Alternative Sites Assessment.

Land at Stocking Pelham.

On behalf of Low Carbon Solar Park 6 Limited.

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1. INTRODUCTION

Overview

1.1. This Alternative Site Assessment has been prepared on behalf of Low Carbon Solar Park 6 Ltd ('The Applicant'), in support of their planning application for the construction and operation of a renewable energy scheme comprising ground mounted solar photovoltaic (PV) arrays and battery storage with ancillary equipment on agricultural land located near Pelham Substation, Maggots End. The proposal is referred to collectively as the 'Proposed Development' and the project is referred to as 'Pelham Spring Solar Farm'.

1.2. The Proposed Development would provide a clean, renewable and sustainable form of electricity generation directly into the local electricity network. The Proposed Development would add to the District's progress in meeting its renewable energy target and would also assist in meeting national targets for both energy supply and low carbon energy development. The principle of renewable energy, such as solar power, is supported by both local and national planning policy.

1.3. An Agricultural Land Classification survey report has been prepared in support of the planning application that identifies the site to comprise a mix of mostly grade 2, 3a and a small amount of 3b land. As such, the site mostly comprises Best and Most Versatile agricultural land ("BMV land").

Purpose of This Report

1.4. This site search assessment report provides an up-to-date comparative analysis of potential sites that could accommodate the development proposal within a defined area of search1. There is no national or local planning application validation requirements to prepare this assessment and as such it is duly submitted on a without prejudice basis.

1.5. The purpose of the report is to provide a desk top evaluation of any potential alternative sites that could accommodate the development, with focus given to the availability of previously developed land, non-agricultural land or land of lower agricultural grade available within the defined area of search. The report therefore provides justification for using BMV land to accommodate the proposal.

1.6. The assessment set out in this report seeks to identify if there are any potentially more suitable sites situated on:

- Previously developed land and/or non-agricultural land, or;
- Lower grade agricultural land (i.e. Grade 3b, 4 or 5)

[1] Defined by proximity to the point of connection to the electricity grid which has capacity to accommodate the development.

1.7. This assessment is carried out in support of the planning application and seeks to demonstrate that the applicant has given due consideration to the benefits and constraints associated with the proposed site and has considered reasonable alternatives in a proportionate manner. Importantly, it should be noted that there is no statutory or defined policy requirement to carry out an 'alternative site assessment'.

1.8. The remainder of this report is structured as follows:

Section 2 – key features of the site and proposed development;

Section 3 – relevant planning policy;

Section 4 – the methodology applied to identify and assess alternative sites;

Section 5 –assessment of alternative sites; and

Section 6 – summary and conclusions.

2. PROPOSED DEVELOPMENT

The Proposed Site

2.1. The site comprises a collection of medium scale geometrical and irregular fields located at Maggots End, c. 0.8km to the south of Berden, c.1.2km to the north west of Manuden and c. 6km to the north of Bishop's Stortford.

2.2. The fields are generally separated by mature hedgerow and tree planting. There is an ancient woodland called Battle's Wood abutting the site to the east. The northern fields are bound by mature trees and views from the north and west will likely be interrupted by tree cover. The land gently undulates on the sites eastern side. Smaller fields separated by woodland belts are located toward the centre of the site.

The Proposed Development

2.3. The Proposed Development is for the construction, operation, maintenance and decommissioning of a ground-mounted solar farm with battery storage. An operational lifespan of up to 40 years is sought.

2.4. The Proposed Development comprises the construction and operation of a solar PV farm with associated infrastructure.

3. PLANNING POLICY

3.1. The planning policy and guidance most relevant to the consideration of alternative sites in the context of this assessment is considered to comprise the following:

- Uttlesford Local Plan 2005;
- National Planning Policy Framework ('NPPF') (2019);
- National Planning Practice Guidance ('NPPG'); and
- Overarching National Policy Statement ('NPS') for Energy Planning ('EN-1') (2011).

3.2. This report considers policies relating to the use of sites and the consideration of alternative sites only. For further detail to the planning policy and the compliance of the Proposed Development with it, please refer to the Planning Statement and supporting Energy Policy Statement that forms part of the application submission.

Local Planning Policy

3.3. Policy ENV5 (Protection of Agricultural Land) of the Uttlesford Local Plan 2005 sets out that the *"development of 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"*.

3.4. Policy ENV15 (Renewable Energy) states that *"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"*.

3.5. There are numerous other policies at local and national level that relate to specific environmental topics, such as landscape, cultural heritage, ecology, flood risk, and amenity. These policies advocate not locating development on/within designated sites and assets when selecting sites.

National Planning Policy Framework

3.6. The 4th edition NPPF was published in July 2021. The NPPF sets out the Government's planning policies for England and how these are to be applied, including in respect of the development of agricultural land and renewable energy.

3.7. **Paragraph 155** of the NPPF sets out the planning policy perspective with regards to increasing the use and supply of renewable and low carbon energy.

3.8. **Paragraph 174** highlights that new development should be prevented from contributing to or being put at unacceptable risk from, or being adversely affected

by unacceptable levels of soil, air, water or noise pollution or land instability. It identifies how decisions should provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

3.9. Footnote 58 states *"Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality" (our emphasis).* Whilst the guidance sets a clear preference, for using non BMV land, it is also evident that the use on BMV land can be acceptable.

3.10. Annex 2 of the Framework provides a glossary of terms and defines 'best and most versatile agricultural land' as land in grades 1, 2 and 3a of the Agricultural Land Classification.

National Planning Practice Guidance

3.11. The policies contained within the NPPF are expanded upon and supported by the NPPG, which was originally published in March 2014 and has been updated periodically since.

3.12. With regards to the location of solar farms, paragraph 013 (Ref: 5-013-20150327) cites the following factors that local planning authorities should consider:

- 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 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.

4. METHODOLOGY

Overview

4.1. This section sets out the qualitative, sequential methodology utilised to carry out the assessment. It should be noted that this type of methodology has been utilised to support many planning applications relating to solar farms in the UK.

4.2. A phased approach has been developed; the key stages are: -

Stage 1: Developing appropriate site selection criteria reflecting National and Local planning policy and guidance together with operational and developer considerations guiding the locational needs and requirements of the development proposal.

Stage 2: Identify the broad area of search based on the methodology established during stage 1 and identify potential sites for review.

Stage 3: Identification of alternatives sites and, if necessary, measure these against criteria in order to assess if the application site is the most appropriate location for the development. This stage is split into three parts:

- Review and staged sieving of previously developed land (PDL) in order to identify potential sites that would be available and appropriate for the development proposal;
- Review and staged sieving of non-agricultural sites against criteria in order to identify potential sites that would be available and appropriate for the development proposal; and
- Review and assessment of agricultural land. This involves a stage sieving process, starting with the initial identification and preliminary assessment of lower grade agricultural land located within the area of search. If sites are deemed appropriate for further consideration, then they will be assessed against a criteria based assessment in order to assess their appropriateness for the development proposal when assessed against the development site (which is identified as predominantly grade 2 and 3a agricultural land).

STAGE 1

4.3. Reflecting the above, the site selection process is guided by development control considerations laid out through the relevant national and local planning policy guidance together with the operational needs and requirements of the development proposals, these are pulled together and summarised within Table below.

Table 1: Planning, Operational and Developer considerations guiding locational requirements of development proposal.

No.	Issue	Amplification
1	Suitable location which benefits from sunlight intensity levels	Sites should be flat or with a south facing slope and free from structures and trees that could cause shading.
2	A site with suitable grid connectivity	Viable grid connection is an essential material consideration and is instrumental in defining the 'area of search' for alternative sites. The grid connection costs vary dependant on scheme size; grid capacity and local grid infrastructure. Typically; large scale ground mounted solar schemes must be located within circa 4km in order for the scheme to be financially viable. **The area of search is therefore set at 4km from the point of grid connection.** The applicant has secured a viable grid connection offer at Pelham Substation, located approximately 0.5km to the north west of the site. The 4km range typically applies when there are no physical impediment which prevents a direct (or near direct) cable route running from the development site to point of grid connection. For example, a site within 1km of the point of grid connection may prove to be unviable if there are physical or legal obstacles to negotiate (such as directing a cable run through a residential estate; under a river; under a railway or major road or lack of easements over land etc).
3	A site of a suitable shape, orientation and size that can accommodate the development proposal	Circa 50 hectares is required to deliver a 40MW scheme. This size requirement only applies when the site is characteristically clear of obstructions (or can be made clear of obstructions) and benefits from a level or gentle sloping topography. Importantly: - i. Where potential sites are subject of physical obstructions which cannot be removed (such as public footpaths, historical field boundaries, woodland, rivers, streams, highways etc.) the site area requirement is increased, where there is more than one constraint the development footprint can be significantly increased. Additionally, a site positioned within the rolling countryside, which is characteristic of the wider locality, would often require a greater

		development footprint. A combination of both the physical and topographical constraints would further increase the area requirements. ii. The fragmentation of the development site would have an adverse effect towards a scheme's viability and deliverability. Furthermore, it would significantly increase the size of the development footprint. Accordingly, the focus is on delivering a single scheme as opposed to several smaller schemes which collectively total c. 40MW. Two or three separate sites cumulatively delivering 40MW at this location would be unviable since each scheme would generate additional infrastructure and create unviable costs associated with grid connection and easements over land etc.
4	Topography	The preference is for a site with a southerly aspect; however; northerly aspect sites cannot be dismissed. The outcome of selecting a site with a northerly aspect would be a need to increase the overall development footprint of the scheme (operational need to increase the distance between the arrays in order to avoid overshadowing of modules).
5	Previously developed land and non-agricultural land	The Planning Practice Guidance on Renewable and low carbon energy encourages the effective use of land by sequentially focussing large scale solar farms on previously developed and non-agricultural land, then agricultural land (lower quality then higher quality). Re-using previously developed land / non-agricultural land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used. Based on this definition, this criterion involved consideration of whether a site could properly be categorised as previously developed land and/ or non-agricultural land.
6	Agricultural land classification	Ground mounted solar parks are temporary structures and as such they do not lead to the sterilisation of agricultural land. Accordingly, unlike residential development or other renewable energy proposal (such as energy from waste plants) they do not constitute significant, permanent development resulting in the loss of agricultural land.

		For ground mounted solar parks the PPG on Renewable Energy sets out a site identification system whereby preference is given to the use of poorer agricultural land quality (grades 3b and 4) before higher land quality agricultural land (grades 1, 2 and 3a). Sites entirely within Best and Most Versatile Land (BMV) should only come forward and be considered when there are no other sites available which either entirely or proportionately comprise 'poorer land quality'. However, it is also important to recognise that the NPPF deals with the use of non BMV as a 'preference', and this consideration must be assessed in the context of other planning policy and material planning considerations.
7	Sensitive areas as defined by the EIA regulation	The EIA regulations define sensitive areas as including land notified under section 28(1) (Sites of Special Scientific Interest) of the Wildlife and Countryside Act 1981(21); a National Park within the meaning of the National Parks and Access to the Countryside Act 1949; the Broads; a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention for the Protection of the World Cultural and Natural Heritage; a Scheduled Monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979; an Area of Outstanding Natural Beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000(26); a European site within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2010(27). The NPPF and Development Plan seek to steer development away from the sensitive environmental sites.
8	A suitable location which is served by appropriate highway infrastructure	Appropriate highway infrastructure is a material consideration due to the (HGV) Heavy Goods Vehicles traffic trips generated during the construction period.
9	A suitable site which is available for the duration of the development proposal	The site must be available for the duration of energy generation requirement of 40 years and preference is for a site within single ownership. This will give confidence to applicant, local community, developer and local planning authority that the scheme can be delivered, maintained and decommissioned.

10	Site specific allocation	Consideration should be given to the planning vision for the site as presented within the extant and emerging development plan. For example; use of land safeguarded for amenity use or allocated for housing would be inappropriate and generate a policy conflict within the extant and emerging development plan. Furthermore, economic justification would be required for the change of use of land allocated for employment / industrial uses
11	Flood risk	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere (extract from NPPF para 100). Solar panels are categorised as water compatible. However, the ancillary components (such as Inverters and Substations) are not water compatible. Accordingly, whilst it is acceptable for part of the site to be located within a higher flood risk zone; locating entire sites within such zones should be avoided.
12	Sensitive human receptors	This criterion requires an assessment of how the proposed development would relate to potentially sensitive human receptors on the site and in relation to neighbouring land uses including proximity to populated areas and or local villages.
13	Landscape and visual considerations	The landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. Government guidance promotes good screening of sites.
14	Heritage considerations	Proposals should demonstrate that no substantial harm is caused to heritage assets; where there is an impact on heritage assets relevant mitigation measures should be considered to lessen impact.

4.4. Accordingly, the purpose of the alternative site search is to:-

- Firstly, identify any previously developed land available to accommodate the proposal within the defined search area. If more than one PDL site is identified then the criteria applied above will be used as a sieve to identify the most suitable brownfield land to accommodate the development proposal.

- Secondly, where no suitable brownfield sites are identified, the assessment will continue to review non-agricultural sites located within the defined search area. If more than one non-agricultural site is identified then subject to their availability, the criterion set out above will be used to sieve out the most suitable non-agricultural land.

- Thirdly, where no suitable non-agricultural sites are identified, the assessment can move forward to consider agricultural land. If more than one agricultural site is identified then the criteria set out above will be used to sieve out the most suitable site occupying agricultural land.

4.5. The numeric system of scoring which will be applied to the assessment criteria is presented below.

Table: Scoring Matrix

Negative context (low score)	**Scoring**					**Positive context (high score)**
Unviable grid connection	1	2	3	4	5	Viable grid connection
Size not adequate	1	2	3	4	5	Size adequate
Unsuitable topography	1	2	3	4	5	Suitable topography
Greenfield site	1	2	3	4	5	Previously developed land / Non-agricultural land
Best and most versatile agricultural land (BMV)	1	2	3	4	5	Not BMV (poorer quality land)
In sensitive area as defined by EIA Regs	1	2	3	4	5	Not in sensitive area as defined by EIA Regs (for example a site within the AONB would be given a 1 rating)

Poor highway infrastructure	1	2	3	4	5	Good highway infrastructure
Land not available	1	2	3	4	5	Land available
No relevant site specific allocation	1	2	3	4	5	Site specific allocation for development proposal
Land within flood zone 3 (high risk of flooding)	1	2	3	4	5	Land within Flood Zone 1
Sensitive human receptors	1	2	3	4	5	No sensitive human receptors surrounding the site
Development not screened by landscape	1	2	3	4	5	Development site screened by landscape
In proximity to heritage assets	1	2	3	4	5	Not in proximity to heritage assets

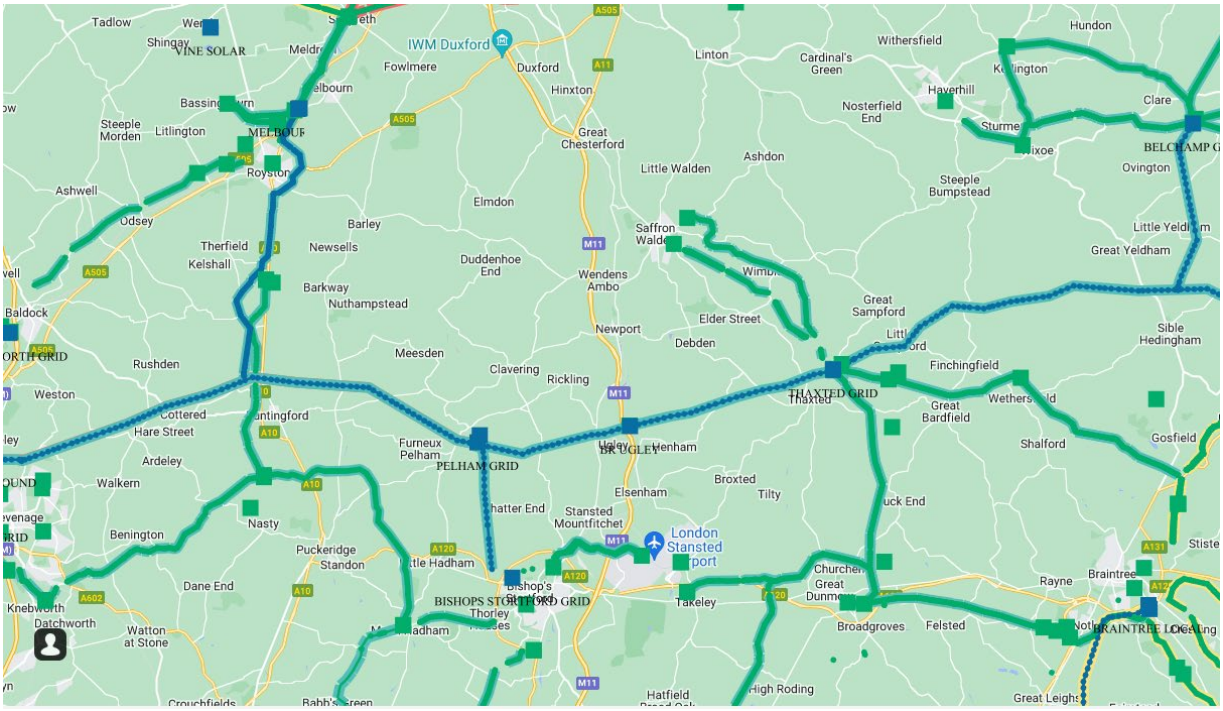
5. ASSESSMENT OF ALTERNATIVE SITES

Stage 2: Defining the Search Area

5.1. One of the biggest constraints which has to be considered when developing a ground mounted solar scheme is gaining access to the local electricity grid, via an offer of a grid connection. Without such an offer, a solar farm simply cannot be developed. As stated elsewhere in this report, a site should be reasonably located to its point of connection to the electricity grid and this should be up to 4km away.

5.2. Accordingly, all ground mounted solar searches start with grid proximity and capacity availability with the incumbent, as this determines where a solar park can connect to the National Distribution Grid. This was achieved in relation to this site by first working with the Distribution Network Operator (DNO), in this case UK Power Networks, to establish where it is possible to connect to the local grid network, followed up with a grid application to secure connectivity.

5.3. As evidenced by the UK Power Networks Heat Map below, the existing distribution grid within Uttlesford District has a number of lines where a grid connection can be possible. However, the fact that the solar farm must be within 4km of a suitable connection point renders large areas of the District unsuitable.



5.4. It should also be noted that the process of securing a viable grid connection is difficult and time consuming and National Grid carefully manages the process of granting a 'grid offer'. These offers are made within the constraints of the capacity of the local grid and offers are time limited, to ensure that additional capacity does not become locked into the system, but never delivered.

5.5. Low Carbon has obtained a grid offer for a connection from the Pelham Substation and it is therefore considered that the solar farm is entirely reliant upon this grid connection, and the search area should comprise a 4km radius from the point of connection. However, for completeness, and to demonstrate flexibility, site availability in the wider District has been considered.

5.6. The image below shows a 4km radius (yellow line) from the Pelham substation (yellow pin). The site is shown outlined in red.

Stage 3a: Review of Previously Developed Land

5.7. As suggested by the Planning Practice Guidance, the applicant has considered the availability of previously developed land and non-agricultural sites within the search area.

5.8. Firstly, commercial rooftops have not been considered because:

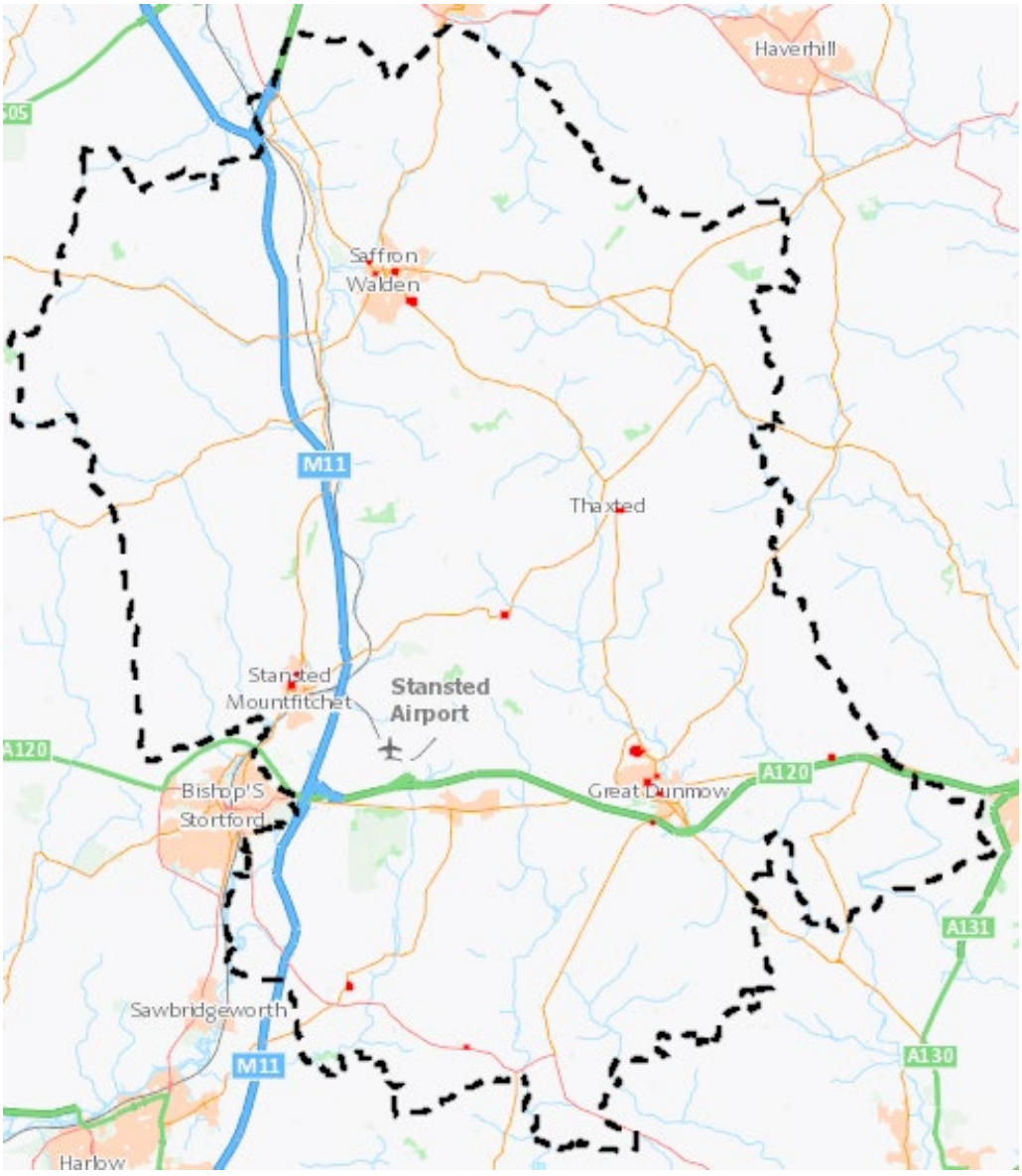
- There are no known rooftops of sufficient size in the local area;

- It is considered that assessing the potential for development of multiple rooftops is not comparable to a ground-mounted solar PV farm; and,

- Furthermore, paragraph 013 (REF:5-013-20150327) in the Government's National Planning Practice Guidance states that in considering ground-mounted solar farms, the focus should be on the effective use of previously developed land and non-agricultural land. Rooftops are not mentioned.

5.9. The Uttlesford District Council Brownfield Register has been reviewed. The brownfield land register is a list of previously development sites in the District that the Council have assessed as being suitable for housing. The register identifies 20 such sites. 19 of these are 'deliverable' and are identified on the plan below. Carver Barracks, which is currently 'undeliverable', is not shown on the map but is expected to accommodate residential development in the future.

Extract map from Uttlesford District Council Brownfield Register



5.10. There are no brownfield sites within the search area.

5.11. In any case, only the Carver Barracks site near Debden is potentially large enough to accommodate a solar farm, but it is understood that the site is not currently available and will be utilised for future housing. The site also falls outside the area of search.

5.12. None of the other sites are large enough to accommodate a solar farm, all being less than 1 hectare in area with the exception of the Helena Romanes School (3.57 ha) which is not large enough and is understood to comprise a fully operating school.

5.13. A desktop search has also been undertaken to identify any additional brownfield sites over 10 hectares, within 5 miles of Pelham Substation (i.e. a wider area than the search area). The search was carried out using internet resource (namely the 'Property Link', the UK's commercial property listing site managed by the Estates Gazette). No brownfield site over 5ha was identified in the search. One site (4.8ha) at Bishops Stortford has planning permission for a data centre. It is therefore too small and also unlikely to be commercially viable because the site would be too expensive to rent given its planning permission and development potential, plus the site is only being marketed as available for sale.

APPENDIX 1: BROWNFIELD LAND SEARCH

5.14. From the above, it is clear that there are no brownfield sites available to accommodate the proposal within the area of search, as defined by a 4km radius from Pelham substation (or indeed, in the District).

5.15. For the purpose of this alternative site search assessment it is therefore demonstrated that non-agricultural land or agricultural land is required to accommodate the application proposal.

Stage 3b: Review Of Non-Agricultural Land

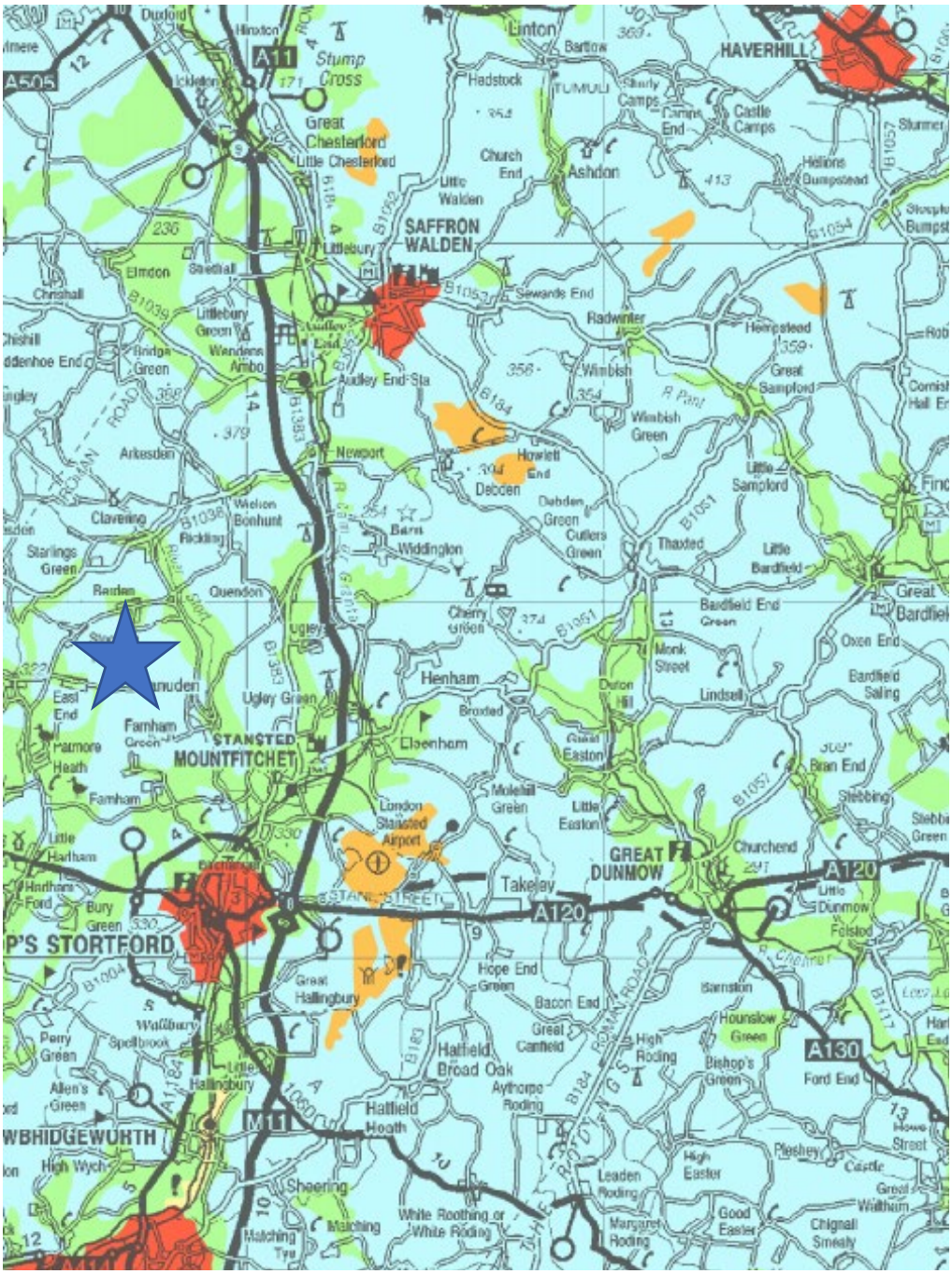
5.16. Due to the lack of available brownfield sites to accommodate the development proposal within the defined area of search, it has been demonstrated that either non-agricultural land or agricultural land is required to accommodate the development proposal. Consideration is firstly given to non-agricultural land.

5.17. The Framework does not provide a definition of the term 'Non-agricultural land'. A definition of non-agriculture is provided through '*The Agricultural Land Classification of England and Wales Revised guidelines and criteria for grading the quality of agricultural land*' (published 1988). It defines non-agriculture as:- ***'Soft' uses where most of the land could be returned relatively easily to agriculture, including: golf courses, private parkland, public open spaces, sports fields, allotments and soft-surfaced areas on airports/ airfields"***.

5.18. Natural England's provisional agricultural land classification map identifies areas of non-agricultural land (shown dark orange on the extract map below). The only areas of non agricultural land are:

- RAF Debden/Carver Barracks;
- Hatfield Forest;

- Stansted Airport
- Woodland South of Carver Barracks;
- Woodland north of Radwinter;
- Chesterford Research Park and
- Woodland east of Hampstead.



(Extract from Natural England Agricultural Land Classification Map Eastern Region (ALC008))

5.19. None of these sites are considered suitable locations for the proposed solar farm. The loss of significant areas of woodland would be contrary to local planning policies and likely to result in significant harm to the landscape. As previously identified, land at Carver Barracks is not available, and is likely to be developed for housing in the future.

5.20. It is clear that there are no non-agricultural sites available to accommodate the proposal within the area of search, as defined by a 4km radius from Pelham substation, or indeed within the District as a whole.

5.21. For the purpose of this alternative site search assessment, it is therefore demonstrated that agricultural land is required to accommodate the application proposal.

Stage 3c: Review of Agricultural Land

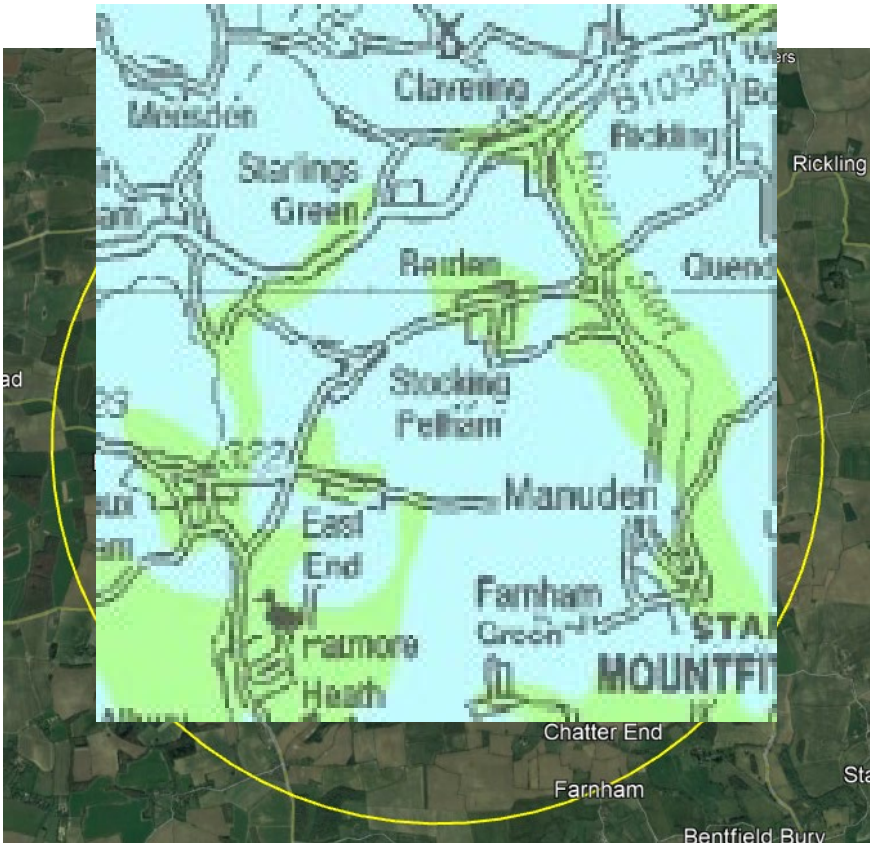
5.22. National guidance states that local planning authorities could give consideration to whether there are any areas of non-agricultural land that could be used in preference to higher quality land; when such land has been discounted consideration can then be given towards the use of agricultural land of poorer land quality in preference to higher quality land.

The Search Area

5.23. As has been stated above, the applicant considers that the search area should reasonably relate to a 4km area from the grid connection point. This is on the basis that a grid connection is fundamental to the solar farm, and given the lack of grid connections points that are available from National Grid.

5.24. This report therefore considers the viability of non BMV land in the 4km radius search area.

5.25. The overlay images below demonstrate that there is no poorer quality agricultural land available in the search area.

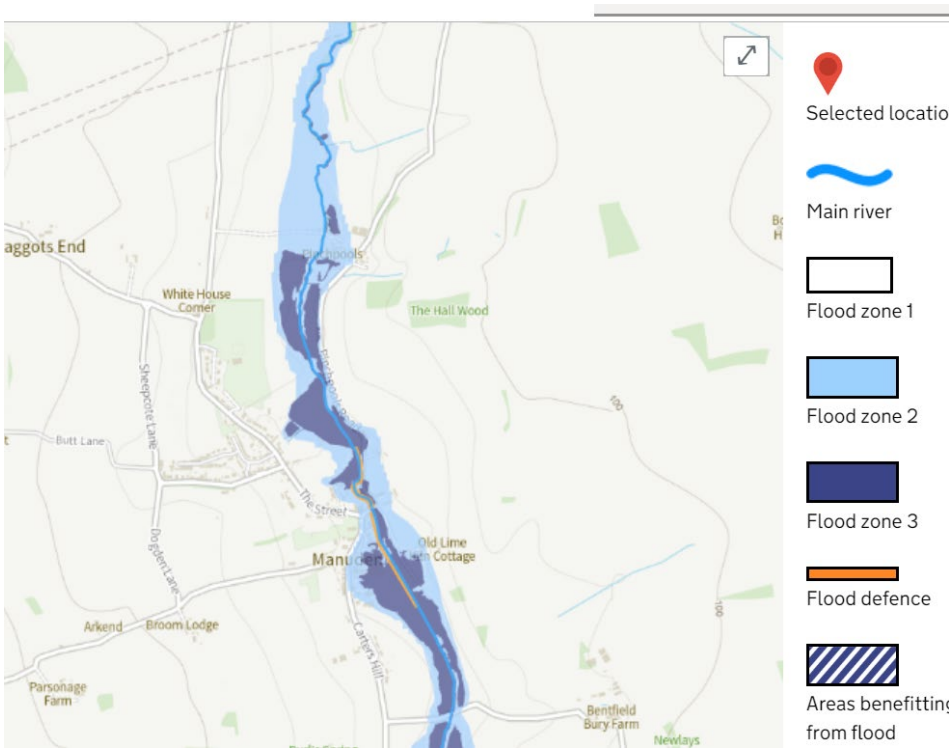


Rough Overlay of the 4km Searcg Area and the Provisional Land Classification of the Site Search Area

5.26. Firstly, it should be noted that all land in the search area is grade 2 or 3. The grade 3 land that is in the area, sits within a substantial area of grade 2 land. It is therefore very possible that the undifferentiated grade 3 land does contain grade 3a BMV land, or higher.

5.27. It would not be proportionate, reasonable or indeed commercially possible to require the applicant to undertake detailed soil surveys of all the grade 3 land in order to establish its precise grading. In any case, the main two areas of grade 3 land that fall in the search (land running north to south along the River Ash (west side of search area), and land running north to south along the River Stort (east side of search area) are not suitable for the following reasons.

5.28. The Provisional grade 3 land following the River Stort and Manuden Road is effectively divided by these geographical features, which means that both access and finding a site of sufficient size is very difficult. Areas of flood zone along the River Stort, although not large (see image below), do create a further constraint. In addition, some of the land is adjacent to the village and is therefore not considered to be suitable.



Flood zone along River Stort

5.29. To the south west of the search area, land at Graves End is shown as grade 3. However, this broadly relates to Patmore Heath Nature Reserve and woodland to the east of the nature reserve (see image below). As such, this land is not suitable for a solar farm.

Land near Patmore Heath Nature Reserve

5.30. It has therefore been demonstrated that there is no lower quality agricultural land available in the search area.

5.31. For this reason, there are no alternative agricultural sites of non Best and Most Versatile land to test against the application site, in terms of the scoring matrix referred to in section 4.

Wider Local Authority Area

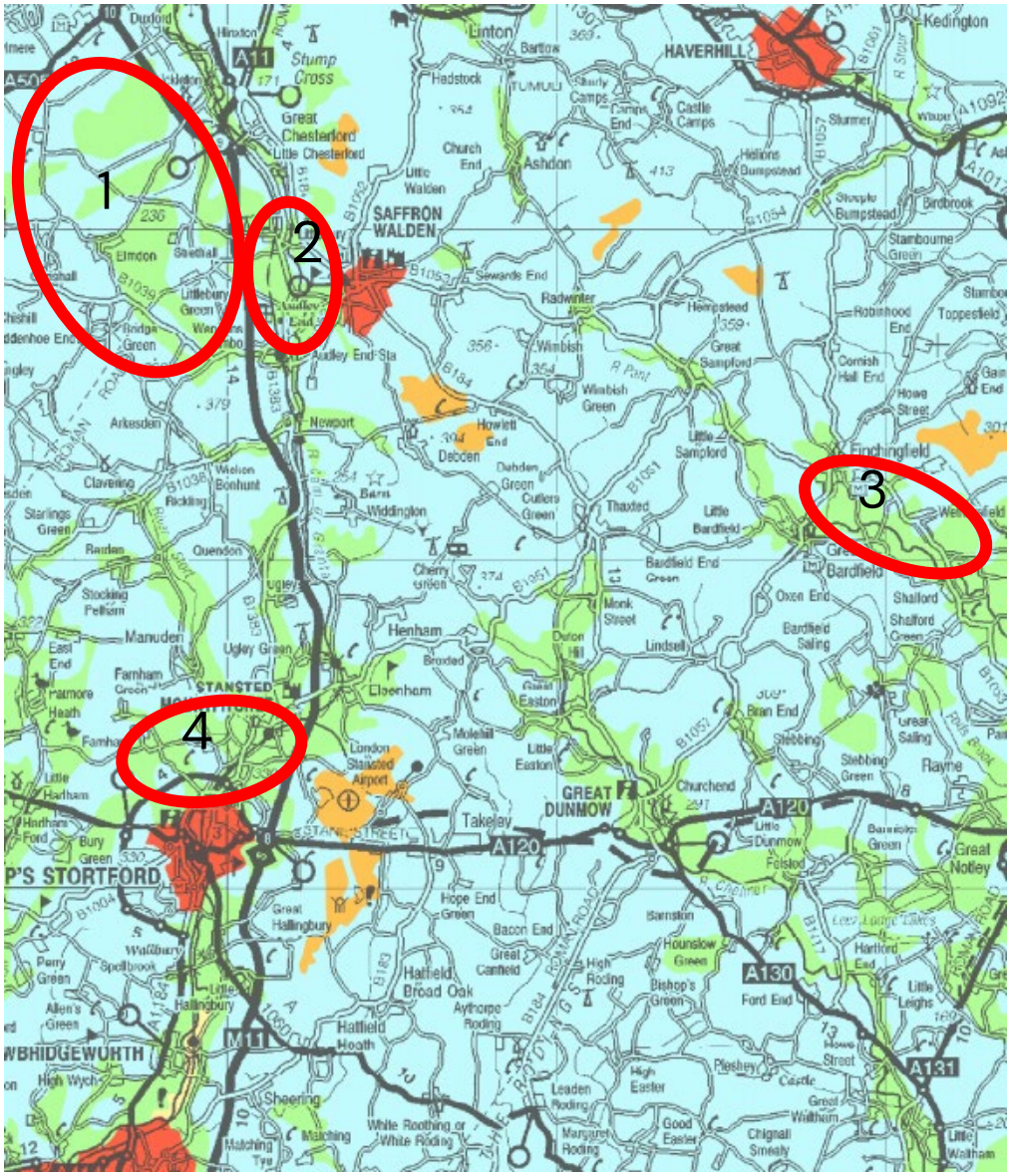
5.32. Whilst the applicant considers a 4km radius of the grid connection point to be a reasonable and proportionate basis for the consideration of alternative sites, we have nevertheless considered the context of the availability of non BMV land in the District, which further lends support for the use of BMV land.

5.33. As can be seen from the agricultural land classification map extract below, the strategic provisional land grading for the majority of the District is grade 2 agricultural land (sky blue colour).

5.34. There are some areas of undifferentiated grade 3 land, but these are likely to contain areas of grade 3a BMV land. The probability of this is considered to be high, given that there is a high propensity for grade 2 BMV land in the District. Importantly, there are no areas of poorer quality grade 4 or 5 agricultural land within the search area.

5.35. With regard to the undifferentiated grade 3 land, the only way to accurately determine the agricultural grade of the land is by undertaking a detailed field survey (as has been done with the application site). With regard to national planning guidance concerning proportionality, it would be unreasonable and unfeasible to test the soil of all areas of grade 3 land.

5.36. We have however considered the larger areas of Grade 3 land in the District. The image below shows 4 main areas where Grade 3 land is concentrated. These are considered below.



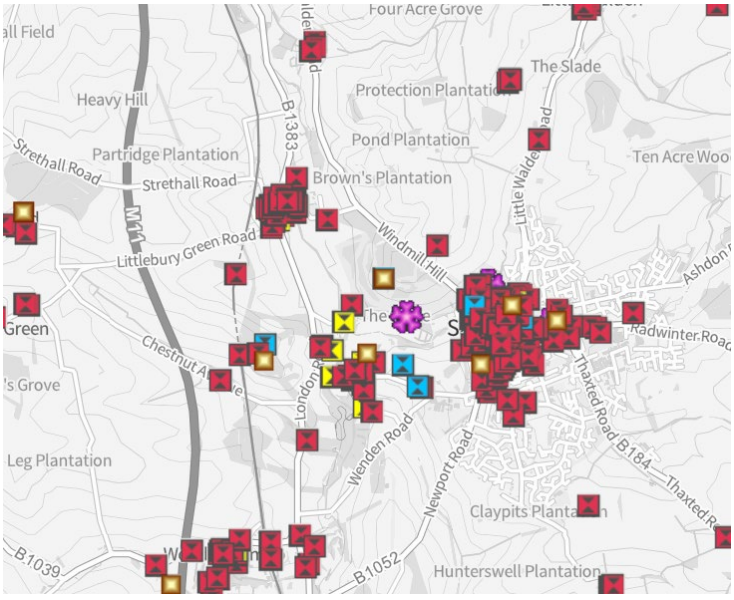
Sub Area 1- Land south of Duxford

5.37. As the extract from the power lines map below demonstrates, this area is too far from the grid for a viable connection, and major roads including the M11 and the A505 further remove any potential of a viable connection to a grid point from this area of land. This area is therefore unsuitable.

Sub Area 2- Land west of Saffron Walden

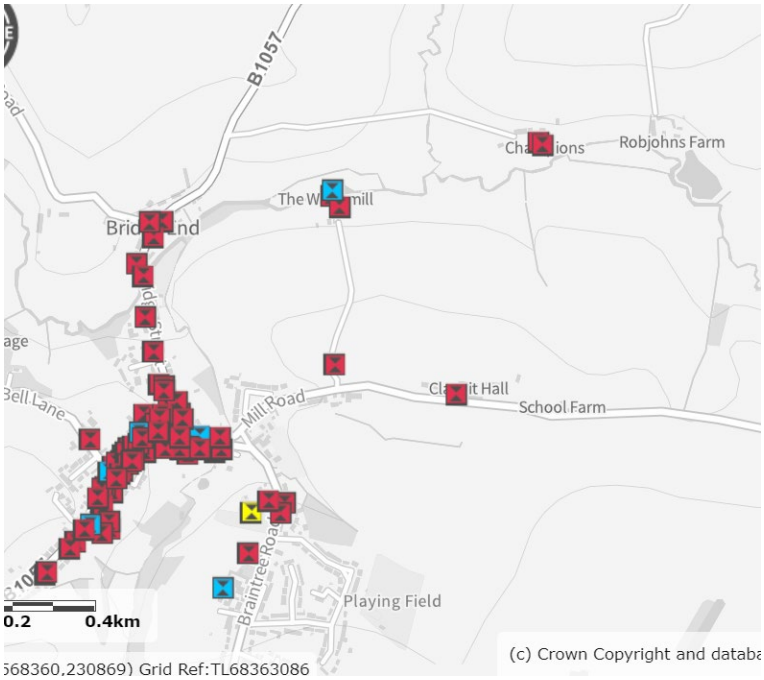
5.38. The area forms land that is part of and near to Audley End, which is a registered 'Park and Garden'. There are also numerous Listed buildings and Scheduled monuments nearby.

5.39. Also, gaining access to a grid connection point to the east of Saffron Walden (assuming that there is even a grid connection available) would be commercially unviable because it would involve crossing a very large number of third party land ownerships. It is unsuitable therefore.



Sub Area 3- Land North East of Great Bardfield

5.40. This land is close to the settlement of Great Bardfield, where there are a number of listed buildings, including mills. The nearby listed buildings are shown below.



5.41. In addition, the land is subdivided by watercourses that run north to south and east to west, making it difficult to access and form a site of sufficient size.

5.42. Moreover, this land is again grade 3 land, sitting in substantial area of grade 2 land. It is therefore very likely that the site does contain grade 3a land.

Sub Area 4- Land South of Stansted Mountfitchet

5.43. This area of land is within the Green Belt., where development is generally considered to be inappropriate. Planning policy therefore directs development away from this area.

5.44. Again, the grade 3 land is likely to contain grade 3a land.

5.45. In summary, there are no areas of non BMV land in the District that are clearly or obviously more suitable for solar development than the subject site.

6. SUMMARY AND CONCLUSIONS

6.1. The specific land-take and land characteristics guiding this large scale ground mounted solar park makes the application site the sequentially preferred site within the defined area of search. The alternatives site search report has established: -

- There are no brownfield sites of adequate size that can accommodate the proposal.
- There are no 'non-agricultural' sites available to accommodate the application proposal.
- The provisional agricultural land classification map shows no areas of lower grade land (grade 4 or 5) within the area of search.
- There is limited grade 3 land available in the area of search. It would be unreasonable to test all of these areas to establish whether any areas contain grade 3b, non BMV land.

6.2. Overall, no reasonable alternative sites of appropriate size have been identified which could accommodate the development proposal within 4km of the point of connection. Accordingly, there is no alternative which would be capable of delivering similar benefits.

6.3. Consideration at a wider District level has also found no evidence that a suitable area of lower quality non-BMV land exists.

6.4. Importantly, it is not for the applicant to disprove its own case as to why the subject application site has been selected. Nor or is it the case that the applicant must consider ever piece of agricultural land in the District. Rather, this report demonstrates that a proportionate and diligent approach has been adopted by the applicant to site selection.

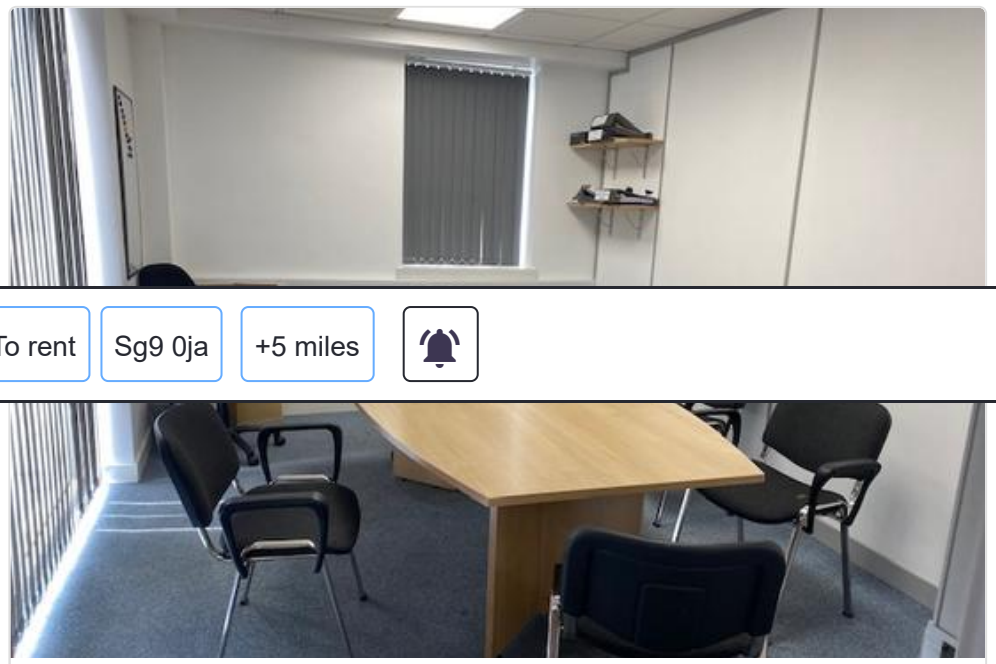
6.5. This report demonstrates the robust approach taken, and supports the applicants position that the use of BMV Land at this site, is necessary.

6.6. The Planning Statement explains how the use of the BMV land must be considered in context in any case. For example, the temporary nature of the proposal, its reversibility at decommissioning , the support for renewable energy and the energy and cost of living crisis are all material considerations that outweigh the temporary non-use of the BMV land.

Appendix 1 – Brownfield site search

5 commercial properties for rent in SG9 0JA

To rent | Sg9 0ja | +5 miles | Most recent



A large, self-contained...

TO RENT
£29,950.00 Per Annum

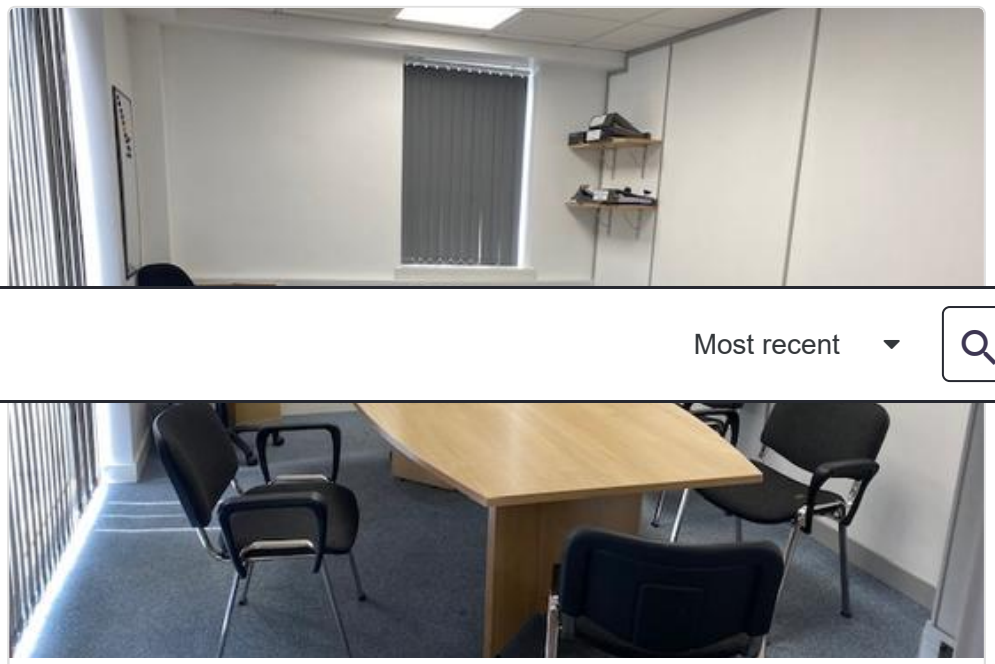
SIZE
2,802 Sq Ft

ADDRESS
Suite C, Unit 1 Birchanger Estate, Stansted Road...

TYPE
Office, Offices

CokeGearing consulting Chartered Surveyors

Email agent



A large self-contained...

TO RENT
£29,950.00 Per Annum

SIZE
2,802 Sq Ft

ADDRESS
Suite C, Unit 1 Birchanger Estate, Stansted Road...

TYPE
General Retail, Retail

CokeGearing consulting Chartered Surveyors

Email agent

TO LET – CHARACTER...

TO RENT
£14,500.00 Per Annum

SIZE
1,061 Sq Ft

ADDRESS

TYPE

Retail and cafe/restaurant units...

TO RENT
ROA

SIZE
1,271 - 10,409 Sq Ft

ADDRESS

TYPE

The Old Dairy Office, Rickling Hall, Saffron...

Office, Offices

Email agent

Stortford Fields, Western Neighbourhood...

General Retail, Retail

Email agent

Be the first to see SG9 0JA properties

Create search alert

Map view

Ground Floor, Unit 1, Riverside...

TO RENT

£8,400.00 Per Annum

SIZE

295 Sq Ft

ADDRESS

Ground Floor, Unit 1 Riverside Business Park...

TYPE

Office, Offices

Email agent

Popular property searches

Commercial land for sale in London

Restaurants for rent in London

Commercial property for sale in London

Warehouses for sale in London

Retail properties for rent in London

Serviced offices for rent in London

About EG

Useful links

For sale | Sg9 0ja | +5 miles

Most recent

1 commercial properties for sale in SG9 0JA

Bury Green, Little Hadham...

FOR SALE
POA

SIZE

ADDRESS
Bury Green, Little Hadham, Bishop's Stortford, SG11...

TYPE
General Industrial, Land, Industrial, Commercial Land

Colliers

Email agent

Map view

Popular property searches

[redacted]

EG products

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Useful links

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Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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