Essex County Council
Energy & Low Carbon
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Date: 31/08/2022
Your ref.: S62A/22/0006

FAO Case Officer,

Re: S62A/22/0006 | Development of a ground mounted solar farm with a generation capacity of up to 49.99MW, together with associated infrastructure and landscaping at Berden Hall Farm, Ginns Road, Berden.

Thank you for providing Essex County Council (ECC) with the opportunity to assess and advise on the proposed energy & low carbon strategy/plans for the aforementioned planning application.

Energy & Low Carbon

ECC is committed to taking action on climate change and established the Essex Climate Action Commission (ECAC) in response to national requirements to reduce carbon emissions. The purpose of the Commission includes reducing the carbon footprint of ECC to make Essex a net zero County by 2050, mitigate the effects of climate change, and to explore how we attract investment in natural capital and low carbon growth, including renewable energy. As part of ECC's commitment, proposals to increase the amount of renewable energy generated in Essex that will help to reduce carbon emissions from the electricity grid, whilst also mitigating negative impacts, and maximising positive environmental and socioeconomic impacts are generally welcomed. The ECAC has recommended that '*Essex produces enough renewable energy within the county to meet its own needs by 2040',* with the commission seeing a critical role in this for large scale solar production but "*on available land without unduly compromising agricultural land*". The Planning Practice Guidance (PPG):
'Planning for renewable and low carbon energy' provides specific planning guidance relating to large scale ground-mounted solar farms including the need to make 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. Similarly ECC's position is that solar farms should initially sought to be sited on brownfield, non-agricultural land that is of lower agricultural class (grading of 3b or lower) in order to preserve best and most versatile land for agricultural use. On this basis with regards this proposal and the proposed site being predominantly on grades 2 and 3a agricultural land, ECC cannot support proposals that impact on higher quality land unless the adverse effect of this can be effectively mitigated.

ECC have published, which have been prepared in collaboration with Essex Local Planning Authorities, a set of 'solar farm guiding principles' on ground-mounted solar photovoltaic farms to encourage the highest standards of solar farms. These sit within the Essex Design Guide and can be referred to by Local Authority Officers in preparation of SPDs and other policy documents; referred to as a material consideration in the determination of planning applications and Nationally Significant Infrastructure Projects (NSIPs). These principles can

also be used by developers of solar farms within Essex to inform their plans and proposals. Notwithstanding the above comments on land use, ECC would make the following additional comments on the proposed development which are drawn from the principles;

1. Lifetime emissions from the site should be net zero. Although these sites are generally considered to have a positive impact on emissions reduction because of the production of renewable electricity, there is still the need to ensure that lifetime emissions from the construction, operation and decommissioning of sites are minimised, by for example electrifying the construction and maintenance fleet or by offsetting embedded emissions from the production and construction of the site. All ancillary buildings onsite should also aim to be net zero. Low carbon construction materials and practices should also minimise the carbon footprint of the development e.g. by local procurement and minimising transport of materials; also supporting the local economy and green growth and seeking to maximise social value benefits throughout the project lifetime in procurement, construction and operation processes. Solar developments should also contribute to the greening of the local economy through increasing green jobs, and green sector skills through upskilling their workforce for example, as these skills will be transferable for both large- and small-scale solar installations. This will also support the ECAC recommendation to *"make Essex a centre of innovation for emerging renewable technologies (e.g. small scale nuclear, & manufacturing of renewables products such as solar tiles)"*. As such details of the proposed lifetime emissions of the development and their alignment with net zero standard would be welcome.
2. Neighbouring communities may be impacted by the development and as such it is important that local communities can realise the benefits associated with the project throughout its lifetime through a "community led locality benefit" approach. Developer-led renewable energy infrastructure generation should make a financial or other contribution to the locality, led by the community. The expectation would normally be an opportunity for part community ownership and/or an ongoing community benefit fund that allows local residents to directly benefit from the development and keep more of the value generated by the development in the local economy. As a result of the recommendations made from the ECAC, it is expected that all large-scale renewable energy developments in Essex should include an element of community ownership. We would welcome further details on local benefits from the development.

Yours sincerely,
Kayra Salih,
Energy Efficiency Officer

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