



DESIGN AND ACCESS STATEMENT

PELHAM SPRING SOLAR FARM

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ON BEHALF OF LOW CARBON SOLAR PARK 6 LIMITED

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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1. INTRODUCTION

- 1.1 This Design and Access Statement accompanies a full planning application submitted by Pegasus Group on behalf of Low Carbon Solar Park 6 Limited ('The Applicant'), a special purpose vehicle of Low Carbon Ltd, to The Planning Inspectorate under provisions of Section 62A of the Town and Country Planning Act 1990 for the development of a ground mounted solar photovoltaic (PV) arrays and associated infrastructure on land near Pelham Substation. The proposal is referred to collectively as the 'Proposed Development' and the project is referred to as 'Pelham Spring Solar Farm'.
- 1.2 The main element of the proposal is the construction, operation, maintenance and decommissioning of up to a 49.99 megawatt (MW) ground mounted solar farm with battery storage and associated infrastructure.
- 1.3 This application forms a resubmission of a previously refused scheme (ref: UTT/21/3356/FUL) which was submitted to Uttlesford District Council in November 2021 and subsequently refused on 24 January 2022. The application was determined by the Council within the statutory 13-week period. A number of holding objections subject to requests for further information were raised by statutory consultees during the determination period, however, the Council did not allow an extension of time to provide the requested information.
- 1.4 The proposal would provide a clean, renewable and sustainable form of electricity and will also make a valuable contribution to the generation of electricity at a local level. The scheme would add to Uttlesford District Council's progress in meeting its renewable energy target, adopted following their climate emergency declaration in August 2019, and would also assist in meeting national targets for both energy supply and low carbon energy development.
- 1.5 This Design and Access Statement should be read in conjunction with the accompanying Planning Statement which sets out the planning policy context relating to the design and access issues of the application proposal. Notwithstanding the above, this design and access statement is set out to be read as a standalone document if required.
- 1.6 This document has been prepared in line with Section 4(3) of the Town and Country Planning (Development Management Procedure) (England) (Amendments) Order 2013, which sets out the requirements regarding the contents of a Design and Access Statement.

- 1.7 The overarching objectives of the development proposal are to meet the objectives of climate change and energy security.

2. THE 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 layout of the solar farm arrays, associated structures and proposed planting will be located entirely within the administrative area of Uttlesford District Council and is not located within the Green Belt.
- 2.3 The application site falls across two parish councils. Most of the site, comprising the southern section, is located within the Manuden Parish. The northern part of the site is located within Berden Parish.
- 2.4 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.
- 2.5 The nearest residential dwellings to the site is that of the Battles Hall Farm and barns approximately 0.1km to the south east and Brick End approximately 0.1km to the west. Other dwellings are located in Berden (c.0.8km), Manuden (c.1.2km), East End (c. 1.2km), and Stocking Pelham (1.7km). The area can generally be characterised as open countryside.
- 2.6 The Development is proposed to connect to Pelham substation, located approximately 0.4km west of the site, via an underground cable which will extend westwards from the solar farm before connecting into the substation from the south. The route of the proposed cable route will be subject to a separate planning application to be submitted to both Uttlesford District Council and East Hertfordshire Council in the future.

3. DESIGN APPROACH

3.1 This section sets out the approach that the applicant has taken through the design of the Proposed Development and how the design has evolved through the pre-application process.

3.2 The main design principles adopted by the Applicant are set out below:

- Design Principle 1: position the main components to minimise environmental impact;
- Design Principle 2: seek opportunities for the management and enhancement of biodiversity;
- Design Principle 3: provide a functional design that makes the best use of the location and provides for efficient generation of electricity;
- Design Principle 4: seek to assimilate the Proposed Development into the local landscape as far as possible;
- Design principle 5: ensure safe and efficient access to the public highway;
- Design Principle 6: ensure the approach to design is inclusive; and
- Design Principle 7: seek to minimise any impact of the development on the historic built environment

3.3 In addition to the principles outlined above, the design of the proposal has been developed primarily from five sources; the physical opportunities and constraints the site provides; the physical needs of the development itself; the policy context which surrounds the development; and the technical design comments and advice put forward by the Applicant, the Local Planning Authority and wider consultant team.

3.4 The following constraints and opportunities have been identified:

Development Constraints

- Appropriate design and siting required to take account of established built form and surrounding heritage designations.
- Need to ensure visual amenity is not significantly detrimentally affected from any nearby residential receptor.
- Proximity of site to an Ancient Woodland adjacent to the east boundary.
- Proximity of PRoWs both within and surrounding the site.

Development Opportunities

- Land take requirement – the site is an appropriate size for the development proposal and ensures appropriate access to all surrounding fields outside the red line boundary is maintained to ensure ongoing farming of surrounding land is not adversely impacted by the development.
- Access to the application site during the construction phase will be served by a temporary vehicular access via an existing field access point directly from Manuden Road, opposite the entrance to Pinchpools Farm.
- The site itself is not subject to any environmental designations.
- Biodiversity net-gains – The proposal would present opportunities to introduce biodiversity enhancement measures which will provide significant benefits for a diverse array of native wildlife for a 40 year period such as invertebrates; small mammals; larger mammals; and birds.
- Sunlight intensity levels – the site is well located geographically for solar gain and is relatively flat and is free of any buildings or landscape features that could cause overshadowing.
- Proximity to a viable grid connection – the substation at Pelham Spring represents one of few opportunities currently in this area for new generation to be viably connected into the distribution network (maintained by UK Power Networks).
- The proposal will contribute to the provision of renewable and low carbon energy, thus helping to decarbonise the energy sector and achieve both

national and local (Uttlesford DC) renewable energy and carbon net zero targets.

3.5 Given the site's context, the proposed development has been designed to be sympathetic to its surroundings (in accordance with Design principles 1, 2, 4 and 7), whilst being practical in terms of technical and engineering considerations (in accordance with Design Principles 3 and 5).

3.6 Key elements of the design approach have included the following:

- Preserving existing trees, hedgerows, woodland and ecological features both within and in close proximity of the site where possible (in accordance with Design Principle 2).
- Orientating the solar panels south to benefit from maximum solar irradiation (in accordance with Design Principle 3)
- Upgrading of existing field access points with improved visibility splays (in accordance with (Design Principle 5)
- Providing extensive additional hedgerow and tree planting, including where there are currently gaps or no vegetation, to screen the development and minimise the visual impacts of the proposed development on surrounding sensitive receptors, including nearby residential dwellings, PRoWs and heritage designations (in accordance with Design Principle 3 and 7)
- Providing significant habitat improvements within the site, including the conversion of arable farmland to higher value grassland, the provision of wildflower meadow along field margins and the provision of new hedgerows and trees (In accordance with Design Principle 2)

3.7 The infrastructure related to the Proposed Development is functional in appearance and has been situated in such a way to avoid any environmentally sensitive areas and mitigation has been included to reduce any other impacts. For example, gaps of between 5 and 10m have been retained from any existing mature field boundaries, and well in excess of 15m (approximately 30-50m) adjacent to the ancient woodland.

3.8 The approach that has been taken to the design of the Proposed Development is considered appropriate given its context and purpose to generate and export electricity to the local distribution network.



Design Through Consultation

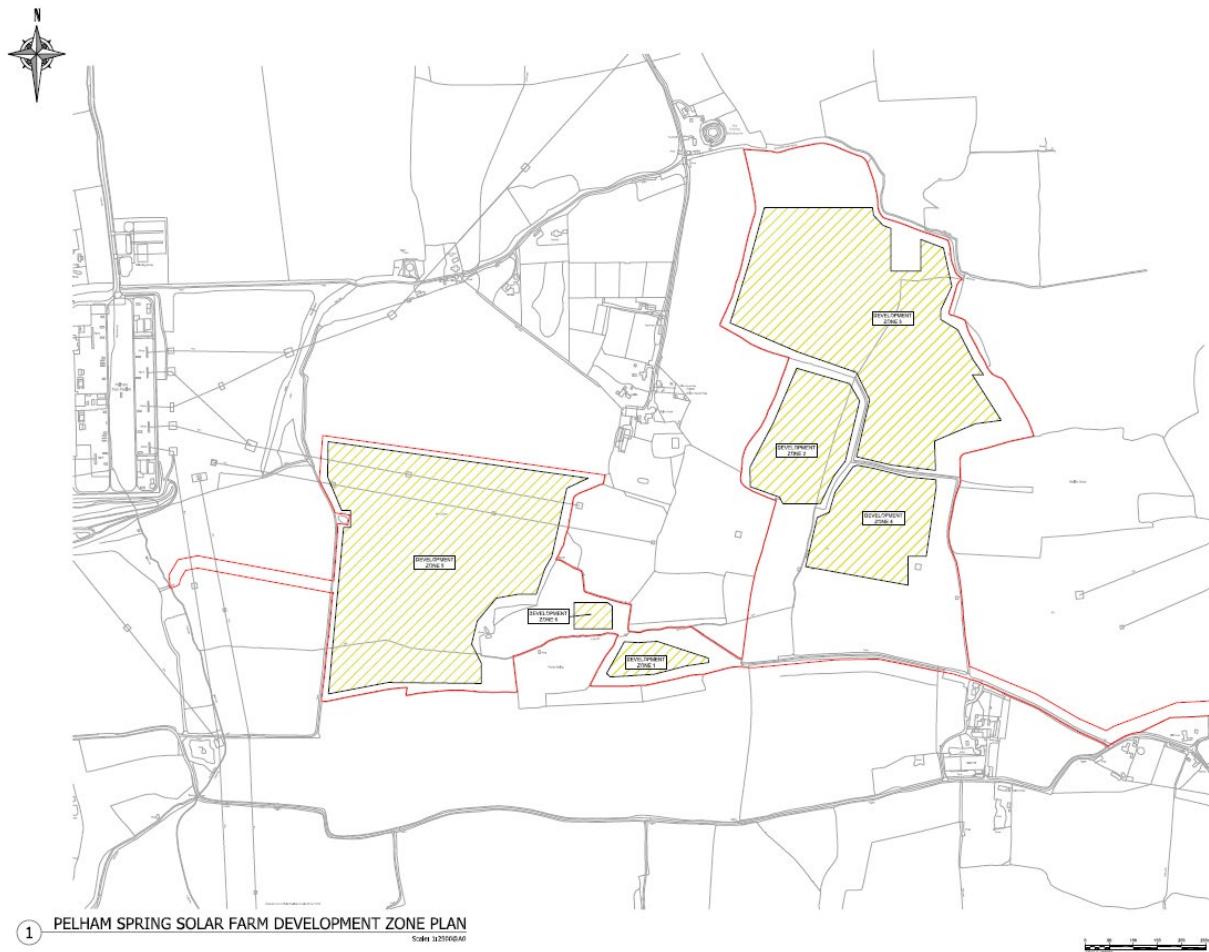
- 3.9 The Applicant has carried out a comprehensive pre-application consultation exercise in respect of the Proposed Development (in accordance with Design Principle 6). The pre-application consultation exercise has included engaging key consultees and local stakeholders (including Parish Councils, Ward Councillors, County Councillors, Local MPs, local interest groups and individual members of the public), the circulation of an information leaflet and feedback form to local businesses and residents within the surrounding area, the creation of an online consultation website and interactive consultation platform known as 'CommonPlace' and the conducting of a drop-in Q&A session and public exhibition.
- 3.10 The formal consultation was comprised of two phases, starting with a first round of formal public consultation on the 5th March 2021, with the local community asked to submit any observations by 26th March. The primary round of consultation was closed early on 23rd March 2021 in recognition that there was further work to undertake and additional options to explore. Following the primary consultation, a phase of informal site meetings was offered to the immediate neighbours to the site before a second round of consultation on a revised site area commenced on 12th July, ending the 9th August. Alongside the second round of formal public consultation an online Webinar/Q&A session was held with local residents on the 19th July before a public exhibition event was held at Manuden Village Community Centre on the 2nd August. The consultation strategy was designed to take account of the COVID-19 restrictions on physical gatherings in place at the time of the events, particularly during the early rounds of consultation.
- 3.11 The CommonPlace platform was utilised to fill the gap left by the inability to carry out a public exhibition during the initial rounds of the consultation, as it allowed consultees to review a significant amount of information about the Proposed Development, make comments on specific aspects and complete a feedback form. In addition, a freepost service was setup to provide postal feedback, whilst a dedicated email address and a freephone telephone line was set up and manned by the Applicant.
- 3.12 The objective of the consultation was to introduce and evolve the design of the Proposed Development, including elements of the design approach and proposed management measures. Examples of the consultation materials produced, including leaflets, are appended to the Consultation Report that forms part of the planning application submission.

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- 3.13 The applicant has given meaningful consideration to the feedback received from the local community throughout the pre-application consultation exercise and has made a number of additions and changes to the design of the proposed development throughout the course of the separate rounds of public consultation. The structure of the pre-application consultation and the comments raised throughout the separate rounds of consultation are discussed in further detail in the supporting Statement of Community Involvement submitted alongside this planning application.
 - 3.14 Following the refusal of the previous planning application, the applicant has also submitted a pre-application advice request to Uttlesford District Council (Ref: UTT/22/0679/PA) on 14th March 2022 to obtain constructive feedback on a redesign of the proposals to achieve a revised application which would be capable of receiving officer support. Following detailed engagement from the Council's planning, conservation, landscape and archaeology officers, it was considered that a revised design which removed PV arrays from the southern, south eastern and northern part of the eastern parcel of the site could be considered appropriate when one applies a tilted planning balance.
 - 3.15 In addition to the above, the applicant has also held separate pre-application discussions with Essex County Council Highways to agree a suitable construction access strategy for the site.
 - 3.16 The development proposals subject to this planning application have subsequently been revised to take on board the pre-application advice received.

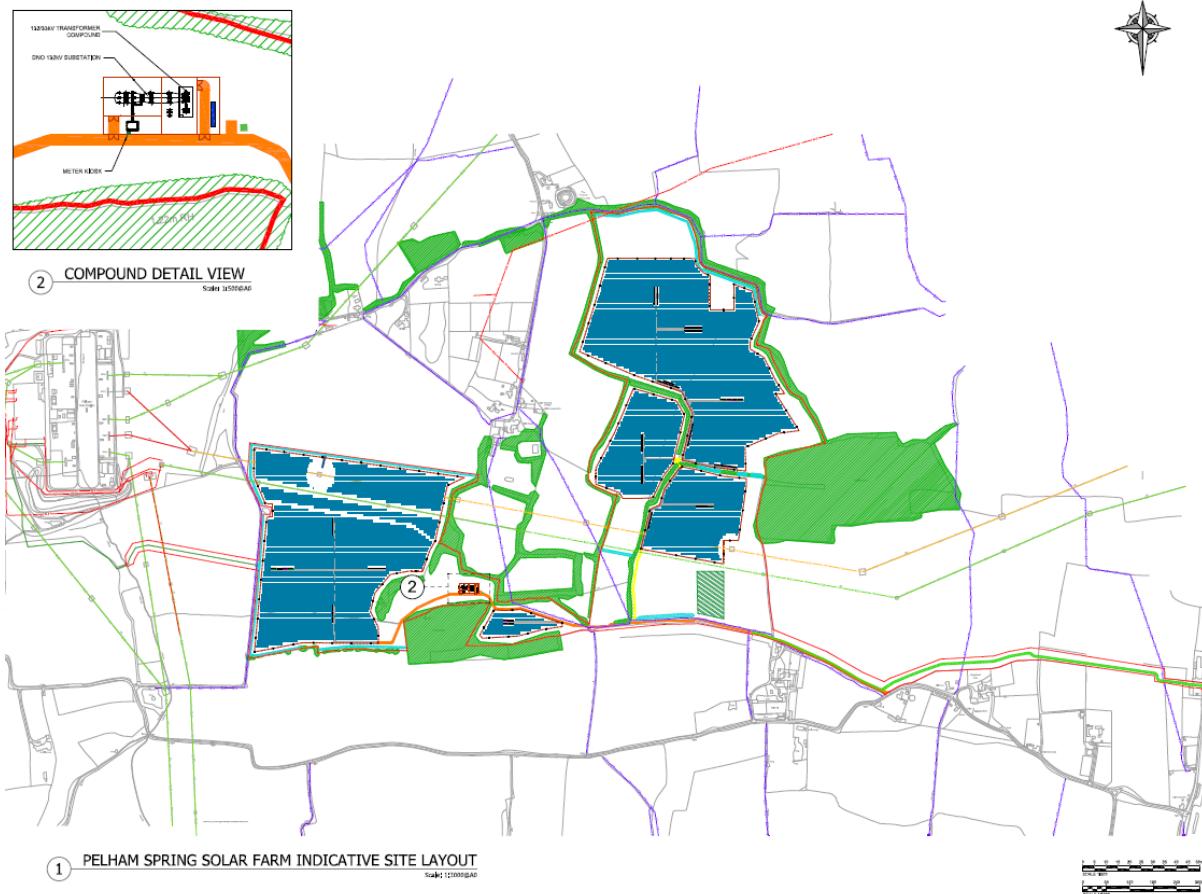
4. DESIGN FLEXIBILITY

- 4.1 Construction work on the Proposed Development, assuming planning permission is granted, would not commence until a final investment decision has been made by the Applicant and a contractor appointed. Following the award of the contract, the appointed contractor would carry out a number of detailed studies to inform the technology selection for the Proposed Development and also to optimise its layout and design before starting work at the Site.
- 4.2 It follows that it has not been possible for the Applicant to fix all of the design details of the Proposed Development at this stage. The Applicant has therefore sought to incorporate sufficient design flexibility. This relates to the dimensions and layout of structures forming part of the Proposed Development, including the precise layout of the Site and the height of the solar panels.
- 4.3 In order to ensure a robust assessment of the likely significant environmental effects of the Proposed Development, the assessments that form part of the planning application have been undertaken adopting the principles of the 'Rochdale Envelope'.
- 4.4 The approach involved assessing the maximum (and where relevant, minimum) parameters for the elements where flexibility is required. For example, the solar panels have been assessed for the purposes of landscape and visual impact as being maximum of 3m high, which is the worst-case. In reality, the panels could be lower.
- 4.5 The approach also involved defining development zones, rather than having a defined layout. This would allow the future contractor to optimise the layout of the solar farm following any grant of planning permission, rather than being bound to a precise layout.
- 4.6 The zones are shown in the Zoning Layout Plan (Reference: DZ-01) that forms part of the planning application submission. The plan is reproduced below.
- 4.7 The zones define where certain infrastructure should be located within the Site, but there is flexibility in terms of the layout within each zone. The infrastructure that is permitted to only be located within each zone is as follows:
 - Development Zone 1 – Solar panels, inverters, and battery containers.
 - Development Zone 2 – Solar panels, inverters, and battery containers.

- Development Zone 3 – Solar panels, inverters and battery containers
- Development Zone 4 – Solar panels, inverters and battery containers
- Development Zone 5 – Solar panels, inverters and battery containers
- Development Zone 6 – DNO 132kV Substation, DNO LV Substation, Transformer Compound, Customer Switchgear and Meter Kiosk



Zoning Layout Plan



Indicative Layout Plan

5. DESIGN SOLUTION

5.1 The remainder of this section explains how the Proposed Development addresses the site context and local characteristics in respect of its use; amount; layout; scale; location; materials; duration; landscaping; and, access.

Use and Amount

5.2 Given the Site's largely agricultural context, the Proposed Development has been designed to be sympathetic to its surroundings (including a comprehensive landscaping and biodiversity scheme), whilst being practical in terms of technical and engineering considerations. It is therefore considered that, on balance, the proposed use is compatible with the surrounding area.

5.3 The Proposed Development includes the construction and operation of the following equipment:

- Arrays of solar PV panels;
- Approximately 23 containerised inverters;
- Approximately 36 containerised battery storage units;
- 33-132kV Substation compound to include: Transformers, DNO substation and Customer substation/switchgear and meter equipment;
- Internal access tracks;
- Perimeter fence and access gates; and
- CCTV cameras.

5.4 This is considered the minimal level of development necessary to ensure that the site performs effectively with regard to its main purpose of generating electricity.

Layout, Scale and Materials

5.5 The design principles for the layout of the solar farm are: -

- The solar panels would be laid out in straight south-facing arrays from east to west across the field enclosures.
- There will be a gap of at least 3-4m between each row of arrays and maximum top height of the solar panels would be 3m. The minimum standard height of the lowest part of the solar modules fixed onto the framework will be 0.9m.

- Typical minimum distance between edge of panels and perimeter fencing would be 4.5 - 5m to allow maintenance access. The same distance is typical between the perimeter fence and existing field boundaries. Therefore the distance between the panels to field boundaries will be in the region of 9-10m and this enables the creation of wildlife corridors.
- PV Array exclusion zones around identified archaeological remains within the north of the site in proximity to the Crump.
- Retention and enhancement of existing PRoWs running through and adjacent to the site, with PV arrays located away and offset from any existing PRoWs which cross or run in proximity to the site.
- Retention of at least a 30-50m buffer adjacent to Ancient Woodland.

5.6 The components of the solar farm include:

- The solar panel modules are made from photovoltaics which are blue, grey or black in colour and constructed of anodized aluminium alloy.
- A galvanised steel frame mounting system will support the solar array.
- Inverters cabins will be situated across the site either towards the centre of each solar section, or, aligned with existing hedgerow boundaries to reduce visual impact.
- Customer Switchgear and DNO Substation will be positioned in the centre of the site where the existing enclosure provided by mature woodland and established vegetation will screen it from view.
- Temporary construction and main site access tracks of permeable construction.
- Internal access tracks of permeable construction.

5.7 The solar photovoltaic modules would convert solar irradiance into direct current (DC) electricity. A solar PV module consists of a layer of silicon cells, an anodised aluminium frame, a glass casing, and various wiring to allow current to flow from the silicon cells. Silicon is a 'non-metal' with conductive properties that allow it to absorb and convert sunlight into electricity. When light interacts with a silicon cell, it causes electrons to be set into motion, which initiates a flow of electric current.



The photovoltaic modules would be mounted on aluminium metal racks. The racks will be laid out in multiple parallel rows running east to west across the various field enclosures. The distance between the arrays would respond to topography but would typically be between 3m to 4 m. Land surrounding the panels would be used for biodiversity enhancements.

- 5.8 The insulated DC cables from the solar modules will be routed in channels fixed on the underside of the framework. The DC string cables will run along the entire underside of each row. The electrical cabling from each array will be concealed through shallow trenches linking the modules to the transformers and then to the main substation. The cable trench may also carry earthing and communications cables and will be backfilled with fine sands and excavated materials to the original ground level.
- 5.9 All of the structures at the site would be single storey height only, ensuring that they would not be significantly visible from most viewpoints outside of the site. The only exception to this is the proposed 132kV DNO substation where some limited vertical elements will feature at approximately 6m in height, however, this has been carefully sited in the centre of the site within an area that benefits from significant visual containment provided by existing mature vegetation and woodland which surround it. Even when viewed from nearby vantage points, the scale of development would not be overbearing due to its low profile. This would be further improved when proposed screen planting matures, which, in addition to the significant existing screening around the Site, would effectively assimilate the site into the local landscape over time.
- 5.10 The arrays would be set within stock-proof/deer fencing up to 2m in height with wooden supporting posts placed at intervals of c. 3.5m.
- 5.11 The deer fencing would typically run parallel with the outer field boundaries containing the solar panels and corridors will be maintained between fenced areas to allow deer to permeate through the site. The minimum distance between the edge of the arrays and the fence would be 4.5m followed by 4.5m outside the deer fencing to the field boundary. In addition to fencing, it is proposed pole mounted CCTV security cameras would be positioned at intervals along the inside face edge of the fencing (between the fence and the arrays) at a height of 2.5m. Badger friendly/small mammal access points will be prescribed at various locations along any fencing to allow the passage of badgers across the site.

5.12 The existing footpaths that cross and run adjacent to the site will be retained, preserved and kept open as part of development proposals with the existing mature tree and hedgerow planting along the sides of the PRoW bolstered with additional planting to ensure appropriate screening of the development. The revised scheme presented as part of this planning application has since sought to remove significant areas of panels from particular areas of the site which are crossed or lie in close proximity to the existing PRoWs, particularly within the south, south eastern and northern parts of the eastern site parcel, which seek to conserve the amenity of users of these PRoWs.

Appearance

- 5.13 The most visible components of the Proposed Development would be the solar panels. These would be mounted on a metal frame and constructed from non-reflective glass.
- 5.14 It is notable that the solar panels are designed to absorb sunlight, therefore there would be no significant issues associated with glint and glare. The metal frame is treated to avoid any significant issues associated with glint and glare. The metal frame is necessary because it is durable and is sufficiently strong to hold the panels in position; a functional design requirement.
- 5.15 It is envisaged that the containers/cabins and other small buildings would be appropriately coloured or clad to minimise any visual impact and comply as far as practicable with the local vernacular. The structures would however be functional in appearance, reflecting their purposes, which is for the generation of electricity. The proposed 132kv DNO substation and transformer compound has been appropriately located within the centre of the site such that it is contained within an area surrounded by existing mature vegetation and woodland meaning any views into the substation are heavily screened.

Landscaping & Biodiversity

- 5.16 The proposed solar farm is an example of a development which presents considerable opportunity for landscape and biodiversity mitigation and enhancement. The objectives for biodiversity are: -
- Retain and protect existing habitats of local value within and adjacent to the site during construction and operation, specifically hedgerows, woodland, trees and watercourses.

- Identify protected or notable species that may be present and potentially affected by the proposed development, and incorporate suitable avoidance, protection and mitigation measures to ensure their continued favourable conservation status;
- Provide habitat and landscape enhancements through new planting and creation of connected habitat linked to the wider area, using native species appropriate to the locality; and
- Provide opportunities for wider species diversity through planting and seeding, including hedgerow creation and infilling and creation of a diverse meadow/butterfly grassland.

- 5.17 Habitat creation and ongoing management practices are proposed that will enhance the Site's biodiversity (See supporting Ecological Assessment for further details). The design and long-term management of the land seeks to maintain and improve functionality through protecting and enhancing potentially valuable existing, and creating new, wildlife corridors both around and through the site by strengthening the hedgerow and footpath network and creating new corridors through separating compound fence lines. Habitat enhancement measures include new native species hedgerow and tree planting and gapping up of existing hedgerows, creation of extensive grassland areas to replace arable land, species diverse meadow grassland, and swale creation. It is proposed to enhance existing hedgerows with supplementary planting of native species where required.
- 5.18 New lines of native hedgerows and trees are also proposed along some of the site boundaries and along Public Rights of Way within and adjacent to the site to aid screening. Again, species will be native and consistent with existing hedgerows within and around the site and will be maintained at 3m height. In addition, the strengthened hedgerow network will benefit habitat linkages in the local landscape and new wildlife corridors will enable the transition of wildlife through the site, including deer.
- 5.19 These, combined with wildflower meadow planting, an associated reduction in intensive agricultural management practices such as chemical spray applications and ploughing, will create ecological gain. Overall, the proposed suite of ecological and landscape enhancements across the site will result in a net gain of 104.84% in Habitat Units and a 56.91% net gain in Hedgerow Units, thus demonstrating a significant biodiversity net gain across the site.

Access

- 5.20 The proposed construction access is via the existing field access point off Manuden Road, to the east which will be upgraded appropriately to accommodate safe entrance and exit by both operative and construction vehicles.
- 5.21 Temporary signage will be erected in the vicinity of the site during the construction phase to indicate that heavy construction vehicles are turning.
- 5.22 The operational access will be from the south east of the site via an existing access track that extends north westwards from an unnamed road to the south of the site, running adjacent to Battles Hall. This is detailed further in the Construction Traffic Management Plan.

6. CRIME IMPACT ASSESSMENT

6.1 The Crime Impact Assessment process involves identifying, evaluating and mitigating the crime and disorder effects of a development proposal early in the design process. The goal is to reduce the developments vulnerability to crime by taking into account the analysis of the development context and the crime issues in the area.

General Risk Assessment

6.2 The typical security issues for a development of this nature are:

- Acts of criminal damage during the construction period
- Theft of components during the construction phase
- Criminal damage during operational phase
- Theft of components during the operational phase, and
- Theft of components during site restoration.

Construction Site Risk Assessment

6.3 A secure temporary compound will be used to store materials and ancillary welfare facilities during the construction period. During construction, the site will have an on-site security presence overnight.

Security Requirements

6.4 Taking into account the low level of recorded crime for the locality, the following security measures are considered to be appropriate to combat potential criminal activity and unauthorised access into the arrays:

- A 2.0 m high fence will encompass the entire gated solar farm development site
- Pole mounted CCTV cameras will be positioned at intervals along the fence.

7. CONSTRUCTION PHASE

Temporary Construction Compound

- 7.1 During the construction phase, one main construction compound will serve the proposed development. The construction phase is expected to take around 20 weeks. Construction activities will be carried out Monday to Friday between 0800-1700 and between 0800 and 1300 on Saturdays.
- 7.2 Around 922 Heavy Goods Vehicles deliveries could be made, at an average of around 8 deliveries, or 16 two-way movements per day.
- 7.3 The temporary compound will likely include: -
- Temporary portable buildings to be used for offices, welfare and toilet facilities
 - Containerised storage areas
 - Parking for construction vehicles and workers vehicles
 - Temporary hardstanding
 - Temporary gated compound
 - Wheel washing facilities.
- 7.4 If ground conditions dictate, wheel washing facilities will be provided within the site before vehicles exit onto the local highway. All construction vehicles will be required to exit through the wheel wash area before exiting to site. This will ensure no mud or loose material is transferred onto the local highway network.

8. DECOMMISSIONING

- 8.1 The solar farm would export renewable energy to the grid for up to 40 years. After the 40 year generation period the development would be decommissioned and the land restored back to agricultural use.
- 8.2 When the proposed solar farm is decommissioned, the solar panels and other infrastructure will be removed. Around 90% of materials can be recycled currently and research is ongoing within the industry to increase this figure. Due to the limited quantity of foundations, hard surfacing and heavy infrastructure, combined with the fact that the majority of the site will be retained as grassland, the land will be easier to restore than more intrusive development with more significant foundations.
- 8.3 The restoration process is intended to ensure that the site is restored to the same quality as existing and it is anticipated that this can be secured through the use of a suitably worded planning condition or section 106 agreement as has been secured on other solar developments in the district.

9. CONCLUSION

- 9.1 The design and access issues of the proposed renewable energy scheme have been proportionately addressed and designed sensitively in keeping with existing topography and the landscape. Through this process, the Proposed Development will not have an unacceptable adverse impact on the visual or amenity value or character of the local or the wider countryside by way of its siting, scale, form, massing or appearance.
- 9.2 The renewable energy scheme is compliant with the relevant provisions of Policies S7 (The Countryside), GEN1 (Access), GEN2 (Design) and ENV15 (Renewable Energy) and would not have an adverse effect on landscape character or residential amenity. The site has been carefully selected and is afforded with natural screening, which coupled with its low profile of the solar panels, results in only limited views of the site.
- 9.3 Overall, the development proposal meets the requirements of the NPPF's presumption in favour of sustainable development and is compliant with all relevant policies of the adopted Development Plan. On that basis it is considered that planning permission should be granted, subject to the imposition of any necessary planning conditions.

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