as the southern ancillary area will be principally reserved for activities directly related to, or associated with the Airport, such as car hire, parking, maintenance and valeting operations; flight catering units; offices for various support functions, freight forwarders and agents; support functions for aircraft maintenance which can be carried out remote from an aircraft being serviced; airline training centres; airline computer centres and equipment storage facilities for airlines. Development will take place in phases based on a broad design brief agreed with the Council.

#### Uttlesford Energy Efficiency and Renewable Energy Supplementary Planning Document 2007

**Uttlesford Guidance** 2.7 The following guidance is based on the energy hierarchy below which sets out in order of priority the ways in which energy use can be reduced. The Council will expect developers to look at the higher levels first and only once these have been addressed to move down to the lower levels.

Hierarchy 1 Avoiding Unnecessary Energy Use. Re-organise systems so that energy use can be reduced to the minimum, for example by designing buildings to be warmed by the sun, using natural light and ventilation, or enabling people to get access to the amenities they want with fewer and shorter car journeys.

Hierarchy 2 Use Energy more Efficiently. Finding ways of getting more benefit per unit of energy, for example by using higher efficiency appliances, generating heat and power together or insulating buildings better to retain heat.

Hierarchy 3 Use Renewable Energy. Switch to less damaging low-carbon energy sources, especially renewables, for example solar and wind power, energy crops or hydro.

Hierarchy 4 Offsetting Emissions. The Council is proposing to seek developer contributions where development leads to increased emissions. The contributions will be used to provide grants and incentives for people to reduce greenhouse gas emissions from existing housing by investing in energy efficiency and renewable energy.

#### 3. Use Renewable Energy

2.23 New buildings should be designed for energy efficiency and where possible should include some form of renewable energy and combined heat and power generation. The council would prefer this to be on site but off site solutions may be considered where clear benefits can be demonstrated e.g where the needs of more than one development can be supplied. Renewable energy technologies can also be introduced onto existing buildings but this is only advisable after all the basic measures have been introduced to make the existing building as efficient as possible.

#### Solar PhotoVoltaic Systems

2.27 These consist of semiconductor cells which are connected together to form a panel which is usually attached to a roof or wall that faces within 90 degrees of south. Panels can also be mounted on freestanding support structures on the ground. Cells are also being developed which can be incorporated into roofing materials, cladding and glazing. When sunlight shines on the cells a current is produced and electricity is supplied to the property via an inverter. Surplus electricity can be sold back to the local distribution network.

Uttlesford Guidance 6 Planning permission is not normally be required but if you are planning to install solar panels or PhotoVoltaic Panels you should check with the planning department first. Planning permission may be required if the panels change the shape of the roof or are raised more than a specified height above the roof slope - normally 150mm. If the building is listed, listed building consent will be required. The Council would not normally grant listed building consent unless the panel can be placed on an inconspicuous roof slope. An alternative may be to mount the panels on a frame in the garden or on a non listed building e.g garage within the grounds of the property. If the

building is in a Conservation Area but not listed the panels should be placed in a location which is not visible from the street. The Council will encourage developers to consider using solar PV panels as part of the external walls as an alternative to decorative cladding in steel-framed commercial buildings.

#### Essex County Council - Highways Development Management Policies 2011

Policy DM1 General Policy The Highway Authority will protect the highway network for the safe and efficient movement of people and goods by all modes of travel by ensuring that:

- i. all proposals are assessed and determined in relation to the Development Management Route Hierarchy Policies (Policies DM2 DM5);
- ii. where vehicular access is accepted in principle; the number of access points will be kept to a minimum on roads designated within the Development Management Route Hierarchy;
- iii. where access is accepted in principle; new access points will be designed and constructed in accordance with the current standards;
- iv. where existing access is to be used, substandard accesses will be improved and/or upgraded in accordance with the current standards for the category of road;
- v. all proposals are assessed and determined against current standards for the category of road having regard to the capacity, safety and geometry of the highway network;
- vi. all proposals have safe and convenient access for sustainable transport modes commensurate to its location; vii. proposals will not create a significant potential risk or be detrimental to the safety of the highway network.

Policy DM7 Application Of Design Standards The Highway Authority will protect the highway network for the safe and efficient movement of people and goods by ensuring that all works within the highway comply with the current national and ECC design standards appropriate for the category of road and ensuring that:

- i. visibility splays and stopping sight distances (SSD) for all roads, with the exception of internal estate roads which carry or are intended to carry HGVs and/or passenger transport vehicles at a level of less than 5% of the overall traffic flow, must comply with standards contained within DMRB unless otherwise agreed with the Highway Authority.
- ii. visibility splays and SSD for internal estate roads must comply with standards contained within the Essex Design Guide or Manual for Streets, or their subsequent replacement documents, except where 5% or more of the overall traffic flow consists of Heavy Goods Vehicles (HGVs) and/or passenger transport vehicles;
- iii. where engineering measures have been implemented to provide a pedestrian prioritised environment, visibility splays and SSD must comply with standards contained within the Essex Design Guide or Manual for Streets, or their subsequent replacement documents.

Policy DM12 Rural Diversification The Highway Authority has no general presumption against the reuse of agricultural buildings in rural areas. Each site will be assessed on its own merit and having regard to all other policies contained within this document. The Highway Authority will consider the net change in road traffic impacts, including but not restricted to vehicle numbers, vehicle types and hours of operation, between existing and proposed land uses.

#### Policy DM13 Transport Assessments The Highway Authority will require:

- i. a Transport Statement (TS) to accompany a planning application in accordance with the thresholds as set out in Appendix B, or where the Highway Authority deems it to be necessary;
- ii. a Transport Assessment (TA) to accompany a planning application in accordance with the thresholds as set out in Appendix B, or where the Highway Authority deems it to be necessary;
- iii. a School Transport Statement for development at existing educational establishments where pupil and/or staff numbers are proposed to increase.

Policy DM14 Safety Audits The Highway Authority will require:

- i. a Stage 1 Safety Audit report including designer's response where appropriate, to accompany any planning application which seeks to materially alter the existing highway;
- ii. any safety audit accompanying a planning application to have been carried out in accordance with current standards by an independent safety auditor.

Policy DM16 Air Quality The Highway Authority will assist the Local Planning Authority in the protection of areas that have been designated as unacceptable in terms of air quality by:

i. having a general presumption against the provision of development that would cause a negative impact to existing designated Air Quality Management Areas (AQMA) through increased traffic or congestion, unless appropriate mitigation measures are provided by the developer.

Policy DM19 HGV Movement The Highway Authority will protect the safety and efficiency of the highway network by ensuring that any proposals which generate a significant number of heavy goods vehicle movements:

- i. are located in close proximity to Strategic Routes/Main Distributors and/or Secondary Distributors;
- ii. are connected to Strategic Routes/Main Distributors and/or Secondary Distributors via short sections of other roads;
  - ii. will where appropriate require the developer to submit and agree with the Highway Authority a routing management plan in relation to heavy goods vehicle movements.

**Policy DM20 Construction Management** The Highway Authority will protect the safety and efficiency of the highway network by ensuring that:

- i. any temporary construction access and/or haul road will be agreed with the Highway Authority prior to commencement of development;
- ii. a Construction Traffic Management Plan is submitted and agreed with the Highway Authority prior to commencement of development;
- iii. details of parking and turning facilities for all construction traffic within the development site are submitted and agreed with the Highway Authority prior to commencement of development;
- iv. details of wheel cleaning facilities within the development site are submitted and agreed with the Highway Authority prior to commencement of development.

#### Uttlesford Interim Climate Change Planning Policy 2021

Interim Policy 1: Developers should demonstrate the path that their proposals take towards achieving net-zero carbon by 2030, and all the ways their proposals are working towards this in response to planning law, and also to the guidance set out in the NPPF and Planning Policy Guidance. This should include:

- i) locating the development where the associated climate change impacts and carbon emissions, including those derived from transport associated with the intended use of the development can be minimised, and
- ii) promoting development which minimises carbon emissions and greenhouse gas emissions and maximises the use of renewable or low carbon energy generation.

#### Guidance for Planning Applications for Solar Farms in Uttlesford District 2021

Solar farms can provide valuable sources of renewable energy and so Uttlesford District Council supports them in principle. However, the council also recognises that there are potential issues regarding matters such as visual impact and potential loss of best and most versatile agricultural land that need to be considered.

In determining planning applications for new solar farms, the council must have regard to the <u>National Planning</u> <u>Policy Framework</u> (NPPF) and planning legislation. While the NPPF contains an expectation that all areas contribute to renewable energy generation, an argument at the other end of the scale, such as "there are just too many in the

district" is unable to be considered by a planning authority as a stand-alone planning consideration, unless for instance the cumulative visual impact or loss of best and most versatile agricultural land is also a consideration. Solar farms must always be determined in accordance with national planning policy

Uttlesford District Council will include a policy on solar farms as part of the <u>Local Plan</u>. In the interim, national planning policy and guidelines apply to all planning applications for solar farms.

#### National planning policy and guidelines for solar farm planning applications

Uttlesford District Council takes into account national planning policy and guidance in considering planning applications for solar farms. This includes the National Planning Policy Framework, the ministerial speech and written statement and planning policy guidance. The council also has regard to good practice guidelines published by BRE and Natural England. PPG Paragraph: 013 Reference ID: 5-013-20150327 summarises the requirements and reads:

Particular factors a local planning authority will need to consider include:

- encouraging the effective use of land by focussing large scale solar farms on previously developed and non agricultural land, provided that it is not of high environmental value;
- where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays. See also a speech by the Minister for Energy and Climate Change, the Rt Hon Gregory Barker MP, to the solar PV industry on 25 April 2013 and written ministerial statement on solar energy: protecting the local and global environment made on 25 March 2015.
- that solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use;
- the proposal's visual impact, the effect on landscape of glint and glare (see <u>guidance on landscape</u> <u>assessment</u>) and on neighbouring uses and aircraft safety;
- the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;
- the need for, and impact of, security measures such as lights and fencing;
- great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset;
- the potential to mitigate landscape and visual impacts through, for example, screening with native hedges;
- the energy generating potential, which can vary for a number of reasons including, latitude and aspect.

# Appendix 2 – EIA Regulations Screening Opinions

#### **Uttlesford District Council**

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESMENT) (ENGLAND AND WALES) REGULATIONS 2017, (as amended)

#### **ENVIRONMENTAL IMPACT ASSESSMENT**

Supplementary Note to the SCREENING APPLICATION: UTT/21/2664/SCO

PROPOSAL: Request for Screening Opinion for proposed solar farm

**LOCATION:** Land East of Coopers End Road Takeley

#### SCREENING OPINION

Under Regulation 6 of the above Regulations the authority is required to adopt an opinion (a **SCREENING OPINION**) as to whether an Environmental Impact Assessment (an **EIA**) is required in relation to the above planning application that has been submitted to it.

The Local Planning Authority (LPA), Uttlesford District Council, has considered the proposals and its **SCREENING OPINION** is that:

#### AN EIA IS NOT REQUIRED

The considerations, in coming to this decision are as follows:

#### Schedule 1

The proposal does not fall within Schedule 1 of the Regulations that would require mandatory Environmental Impact Assessment (EIA).

#### Schedule 2

Schedule 2 identifies 13 different categories, of which Class 3 is 'Energy Industry' and a) relates to 'Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)'. The proposal exceeds the thresholds. The proposal is not, however located in wholly or partly within a 'sensitive area' as defined by the Regulations.

Uttlesford DC as Local Planning Authority conclude that the proposal does constitute a Schedule 2 form of development as defined by the Regulations. Under these circumstances it is necessary to establish whether the proposal is likely to give rise to 'significant effects' on the environment by virtue of its nature, size or location.

#### Schedule 3 – Criteria for Column 2 of Schedule 2

Schedule 3 of the Regulations sets out selection criteria which must also be taking into account in determining whether the development is likely to have significant effects on the environment.

These criteria are identified under 3 separate headings and I shall deal with each in turn.

The applicants have requested some clarification points, and these are addressed in accordance with their letter to the council. Each point will be addressed separately below:

#### Characteristics of Development

The site consists of approximately 22.5ha of agricultural land. The application shows the general heights and indicative layout of the solar panels.

A project of this scale would require the use of natural resources, most notably the use of agricultural land and an application of this proposal is of such a scale that Natural England have been consulted on the loss of best and most versatile agricultural land; and in this respect, a standalone Agriculture Land Classification Report should be submitted in support of the application.

In terms of the impacts of the proposal on the landscape, geodiversity and biodiversity receptors; the LPA would draw to your attention to the Natural England response to this Request dated 1<sup>st</sup> September 2021.

The location of the site and the current use of the land the proposals are likely to result in less than significant impacts in respect of biodiversity. However, it is noted that a strip of Woodland to the east and northwest corner, which borders the site. The hedgerows bordering the arable fields are likely to meet the criteria for Priority habitat.

Furthermore, the ECC Place Services Ecology have been consulted; a copy of these comments is Appended to this response. The Ecology Team have stated that it is unclear whether the Ecological Impact Assessment has been done in

2. Solar arrays are known to be attractive sites for birds, we would appreciate sight of the plans to mitigate against this problem.

The site is not located within or adjacent to a Flood Zone and therefore, subject to appropriate mitigation measures, should not give rise to increased flooding risks. The risk of accidents is low. The risks to human health are required to be considered as part of the application. Whilst risks arising from potential pollution or water contamination are likely to be low, the main impact is likely to arise from noise during the construction phase. As noted above, the impacts are likely to be low. The working hours (both construction and operational) do not appear to be specified; however, these can be controlled through conditions should a planning application be submitted, and planning permission be granted.

It is considered that even though the scheme exceeds the thresholds on balance the size of the proposal, the accumulation of it with other developments and its surroundings, the use of natural resources, the production of waste during the construction phase, the likelihood of significant additional pollution or other nuisances and the risk of accidents are such that there will not be a significant effect on the environment; this is considered particularly the case as the traffic associated with the proposed development, which has current capacity and air quality issues.

However, this would be further justified and demonstrated through the submission of specialist reports, refer to section below on Characteristics of Potential Impact.

#### **Location of Development**

The subject site falls within an area of local environmental sensitivity by reason of the following:

The site falls within Flood Risk Zone 1 which has a low risk of flooding. The area falls within a ground water protection zone and any works would need to adhere to British Standards.

The site falls within building height restriction zones due to flight paths in connection with London Stansted Airport.

The area falls within the open countryside. Due to the sites rural farm complex appearance, the site would appear to form part of the wider countryside. The proposed development is likely to have a visual impact upon the countryside and, west to east and possibly the site viewed across the fields from the north and south. Whilst there are no public rights of way crossing the site subject to this enquiry, the following are in proximity, thus.

- PROW 48 17 to the west
- PROW 48 45 to the southwest
- PROW 48 12 to the northeast

The site falls within a SSSI consultation zone, together with a Local Wildlife zone at Priors Wood.

The application site lies east of a designated Air Quality Management Area (AQMA).

Therefore, the following documents would be required in support of an application:

- Phase 1 Contaminated Land Report
- Transport Note

   as agreed with ECC Highways.
- Noise / Air Quality Assessment in respect of the construction phase would be covered by a Construction Environmental Management Plan; to be conditioned
- Landscape and Visual Impact Assessment
- Flood Risk Assessment
- Economic Benefit Assessment to be covered in Planning/ Design and Access Statement
- Ecology Report
- Heritage Statement
- Glint and Glare assessment
- Power line asset assessment to be covered in Planning/ D& A Statement.
- Legacy planting this will need to be covered in the Landscape Visual Assessment and Planning Assessment, together with submitted landscaping proposals.

#### Characteristics of Potential Impact

There are recognised sensitive areas of the site and of the proposed development. There would be possible wildlife habitats because of trees and hedges on site's margins, and the changing ground levels. The associated intensification because of the proposed development is likely to have impact in terms of noise and disturbance, with possible litter/pollution, particularly at the construction phase.

As part of any application submission a *Tree survey, arboriculture implication* assessment and method statement, must be undertaken and submitted. A Landscape and Visual Impact Assessment must be assessed. The site is open fields and therefore would be visible from long views.

A statement within the Design and Access statement and Landscaping Visuals would be acceptable to understand the impact of the proposal. The applicants have also confirmed that additional planting will form part of the application and therefore this and tree survey will be submitted.

The applicant is reminded that the Council declared a **Climate and Ecology Emergency** at its full council meeting on 30 July 2019. A Climate Change Strategy has been adopted by the Council. The **l**ink below provides details of this: CLIMATE CHANGE STRATEGY.pdf (moderngov.co.uk)

The applicants will have to address the issues raised above within the submitted Planning/ Design and Access Statement

An *Ecological Report* will be required. The Ecology Team and Natural England have been consulted. The Ecology Team and Natural England have responded. Their comments are online, and they confirmed that the site is not within any protected designation.

Whilst the Screening Opinion Request notes that an assessment of heritage assets will need to be undertaken as part of the application, it should be noted that the proposed development area contains potentially significant archaeological remains.

Any required archaeological evaluation could be conditioned; but only if necessary, following the completion of the archaeological desk study

As part of the desk-based assessment, it is recommended that the cropmarks be digitally rectified as part of this process. Also, there should also be an assessment of the proposed construction technique to be used for the solar farm and how much ground disturbance is proposed. The retention of all cables above ground can significantly reduce the heritage impact on below ground deposits for instance.

Whilst Uttlesford DC note your identification of Heritage Assets, as the site lies near heritage assets, the site has been subject to Screening Opinions and archaeological finds as indicated. Essex County Council Place Services Heritage have responded to the Uttlesford DC consultation request on the 14<sup>th</sup> September 2021

The Local Planning Authority note that you will be submitting a Heritage Assessment, which should include reference to Built Heritage Assets and Archaeology.

The site is located adjacent to an accessible village at Takeley. However, the proposed scheme has the potential for the creation of additional traffic within the

locality due to the construction of the solar panel farm and associated works.

A Construction Traffic Management Plan (CTMP) - to be agreed with ECC Highways, shall be submitted with any application.

Due to the scale of the proposed development, there would no need for the submission of an *Air Quality Assessment*, both in terms of construction works and daily vehicle movement resulting from this development and the fact that the site is not within an AQMA.

The Uttlesford DC Environment Health Team have commented that the proposal should including lighting and construction management plan in any application. This would not necessarily mean that an Environmental Impact Assessment is required.

With regards to any visual impact because of the development a **Design and Access Statement** and **Visual Landscape Assessment** would need to be submitted as part of any application submitted and is an aspect that would be assessed as part of any application determination.

The proposal is in an open area and planting for the site will be critical for the site in long term. The issue of legacy planting will require long term views of providing planting for the term of the project; this can be included with landscaping proposals in support of the application.

**Waste Management** in terms of methods of reducing, re-using and recycling waste in accordance with national legislation should be included within a CEMP – likely to be conditioned, together with a Statement within the submitted within the submitted Planning/ Design and Access Statement will deal with Sustainability in line with emerging Interim Council Policy and national legislation.

A **Flood Risk Assessment** is required as part of the planning submission due to the size of the site area. It would need to be demonstrated that the proposed scheme would create a neutral affect or betterment and that it would not increase the risk of flooding to other areas, which could also be achieved through proposed mitigation measures.

Due to the agricultural use of the site, there is the potential for contamination on the subject site. An investigation of the site has been undertaken and submitted as part of **Phase 1 Desktop Study**.

The proposed development falls within building height restrictions, however relevant airport authority bodies may need to be consulted of any landscaping scheme to not impact upon airstrikes.

Historical impact, ecology, nature conservation, noise, traffic, sustainable drainage including flooding and sustainable construction, would need to be assessed and monitored during assessing the application and possibly during the duration of the works should planning permission be granted. There are several points which could be suitably addressed through the imposition of conditions should planning permission be granted in the future.

The **Historic Environment Record** indicates that the proposed development lies within a sensitive area of heritage assets. A Heritage Statement has not been supplied. The County Council Archaeology have commented that the area is subject to Historical Archaeological remains. A desk-based study should be submitted as part of the planning application. The details should include construction techniques to be used for the development.

The subject area does not fall within an environmentally sensitive area as outlined in Regulations and supporting guidance. The proposed development is not one with complex and potentially hazardous effects and hence is not considered that it would not have complex, long term or irreversible impacts as outlined in Regulations and supporting guidance for the reasons discussed above.

The potential impact of the development has been considered taking into account of planning policy requirements, which would mitigate the environmental impact. After considering the above factors it is the Council's opinion that the development does not require an EIA provided the measures listed above are undertaken during the designing and construction of the proposed scheme.

The Local Planning Authority has considered the 'selection criteria' in Schedule 3 of the Regulations and has concluded that the proposal would not be likely to have a significant effect on the environment both in isolation and cumulative combination of other committee development.

The above report supersedes the previous one issued. It should be noted that this does not alter the outcome in the fact the EIA is not required for this development but provides clarity and clears up confusion.

Signed: William Allwood Dated: 02 February 2022



Environmental Services Central Operations Temple Quay House 2 The Square Bristol, BS1 6PN Customer Services: 0303 444 5000

Your Ref:

e-mail: <u>Environmentalservices@plann</u>

inginspectorate.gov.uk

Alistair Andrew

Head of Planning Services MAG London Stanstead Airport

Our Ref: S62A/22/5000001

Sent by email

Date: 26 April 2022

Dear Mr Andrew

TOWN AND COUNTRY PLANNING ACT 1990 - SECTION 62A
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017 (SI 571/2017 (THE EIA REGULATIONS')

Applicant: Manchester Airports Group (MAG) and Stanstead Airport Limited (STAL).

Site Address: Land southeast of Stansted Airport, near Takeley, Bishops Stortford.

We refer to your letter dated 06 April 2022 (sent via email on 07 April 2022) requesting a Screening Opinion. The Proposed Development has been screened by the Secretary of State under Regulation 5(6)b and therefore comprises a Screening Direction.

The development proposed, namely a solar farm including battery storage units, with approximately 14.3MW total maximum capacity, is located to the immediate southeast of Stansted Airport, Essex. It falls within the description at 3(a) of Schedule 2 to the EIA Regulations and exceeds the threshold in Column 2 of the table in that Schedule. Having taken into account the criteria in Schedule 3 to the above EIA Regulations, the Proposed Development would not be likely to have significant effects on the environment for the following reasons:

The Proposed Development application site comprises approximately 22.5ha of land currently utilised for arable farming. Stansted Airport lies to the north, with agricultural fields to the east, south and west. The Proposed Development exceeds the applicable threshold of the EIA Regulations as the area of the development exceeds 0.5ha. The site is also located within proximity to 'sensitive areas' as defined in the EIA Regulations, namely two Sites of Special Scientific Interest (SSSI) (Hatfield Forest SSSI and Elsenham Wood SSSI) and two Scheduled Monuments (The Grange and the site of Waltham Hall).

Considering the nature and characteristics of the Proposed Development and the extent of the likely impacts it is unlikely that significant effects on Hatfield Forest SSSI or Elsenham Wood SSSI would occur.

The Proposed Development would not directly impact on the Scheduled Monuments or above ground heritage assets (including the Grade II listed Le Knells Cottage and Grade II listed Old House Farmhouse) but would result in a change to their setting. Whilst there is the potential for adverse impacts, considering the scale of the Proposed Development, the distances involved, and the existing and proposed visual screening, it is considered unlikely that significant effects would occur. Potential impacts from ground disturbance on buried archaeology could be addressed by appropriate mitigation measures (such as further proportionate archaeological investigation during construction).

The Proposed Development has potential to give rise to adverse landscape and visual impacts. Such impacts are likely to reduce over time as the proposed landscaping becomes established. Given the scale, nature and location of the development and proposed mitigation, it is considered that significant effects are unlikely. Although the majority of the site comprises Best and Most Versatile (BMV) agricultural land (Grade 3a), there is no indication that agricultural land is in short supply in the locality and the effects of the scheme are considered to be reversible at the end of the operational life of the Proposed Development. Grazing of small livestock may be able to continue in conjunction with operation of the Proposed Development. It is considered unlikely that the temporary loss of this area of agricultural land would result in a significant effect.

If structures or plant/maintenance facilities are to be located in the area of infilled water features adjacent to McMillan's Engineering to the north of the site, potential risks of contamination could be addressed through localised site investigations and appropriate mitigation measures.

Overall, subject to implementation of appropriate mitigation measures in relation to noise from any piling, to avoid any risks of contamination and to protect archaeological assets and species including badgers and birds, the Proposed Development is considered unlikely to result in significant effects on the environment, either alone or cumulatively with other development.

Accordingly, in exercise of the powers conferred on the Secretary of State by Regulation 5(6) of the EIA Regulations, the Secretary of State hereby directs that this development is not Environmental Impact Assessment (EIA) development.

Under Regulation 28(1) of the EIA Regulations, the relevant planning authority must take steps to secure that this screening direction is placed on the part of the Planning Register which relates to the application.

A copy of this letter will be sent to Uttlesford District Council for information.

Yours sincerely

Richard Hunt

RICHARD HUNT
Operations Lead - Environmental Services
(Signed with the authority of the Secretary of State)

cc: Uttlesford District Council

# Appendix 3 – Frequently Asked Questions and Questionnaire extracts from the dedicated Stansted PV web-site

## Frequently asked questions

How will you ensure the safety of aircraft?

The configuration of the solar farm has been specifically designed to avoid impacting aircraft safety.

A technical Glint and Glare Study has been undertaken to assess the risk of solar glint and glare from the PV arrays, and the possible effects this could have on aircraft and the Air Traffic Control tower. Therefore, the panels in the northern-most part of the site are orientated to face east to prevent reflections towards the ATC tower. The site will be actively managed to ensure that it will not result in additional movements of hazardous birds close to the airport.

Have you considered the impact to the environment?

It is essential that we achieve an appropriate balance between meeting the need for the solar farm development and managing its potential impact on the environment. The environmental effects of the proposed development have therefore been carefully considered through a series of environmental assessments. This has allowed us to effectively understand, minimise and mitigate any potential adverse effects, ensure that appropriate environmental standards have been incorporated into the design of the development and take account of opportunities for environmental enhancements too. The key issues arising from this proposal are addressed in turn below:

Why are using agricultural land?

The proposed location for the solar farm is on land that is owned by Stansted Airport and until recently has been farmed for crop production. In accordance with the national Agricultural Land Classification (ALC) system, approximately 69% of the land within the proposed site is graded as 3a (good quality), 24% grade 3b (moderate quality) and 6% grade 2 (very good quality). It is a relatively modest area of typical boulder clay soils, whereas the surrounding area is dominated by high quality Grade 2 and Grade 3a land. Utilising this site for the solar farm would therefore not have a significant effect on agricultural productivity and would not lead to the permanent loss of its agricultural quality. The operational life of solar farms is

generally time-limited to 25 – 30 years and upon its decommissioning the land has the ability to be restored to its former agricultural use with little or no impact on its inherent quality. We will also explore options for grazing sheep or similar activity as a dual use on the solar farm site to retain an agricultural activity on the site whilst the solar farm is operational.

#### How will this affect the landscape and views?

A Landscape and Visual Assessment of the proposed development has been carried out. The site lies within the Countryside Protection Zone (CPZ) that surrounds Stansted Airport. This is an area designated to protect the open characteristics of the countryside and prevent the coalescence of settlements around the Airport. However, the use of land for a solar farm will not conflict with the aim of the CPZ as it will be integrated within the landscape rather than act to urbanise it and will also be reversable. The development would therefore not lead to coalescence between the Airport and existing development or adversely affect the open characteristics of the CPZ.

To assess the visual impact of the proposed development, a Zone of Theoretical Visibility (ZTV) has been prepared from various viewpoints in the vicinity of the site. This has shown that whilst views of the development to the north and east would largely be contained, there is greater visibility to the south. We will therefore plant trees and hedgerows along the western and southern edges of the solar farm and reinstate the historic field boundary in the centre of the site with a new hedgerow. These landscape enhancements will help to screen the solar farm from view and conserve the character of the local landscape, thereby mitigating any potential visual and landscape effects.

#### How will you protect the biodiversity of the site?

We are designing the scheme with careful consideration to the ecology and biodiversity of the site. A range of ecological and protected species surveys are currently being undertaken to determine any potential impacts to ecological features and protected habitats and species, and to establish any necessary mitigation measures.

We are also proposing a substantial improvement in habitat value and Biodiversity Net Gain on the site, including the protection and enhancement of existing habitats and the creation of new ones such as wildflower meadows, 'bug hotels', bat and bird boxes. These ecological and biodiversity enhancements will be further developed as the design for the solar farm progresses.

There are two local Sites of Special Scientific Interest (SSSIs) located within 2km of the site – Elsenham Wood SSSI and Hatfield Forest SSSI. However, due to the presence of intervening roads and other infrastructure including the Airport itself, the solar farm will not impact on these sites.

Will the solar farm create a flood risk?

The solar farm is not expected to affect flood risk or drainage. The site is located within Flood Zone 1, as shown on the Environment Agency's flood mapping. This means that it has a low probability of fluvial or tidal flooding. The area is also not at any significant risk from surface water flooding, with an annual chance of flooding of less than 0.1%.

We do not anticipate a requirement for the provision of additional drainage because the proposed development only has limited areas of hardstanding and the rain falling on to the panels will naturally run off and percolate into the underlying ground. As such, Greenfield surface water run off rates can be maintained without the need to incorporate specific drainage attenuation features or active drainage systems.

What about local heritage buildings?

The solar farm is not likely to impact upon any nearby built heritage.

The closest heritage assets to the site are two Grade II listed buildings – Le Knells Cottage located to the west on Parsonage Road and Old House Farmhouse located approximately 220m to the south – however it is unlikely that there will be any impact on their physical integrity or setting. Le Knells Cottage is already largely screened from the site by trees, and it is therefore not expected that this property would have a clear line of sight of the solar farm. The enhanced planting that will take place around the perimeter of the site will help to screen direct views to the proposed development from all directions including from Old House Farmhouse.

There are no scheduled monuments in the immediate vicinity of the site.

Will there be disturbance during and after the installation of the solar farm?

In the short term during the construction phase, it will be necessary to transport the manufactured PV panels and other associated equipment to the site using construction vehicles. Although construction traffic movements will be relatively infrequent, deliveries to the site will be managed by a Construction Logistics Plan (CLP). The aim will be to keep construction

vehicle and workforce movements outside of peak travel times to minimise the potential impact that could be experienced on the local road network.

We are developing a Construction Environmental Management Plan (CEMP) to inform and manage the potential construction impacts of the proposed development. This will set out details on how we will manage matters such as construction vehicles, the requirement for a temporary construction compound, minimisation of soil excavation, installation procedures, dust, noise and the protection of existing trees and hedges. We will also implement a Site Waste Management Plan (SWMP) to manage any waste that is generated during construction

Once complete, there will be virtually no traffic associated with the operation and maintenance of the solar farm as it would only require minimal access for occasional maintenance or security purposes.

#### Will it be noisy?

The solar farm will be an inherently passive facility with no moving plant and will therefore have no significant noise or vibration related emissions associated with its operation. The on-site inverters may emit a minor noise, but this is not expected to be discernible due to being positioned centrally within the site, the extensive landscape screening and the considerable distance to the nearest residential property.

Any potential noise and vibration impact from the construction works would be managed through a Construction Environmental Management Plan.

Stansted Airport has objected to other applications for solar farms why is it installing this one?

All development in the vicinity of an officially safeguarded aerodrome is assessed on a case-by-case basis. There are no two sites the same and what we can tolerate in one location may be an intolerable risk to flight safety in another. For solar projects, we have adopted a position where we routinely request aviation perspective Glint & Glare assessments so that we have a robust evidence base upon which to make decisions. Proximity to the runway, the orientation of different facilities and their relationship to flightpaths will all have different effects that need to be individually assessed.

Can you put the solar panels somewhere else e.g., on top of existing building or over a car park?

Sites across the airport estate have been examined for suitability but most have been ruled out because they have an effect on the safe operation of the airport or are uneconomic because of the amount of supporting infrastructure that would be required to support them, such as: car port solutions over surface car parks; requirement to retrofit buildings to cope with the additional wind and weight loadings that would be exerted on roof structures; the need to provide additional sub-stations and providing ducting infrastructure in a busy airport environment.

#### Questionnaire

# Stansted Airport - Solar Farm Consultation

STANSTED AIRPORT SOLAR FARM PUBLIC CONSULTATION

can be found on the Stansted Airport website

renewable energy
1.Do you believe that sourcing renewable energy and reducing carbon emissions is important? $\circ$ Yes
No 2.Do you agree that Stansted Airport should become more self-sufficient in meeting its energy needs?  O Yes
C No

Thank you for taking the time to provide feedback on this proposal. Details of the proposal

Understanding your feelings about climate issues and