Planning Committee: 18 July 2023 **Item Number:** 6

Application No: W 22 / 1577

Registration Date: 06/10/22

Town/Parish Council: Beausale, Haseley, Honiley & Wroxall **Expiry Date:** 05/01/23

Case Officer: Adam Walker
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Land West of Honiley Road (A4177), Honiley, Kenilworth
Installation of a solar farm and battery storage facility with associated infrastructure (re-submission of W/21/2080) FOR Enso Green Holdings P Limited

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The application is brought forward to the Planning Committee because more than 5 valid representations have been received where these are contrary to the officers' recommendation.

RECOMMENDATION

It is recommended that the application is refused for the reasons set out in this report.

DETAILS OF THE DEVELOPMENT

The application seeks full planning permission for the installation of a solar farm and battery storage facility along with associated infrastructure. The proposal would operate for a period of up to 40 years, after which the site would be returned to agricultural use. The solar arrays would be capable of generating 23.1 MW of power and it is estimated that this would produce enough renewable energy for the equivalent of approximately 6,000 average family homes a year. The energy generated by the solar arrays would be stored on site and transferred to the National Grid substation at Berkswell (within the administrative area of Solihull Metropolitan Borough Council).

The main components of the proposal comprise:

• Ground mounted solar photovoltaic panels: The panels would be arranged in linear rows on a north–south axis and would rotate through the course of the day to follow the movement of the sun. The height of the panels would be 3m above ground level when fully tilted. Each panel would be fixed to a steel or aluminium post that is pile-driven into the ground.

• Inverter, transformer and switchgear stations: These would be housed within metal containers and distributed across the site (9no. in total). The containers measure 12.2m (L) x 2.4m (W) x 2.9m (H) and would be painted moss green colour. This infrastructure is required to convert the electricity generated from direct current (DC) to alternating current (AC).

• Battery storage facility: Comprises a series of linked batteries housed in shipping type containers. Adjacent to the batteries, also enclosed within containers, are inverters, transformers, cooling systems and other associated electrical plant and equipment. A total of 20 containers are indicated, grouped together within a single area of the site. The containers would be moss green colour and measure 12.2m (L) x 2.4m (W) x 2.9m (H). The battery compound would be formed on an area of crushed aggregate and would be enclosed by a 2.4m high metal weld mesh security fence.

• Substation, control room, auxiliary transformer and storage containers: These buildings and electrical infrastructure would be located adjacent to the battery storage facility within a fenced crushed aggregate compound. The substation building measures 11.7m (L) x 4m (W) x 3.9m (H). The control room measures 6m (L) x 3m (W) x 3m (H) and has a single 5.7 m high weather station and communications satellite dish. The storage containers measure 12.2m (L) x 2.4m (W) x 2.9m (H). The auxiliary transformer has a footprint of 4.1m (L) x 4.1m (W) and is enclosed by 2.2m high deer fencing. These components are necessary to export the electricity generated (or stored) onsite to the electricity network.

• Underground cabling: To connect the solar panels, inverters/transformer stations and battery storage facility to the proposed on-site substation and control room as well as underground cabling to link the proposed substation to the existing Berkswell National Grid Substation.

• Perimeter fencing: Security deer type fencing up to 2.1m in height with gates at necessary locations to enclose the perimeter of the development. The fencing would be set in from the external site boundaries, separated by field margin planting of varying depths.

• Security and monitoring CCTV/infra-red cameras: Mounted on up to 3m high posts along the internal perimeter of the site.

• Weather station poles: Up to 3m in height and located around the site (typically at least one within each parcel of land).

• Site access: Two points of access are proposed from Drum Lane and one from Manor Lane. Existing field accesses off each of these roads would be used, with improvement works to create suitable visibility splays.

• Internal access tracks: Access tracks within the site to connect the associated plant and equipment and enable access between the fields. The tracks would be constructed of crushed aggregate and would be between 3.5m to 6m in width.

• Landscaping: Proposals for soft landscaping include grazing mix underneath the solar panels, areas of meadow planting around the site boundaries, woodland buffer planting, native hedgerow planting and native scrub planting to infill gaps within existing vegetation.

• Other elements: The proposals also include biodiversity enhancements and surface water attenuation measures.

The application is a re-submission of application W/21/2080, which was withdrawn by the applicant before it was determined.

THE SITE AND ITS LOCATION

The application site comprises of approximately 54.6 hectares of predominantly agricultural land to the western side of Honiley Road (A4177). The land forms a series of irregular shaped fields with a mixture of hedgerows and trees to the boundaries. Drum Lane dissects the southern part of the site.

The application site also includes the route for underground cabling within Honiley Road; this extends northwards from the development site up to the boundary between Warwick District and Solihull Metropolitan Borough Council.

The site lies entirely within the Green Belt and the surrounding area is rural in character, with several scattered farms and small settlements. The Dogs Trust Kenilworth and Warwickshire Park Hotel lie a short distance to the north.

PLANNING HISTORY

W/21/2080 – Installation of a solar farm and battery storage facility with associated infrastructure – Withdrawn

SCR/21/004 – Screening Opinion for proposed installation of a solar farm and battery storage facility with associated infrastructure on land east and west of Honiley road (A4177), Honiley, Kenilworth.

RELEVANT POLICIES

- National Planning Policy Framework

Warwick District Local Plan 2011-2029

- DS4 - Spatial Strategy
- CC2 - Planning for Renewable Energy and Low Carbon Generation
- NE4 - Landscape
- HE1 - Protection of Statutory Heritage Assets
- HE4 - Archaeology
- EC2 - Farm Diversification
- BE3 - Amenity
- NE2 - Protecting Designated Biodiversity and Geodiversity Assets
- NE3 - Biodiversity
- TR1 - Access and Choice
- TR2 - Traffic generation
- TR3 - Parking
- FW1 - Development in Areas at Risk of Flooding
- SC0 - Sustainable Communities
- BE1 - Layout and Design
- NE5 - Protection of Natural Resources
- FW2 - Sustainable Urban Drainage
- DS18 - Green Belt

Guidance Documents

- Air Quality & Planning Supplementary Planning Document (January 2019)
- Parking Standards (Supplementary Planning Document- June 2018)

SUMMARY OF REPRESENTATIONS

Beausale, Haseley, Honiley & Wroxhall Parish Council: Objection for the following reasons:

- The proposal will fundamentally alter the tranquillity and openness of the area by placing a large industrial scale development within it
- The application is contrary to Green Belt Policy within the NPPF and contrary to Local Plan Policies DS4, EC2, CC2, NE4 and NE5
- The proposal would have a detrimental impact on the Arden landscape, fundamentally altering its visual appearance and sense of openness. This landscape is enjoyed not just by residents but by many visiting walkers, cyclists, runners, horse-riders and classic car enthusiasts
- Users of the A4177 and the A4141 will have their current view of the open Arden landscape transformed to one of security fencing and highly visible solar arrays, ranging in height from 1.5m to 3m, depending on the time of day.
- The Arden landscape is populated by deciduous trees and hedgerow plants, which means that it will be open for half the year, and hence highly visible to all passers by. The proposed planting scheme, although attractive in itself, will not provide adequate screening for residents and drivers, and the industrial nature of this site will be highly visible and have a continuous negative impact on the beauty and openness of the site
- The proposal will take productive agricultural land out of production, or at best significantly reduce its agricultural output
- The biodiversity benefits of the development should be attributed no weight in favour of the application. Although the increasing bio-diversity proposal is to be welcomed, it can be achieved without the need for an industrial scale solar farm
- Energy generated at this site will be transported to the National Grid sub-station at Berkswell for their use and distribution. As such there will be no local benefit from this supply of energy
- Concern raised with the applicant's site selection process; no weight should be given to the statement that no suitable alternative sites exist
- The proposal cannot be regarded as a "temporary" structure in the Green Belt. An implication of the need for more solar farms to be built to meet net zero means that the proposal will need to continue to exist in some format. This will permanently alter the landscape and the openness of the Green Belt
- The proposal does not demonstrate that "very special circumstances" that would outweigh the potential harm to the Green Belt

WCC Landscape: Objection for the following reasons:

- The reduction in scale of the proposals is noted, and while an improvement on the previous scheme, the development is still large scale and not appropriate in this location
- The site is in the Green Belt and the proposal would harm the openness of the Green Belt
- The site is considered to have special qualities which makes it more than "commonplace countryside"
- The site lies within the Arden Parklands Landscape Character Type; the introduction of solar panels and other associated infrastructure would industrialise the area and fundamentally change its intrinsic character
- The site lies adjacent to an area of Ancient Arden Landscape Character Type; a large scale development such as this is completely at odds with the Ancient Arden Landscape Type and does not form an appropriate backdrop
- The mitigation proposals of tree planting and allowing hedgerows to grow to 3m+ in height will itself be harmful to the landscape character. The proposed boundary screening will make people feel 'hemmed in'
- The combination of solar panels and other infrastructure, as well as tall hedgerows, will not allow middle distance views and will not give people a sense of place
- This area is well-used by pedestrians, cyclists and horse riders and the character would be severely diminished by the proposals
- The 'Stratford on Avon District Renewable Energy Landscape Sensitivity Study (2014)' which applies to Warwick District due to the cross over between district borders and landscape character types states that the potential for solar energy development within the Arden Parklands Landscape Type is "limited to smaller scale developments which can be located away from highly visible areas next to roads and be mitigated by woodland and hedgerows". The proposals do not constitute a small site away from highly visible areas
- The site boundaries are very close to some residential properties currently in a very rural setting; the introduction of these man-made features on such a scale will have a negative impact on this setting and the views from these properties
- The 'temporary' lifespan of 40 years is not regarded as temporary and the duration of the effect of this development at site level within the immediate setting and at the scale of the landscape type will be long term. Although there is no fixed rule on how to define long terms, as a guide the third edition of the Guidelines for LVIA indicates long term as ten to twenty five years
- Detailed commentary provided on the proposed planting
- Overall the solar farm would contravene Policies NE4, CC2 and DS18 of the Local Plan

WCC Archaeology: It is agreed that archaeological issues could be dealt with by means of pre-commencement conditions. However, written assurances regarding the scope of the required works would first need to be provided by the applicant.

WCC Ecology: No objection subject to a revised Landscape and Ecological Management Plan and a condition requiring a Construction Environmental Management Plan. A Biodiversity Net Gain of 131% would be provided by the development.

Kenilworth Town Council (adjoining): No objection

WCC Highways: No objection subject to condition

Health & Community Protection - Environmental Sustainability: No objection subject to conditions

Environment Agency: No comments to make

LLFA: No objection subject to conditions and advisory notes

WDC Conservation: No objection

Historic England: No comments to make; refer to in-house Conservation Officer

Forestry Commission: Neither support nor objection; standing advice provided

Tree Officer: No objection subject to condition

WCC Public Rights of Way: No objections

Public Representation:

120 objections received raising the following points:

- Impact on the openness of the Green Belt / loss of Green Belt land
- Conflicts with the purposes of including land in Green Belt
- Inappropriate development in the Green Belt and very special circumstances have not been demonstrated
- Increasing renewable energy production does not represent very special circumstances
- Proposal is contrary to the objectives of the NPPF
- There needs to be consistency with other proposed developments in the Green Belt that have been refused
- Application will set a precedent for further Green Belt development
- Proposal would add to harm caused by HS2
- The environmental benefits are overstated
- UK climate does not lend itself to solar energy production / production of energy will be inefficient
- There are alternative options to deliver smaller, more appropriately scaled solar developments such as through subsidies through the Contracts for Difference regime. These contracts provide additional, guaranteed revenue

to developers during operation to offset the costs for renewable projects that may otherwise make them commercially unviable

- Concerns raised with the site selection process
- Brownfield sites should be used instead of greenfield, including on roofs of existing buildings
- The 40 year operational lifespan is not temporary
- Delivery of renewable energy should be provided by off-shore wind and tidal power generation. These sources have the capacity to provide more than enough renewable energy for the UK's needs.
- No direct local benefit to the energy that would be produced as it would be distributed via the national network
- Oversized industrial development
- Harmful to the countryside and natural environment
- Detrimental impact on Arden Parklands Landscape Area and adjacent Ancient Arden landscape / development will fundamentally change the character of the area
- Harmful visual impact. The area is well used by residents and leisure visitors who will be affected
- Development would be highly visible to high sensitivity visual receptors due to local topography and height of development
- Insufficient separation between the proposed infrastructure and nearby dwellings
- Drum Lane is well used locally – proposal will have a significant visual, amenity and highway safety impact on this route
- Impact on the Midland Link national trail, which crosses along Drum Lane
- Height and density of proposed screening will itself fundamentally change the nature and openness of the local landscape
- Loss of good quality farmland / Loss of BMV land / impact on food security
- No information on how the site will be returned to agricultural use
- Land offers natural habitat to a number of protected species and other wildlife / negative impact on wildlife
- Proposal will add to the already unacceptable levels of HGV traffic and the safety issues and congestion on our local roads and lanes / impact of additional traffic movements
- Supporting information lacks accuracy, veracity and is factually deficient / material deficiencies in the application and consultation process

- The proposal is an attempt to secure financial gain at the expense of the local environment and amenity of local communities / commercial exploitation of the current energy situation
- Impact on aircraft safety from glint and glare and electrical activity interfering with aircraft navigation and radio systems
- Noise concerns associated with the battery storage facility and inverters
- Noise concerns associated with the motorized articulation of the solar panels
- Safety concerns associated with the battery storage facility (explosions, fire)
- Issues raised with the applicant's pre-application consultation engagement with the local community
- Ecology report has been redacted without explanation
- The installed capacity of the site is not stated
- The project has applied standard assessment criteria in many of its reports, the criteria are only applicable to appropriately sited developments, and therefore do not fully assess the impact of this proposed development
- Privacy concerns from the proposed CCTV cameras
- Same issues exist with the previous application for a solar farm on the site
- There is proof of exposure to low-level electromagnetic fields around solar farms
- Safety concerns with access to the site during development
- Light pollution
- Electromagnetic waves may also be harmful to humans
- Rays off solar plants are shown to kill bird life
- Technology used for production / operation of solar farms has detrimental environmental impacts, including greenhouse gas emissions
- Harm to local businesses as the area would be less attractive to visitors
- Impact on drainage
- Site would need 24 hour security to deter thieves
- Impact on a local footpath

In addition, objection comments have been received by Rt. Hon. Sir Jeremy Wright KC MP:

- Support the objection arguments put forward by Beausale, Haseley, Honiley and Wroxall Parish Council, together with the concerns raised by the WCC Landscape Team. We need to protect our Green Belt and in particular our Ancient Arden Landscape, a distinctive feature of this area of our countryside.
- I continue to be concerned that an application with a 40 year lifespan should be regarded as "temporary". In reality this is unlikely to be the case and so we are looking at the loss of productive agricultural land, and permanent industrialisation of our natural heritage.
- Whilst the priority of producing more of our own energy using renewable resources is to be welcomed, it is equally important that such developments are appropriately positioned and sustainable for the longer term, for example, on rooftops (public, private and commercial properties).

10 support comments received raising the following points:

- The application does not conflict with Green Belt policy in the NPPF or Policy CC2 of the Local Plan
- The development would not have any significant impact on food scarcity and the objections made regarding the loss of arable land are misinformed
- The development would not industrialise the landscape any more than energy crop production
- The proposal will support agricultural diversification. This gives security to local rural jobs and businesses
- The impacts of the development will be temporary
- The proposal will result in a significant biodiversity net gain and green infrastructure
- Sheep will continue to graze on the site and as such there will be a continued agricultural use and no loss/limited loss of agricultural land
- The renewable energy generated will deliver significant environmental benefits and help tackle climate change. The wider benefits of this take precedence
- A solar farm is consistent with Government and WDC policy and the Council's declared climate emergency ambitions
- The development can be deployed quickly and cheaply
- The battery storage will maximise the deployment of renewable energy, storing it at times of oversupply and deploying it at times of high demand

- The visual impact of the solar farm will be limited to the site and its immediate surroundings due to the flat topography of the site and existing strong hedgerows
- The scheme has been scaled back from the original proposal and has been thoughtfully designed to minimise impacts
- The visual impact would be minimal
- Resting the soil for 40 years will improve the soil health

ASSESSMENT

Background

The application site has been subject to a previous planning application for a solar farm and battery storage facility under application reference W/21/2080. That application included the current application site as well as a substantial area of land on the eastern side of Honiley Road. The application was withdrawn in October 2022.

The previous proposal was for a solar farm with a power output of up to 49.9 MW (equivalent to meeting the annual electrical needs of approximately 12,995 average family homes) on a site of some 113.2 hectares. In addition to the land forming the current application site, the previous application included a parcel of land immediately to the east and another separate parcel towards the north east that contains a public right of way. The solar panels were proposed to be of a 'fixed' design, so would not move with the path of the sun, with a maximum height of 3m.

The previous application therefore involved a much greater geographical spread of development. By comparison, the current scheme represents over a 50% reduction in site area and concentrates the development on one side of Honiley Road only. The proposed arrays are the 'solar tracker' type and would have a power output of 23.1 MW. The maximum height of the proposed solar panels is the same as the previous scheme.

An identical application to W/21/2080 was submitted to Solihull Metropolitan Borough Council (SMBC) because it represented a cross boundary planning application, with the cabling route to the Berkswell National Grid Substation falling within the jurisdiction of SMBC. The underground cabling was approved by SMBC in February 2021.

The Council has previously issued an Environmental Impact Assessment Screening Opinion (Ref: SCR/21/0004) for a 49.9 MW solar farm development involving the land within the previous planning application. It was considered that an Environmental Statement would not be required under the Town &

Country Planning (Environmental Impact Assessment) Regulations 2017. Given that the current proposal is for a significantly reduced scale of development, it holds that an Environmental Statement is not required for the current application.

Principle of development

Provision of renewable energy generation

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. At its core is the need for the planning system to contribute to the achievement of sustainable development. Paragraph 8 of the NPPF explains that achieving sustainable development means the planning system has three overarching and interdependent objectives; these are economic, social and environmental.

Of particular relevance to this application is the environmental objective which seeks to protect and enhance the natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

Paragraph 152 of the NPPF sets out that the planning system should support the transition to a low carbon future in a changing climate. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources and support renewable and low carbon energy and associated infrastructure.

When determining planning applications for renewable and low carbon development, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions. Such applications should be approved if its impacts are (or can be made) acceptable (NPPF, paragraph 158).

Policy CC2 of the Local Plan relates to renewable energy and low carbon generation, stating that proposals for such technologies (including associated infrastructure) will be supported in principle subject to all of the following criteria being demonstrated:

a) the proposal has been designed, in terms of its location and scale, to minimise any adverse impacts on adjacent land uses and local residential amenity;

b) the proposal has been designed to minimise the impact (including any cumulative impacts) on the natural environment in terms of landscape, and ecology and visual impact;

c) the design will ensure that heritage assets including local areas of historical and architectural distinctiveness are conserved in a manner appropriate for their significance;

d) where appropriate, the scheme can link in with proposals being brought forward through the Council's Low Carbon Action Plan and any other future climate change strategies;

e) the scheme maximises appropriate opportunities to address the energy needs of neighbouring uses (for example linking to existing or emerging district heating systems);

(f) - (i) specifically relate to proposals for biomass, hydropower and wind energy and so are not applicable to this application.

The explanatory text to policy CC2 recognises the importance of increasing the amount of energy sourced from low carbon and renewable technologies in reducing carbon emissions, helping to ensure fuel security and stimulating investment. It goes on to reference national planning policy and the important role that planning has in supporting the delivery of new renewable and low carbon energy infrastructure and the need for local authorities to take a positive approach to such schemes.

The explanatory text does however acknowledge that this does not mean that the need for green energy overrides environmental protections and the planning concerns of local communities. The delivery of such proposals therefore needs to be carefully managed in the context of the natural and historic environment and in relation to the impact on local amenity. In balancing these objectives, it is important to acknowledge that the impact of specific technologies will vary by location.

Paragraph 5.115 of the explanatory text provides some commentary on solar power. It states that large-scale solar farms should be focused on previously developed and non-agricultural land. Where greenfield sites are proposed for such development, it should be demonstrated that the use of any agricultural land is necessary and where applicable that the proposal allows for continued agricultural use. Where possible, best and most versatile agricultural land should be protected. Given that solar farms are temporary structures, the Council may apply planning conditions to ensure that the land is restored to its previous greenfield use in the event that the operation ceases.
Specific consideration will be given to the effect of glint and glare on neighbouring uses and aircraft safety including additional impacts if the array follows the movement of the sun. Applicants should demonstrate that opportunities to mitigate landscape and visual impacts through, for example, screening with native hedges have been maximised.

In addition to the above planning policy, in 2019 Warwick District Council declared a climate emergency. This requires the Council to take immediate action to drastically reduce carbon emissions and includes a commitment for Warwick District to be as close as possible to ‘net zero’ (carbon neutral) by 2030.

Within the supporting information, the applicant also draws attention to a range of national policy objectives regarding climate change and renewable energy.

These include, amongst others, the Government's Energy White Paper (2020), National Policy Statement EN-1 (2021) and the Government's Net Zero Strategy: Build Back Greener (2021).

There is clear support for the overarching principle of the proposed development at both national and local level. The proposal would contribute towards the country's supply of renewable energy, which would provide environmental benefits and enhance energy security. Supporting information indicates that the development would generate renewable energy for the equivalent of approximately 6,000 average family homes a year and displace approximately 5,300 tonnes of CO2 per annum, which represents an emission saving equivalent to a reduction of around 1,750 cars on the road every year. This weighs in favour of the application.

Support for the principle of the proposal is however subject to consideration of the site specific impacts of the development.

Green Belt Assessment

Paragraph 137 of the NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Paragraph 138 goes on to specify the five purposes of the Green Belt, which are:

a) to check the unrestricted sprawl of large built-up areas;
b) to prevent neighbouring towns merging into one another;
c) to assist in safeguarding the countryside from encroachment;
d) to preserve the setting and special character of historic towns; and
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraphs 147-151 of the NPPF set out the requirements for assessing proposals that affect the Green Belt. Paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations (NPPF, paragraph 148).

The NPPF identifies certain types of development that are not inappropriate in the Green Belt. Solar farms are not included within these exceptions and as such the proposal constitutes inappropriate development. The applicant agrees that this is the case. Very special circumstances therefore need to be demonstrated to justify the proposal.

Paragraph 151 of the NPPF specifically relates to renewable energy projects within the Green Belt and states that "elements of many renewable energy

projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources."

With regards to local planning policy, Policy DS18 echoes the requirements of the NPPF.

Effect on the openness of, and purposes of including land within, the Green Belt

Openness is not defined in the NPPF but is commonly understood to refer to an absence of development. Openness is to be considered in both visual and spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public domain. The duration of a development and its ability to be returned to its original or equivalent state of openness is also relevant when considering the potential impact of development on the openness of the Green Belt, as is the degree of activity likely to be generated.

The application site comprises of a series of fields that are bound by Honiley Road (A4177) to the east. Manor Lane abuts the northern extent of the site and Drum Lane dissects the southern portion of the site. There are no buildings on the site and the boundaries of the fields are generally formed by hedgerows with some having mature trees. The landform of the site is gently sloping throughout, with the highest point of the site being to the north east corner close to Honiley Road (approximately 129m AOD) and at its lowest point further to the south along Honiley Road (approximately 120m AOD).

The surrounding landscape is generally similar in landform with some local gently undulating valleys located to the east. Land generally falls to the east of the site towards Kenilworth, with other surrounding areas being of a similar level to the site itself. Some locally man-made levels are evident associated with Honiley Road (A4177) particularly in proximity to Haseley Knob.

The site is located within a landscape made up of agricultural land interspersed with large areas of woodland and crossed by a number of A-roads and minor roads. In addition to several scattered farmsteads there is some notable built development within the vicinity of the site. This includes the settlements of Haseley Knob to the east, Wroxall to the west and Five Ways to the south. The Warwickshire Park Hotel and the Dogs Trust Kenilworth lie a short distance to the north with the Holly Farm Business Park, which appears to be repurposed agricultural holding, lying slightly further beyond that. Nevertheless, this existing built development generally comprises contained forms of largely ribbon development that is not uncommon in the Green Belt. The application site contributes towards the separation between these built forms and adds to the overall sense of openness within this location.

The proposal would introduce a significant amount of development into the area. The proposed solar arrays occupy the majority of the site and would be grouped into areas, separated by existing field boundaries, new landscaping and the proposed access tracks. The arrays would be positioned on a north-south axis

and would follow the existing topography of the land, with the maximum height of each solar panel being 3m above ground level.

The proposed battery storage compound would be located adjacent to Drum Lane and would contain up to 20 large containers enclosed by metal fencing. Adjacent to this would be a substation, control room, auxiliary transformer and 2 storage containers. A further 9 containers housing the inverter, transformer and switchgear stations would be spread across the site. Other ancillary development includes security fencing, pole mounted security cameras and weather station poles. There would be some limited changes to the landform of the site to accommodate foundations of the battery storage and substation and other structures, including fencing and CCTV.

Measures to mitigate the visual impact of the development are proposed as part of the scheme. This includes the retention of the existing trees and field boundary hedgerows, with gaps in the existing hedgerows infilled where required. Additionally, new hedge and tree planting is also proposed, including tree planting to both sides of Drum Lane and native woodland planting to enclose the site along its southern boundary. The existing and proposed native hedgerows would be managed to a height of at least 3m. All elements of the development would be set in from the external boundaries of the site and separated by a landscaped buffer.

The introduction of the proposed solar farm development would have an impact on the openness of the Green Belt from both a visual and spatial perspective.

The submitted Landscape and Visual Impact Assessment (LVIA) provides an analysis of the visual effects of the development. This is discussed in more detail as part of the landscape assessment later in this report, but the LVIA acknowledges that due to the scale of the proposed development it would introduce a notable feature into the landscape, even with the retention and augmentation of boundary hedgerows and trees. Having said that, the gently undulating nature of the surrounding landscape with the network of surrounding woodlands and tree lined hedgerows combined with the retention of existing vegetation and the proposed mitigation planting would mean that the visual effect on the openness of the Green Belt would be relatively localised.

In spatial terms, the existing site is open and free from development and the proposal would introduce a substantial amount of development onto the site. The quantity of arrays within the scheme would result in an extensive ground cover and the battery storage facility, substation, numerous containers, security measures and the other ancillary aspects of the development would result in additional built form that would further diminish the openness of the Green Belt. The prevailing height of development across the site would generally be up to 3m, although the solar arrays would follow the existing topography and so would undulate in height across the site and the substation would be almost 4m high. Whilst the individual solar arrays would have a relatively modest mass and footprint, cumulatively they would result in a substantial amount of development. It is therefore considered that the overall volume of development would have a

significant spatial impact on the openness of the Green Belt when set against the existing situation.

The proposal would operate for a period of up to 40 years after which the solar farm would be decommissioned and the land returned to agricultural use. Planning Practice Guidance and appeal decisions confirm that a 40 year lifespan for a solar development is to be considered temporary. The impact on the openness of the Green Belt would not therefore be permanent and the existing openness of the Green Belt would ultimately be reinstated. This reduces the impact of the development when considering the effect on openness.

In terms of the level of activity generated by the development, once the solar farm is operational there would be very limited traffic movements connected with its use and as such it is not considered that associated activity would have any impact on openness.

To conclude on the issue of openness, it is considered that the proposed development would result in substantial harm to the openness of the Green Belt. This is principally a result of the spatial impact owing to the amount and spread of development across such a large area. There would also be some visual harm to the openness of the Green Belt, although it is acknowledged that this would be mitigated to an extent by landform and screening. The visual impact does nevertheless add to the overall harm. Furthermore, officers do not consider that the temporary nature of the development does not adequately mitigate the harm that would be caused over such a prolonged (40 year) period of time in this instance.

There are five key purposes of including land within the Green Belt, as detailed earlier within this assessment. The application site lies within the West Midlands Green Belt, which covers some 923 square miles and surrounds Birmingham and Solihull, the Black Country and Coventry (outside of Warwick District).

The Joint Green Belt Study (2015) undertook an assessment of Green Belt land within six West Midlands councils, including the Green Belt within Warwick District. The Study assessed the Green Belt against the five purposes of Green Belts, as set out in the NPPF.

The Study explicitly identifies parcels of land adjacent to the large built-up areas and main rural villages with the remainder of the Green Belt being submerged into “broad areas”. These broad areas are defined as largely open and undeveloped countryside between the large built-up areas and main rural villages; they are the main body of the Green Belt and make a strategic contribution to the purposes of the Green Belt.

The application site is identified as lying within 'Broad Area 4'. The Study states that the area makes a considerable contribution to all purposes of the Green Belt as follows:

- Checking the sprawl of Warwick to the south east and Kenilworth and Coventry to the north east.

- Preventing the merging of these neighbouring towns in the long term, particularly Warwick, Kenilworth and Coventry to the east. However, the south western half of the broad area makes a less significant contribution to preventing neighbouring towns merging due to there being no towns immediately to the west and south west.
- Safeguarding the countryside, including a number of large woodlands, such as Hay Wood.
- Preserving the setting and special character of the historic towns of Warwick, Kenilworth and Coventry. The broad area has excellent views in to the historic core of Kenilworth, and Warwick; however, there are limited views in to the historic core of Coventry to the north.
- Assisting urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands.

The Joint Green Belt Study is clear that the broad areas make a strategic contribution to the Green Belt purposes. The application site forms part of one of these broad areas and, as an area of strategic importance, this is a significant consideration. It is considered that there has not been any material change in circumstances in terms of the application site's surrounding context since the Study was carried out to alter this.

Officers recognise that the application site is remote from the nearest towns and large villages. Indeed, it is also well separated from those parcels of land adjoining the main towns and large villages that are identified in the Joint Green Belt Study. It is therefore considered that the application site does not have a meaningful role in checking the unrestricted sprawl of large built up areas and preventing neighbouring towns from merging into one another. This also has some bearing on one of the other purposes of the Green Belt, which is to preserve the setting and special character of historic towns. A detailed heritage assessment is made later in this report but for the purposes of the assessment here officers are satisfied that historic towns would be unaffected.

The proposal is however considered to result in encroachment. The site forms part of an agricultural landscape. It forms a series of fields adjacent to other similar fields where the nature of built development within the wider vicinity would generally be considered as in keeping with a countryside setting. The proposed scheme would place extensive solar arrays across the site along with a range of supporting infrastructure of a relatively substantial nature. This would fundamentally alter the appearance of the site, have an urbanising influence, and fail to preserve its open qualities. As such, the proposal would contradict one of the fundamental purposes of the Green Belt which is to safeguard the countryside from encroachment.

The proposal also has the potential to conflict with the final purpose of the Green Belt which is to assist in urban regeneration by encouraging the reuse of urban land. Officers are of the opinion that it is unlikely that a suitable brownfield site exists that could accommodate a solar farm of this scale and that would also be viable, suitable in all other regards and available for such use. This conclusion is supported by the applicant's Alternative Site Assessment (dated November 2021) which was prepared in support of the previous application for a solar farm

(W/21/2080). Whilst the Alternative Site Assessment relates to a much larger solar development (more than double the current land take), given that the current proposal remains of a substantial scale it is unlikely to materially alter the assessment of potential brownfield sites. Accordingly, it is considered that the proposal would not be in conflict with this purpose of the Green Belt.

Conclusion

The proposal, as inappropriate development, would by definition harm the Green Belt. Officers consider that it would result in encroachment and harm to the openness of the Green Belt in both spatial and visual terms. Accordingly, the proposed development would conflict with the NPPF and Policy DS18 of the Local Plan. All harm to the Green Belt carries substantial weight.

The applicant has sought to demonstrate that very special circumstances exist that clearly outweigh the harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal. The applicant's case is considered at the end of this report following the assessment of all other relevant planning considerations.

Landscape and Visual Impact

Warwick District Local Plan policy BE1 states that new development will be permitted where it positively contributes to the character and quality of its environment through good layout and design. It should harmonise with or enhance land use and should relate well to local topography and landscape features. This policy also recognises the need for development to be resilient to climate change.

Policy NE4 of the Local Plan states that new development will be permitted that positively contributes to landscape character. Proposals must demonstrate that they consider landscape context, including local distinctiveness and enhance key landscape features, ensuring their long term maintenance. Proposals must also identify their likely visual impacts on the local landscape and should conserve, enhance or restore important landscape features. Detrimental impacts on features which make a significant contribution to character, history and setting of an area or asset should be avoided.

Policy CC2 of the Local relates to Planning for Renewable Energy and Low Carbon Generation. It states that proposals for new low carbon and renewable energy technologies (including associated infrastructure) will be supported in principle subject to, *inter alia*, the proposal having been designed to minimise the impact (including any cumulative impacts) on the natural environment in terms of landscape and visual impact. The supporting text to Policy CC2 advises that careful consideration will be given to the visual and landscape impacts of proposals, particularly in the case of large-scale technologies. It recognises that depending on their scale and design solar technologies, particularly large scale solar farms, can have a negative impact on the rural landscape.

Paragraph 174 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by, *inter alia*, protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.

Planning Practice Guidance contains specific guidance on large scale ground-mounted solar. It states that: "The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in very undulating landscapes. However, the visual impact of a well planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively." It goes onto to detail matters which a local planning authority will need to give particular attention to, including the proposal's visual impact and the effect on landscape. The PPG states that local topography is an important factor in assessing whether large scale solar farms could have a damaging effect on landscape and recognises that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas.

When assessing the application in these terms, there is a distinction to be made between impact on landscape, which should be treated as a resource, and impact on visual amenity, which is the effect on people observing the development in places where it can be viewed, such as from roads, public rights of way and individual dwellings.

A Landscape and Visual Impact Assessment (LVIA) has been submitted with the application. The assessment concludes that any notable effects on landscape character or visual receptors as a result of the proposed development would be confined to surrounding local areas with visual effects reduced by the retention of the existing vegetation, the proposed mitigation and the context of surrounding developments. It goes on to state that, despite the extent of the proposed development, the total extent of the landscape and visual effects would be localised and limited in nature.

Landscape character

The site is not covered by any national, regional or local landscape designations.

The site is located within National Character Area 97, Arden. At the regional level, the proposed site lies within the Arden Parklands Landscape Character Type. The site and its surroundings display many of the typical characteristics of this landscape type. The land use is agricultural, and the area is very rural in character, with a historic settlement pattern of scattered farmsteads and loose clusters of dwellings alongside roads.

The application site lies adjacent to an area of Ancient Arden Landscape Character Type, which forms the core of ancient countryside in Warwickshire and is a small-scale, intricate landscape with high tranquillity.

As part of assessing the impact on the landscape, it is firstly useful to consider whether the site lies within a "valued landscape" in the context of paragraph 174 of the NPPF. The concept of a valued landscape is not however defined in the

NPPF. The leading court case on what constitutes a valued landscape is *Stroud District Council v SSCLG and Gladman Developments Ltd.* [2015]. This deals with whether the countryside in question has demonstrable physical attributes (rather than just popularity) which would take the site beyond mere countryside. In other words, whether the attributes elevate the landscape beyond the 'ordinary'.

WCC Landscape are of the opinion that the site does have special qualities which makes it more than 'commonplace countryside'. The landscape officer draws on the fact that the site it is part of the Arden landscape which has "an intimate, historic character with a strong sense of unity" (Warwickshire Landscapes Guidelines) and considers that it is very distinct from other areas of countryside in Warwickshire. The site's proximity to an area of Ancient Arden is also cited as evidence of its special qualities, with this adjacent landscape being described as a small-scale, intricate and tranquil landscape which has been largely undisturbed.

It is also clear from representations made on the application that the landscape is highly valued by the local community, although this of itself is not sufficient to elevate it beyond other countryside locations.

The site forms six gently undulating agricultural fields that are split towards the south by Drum Lane. The fields have typical hedgerow boundaries interspersed with trees. The site is bound by Honiley Road and there is some built development in the vicinity that influences the site. Surrounding agricultural land has similar characteristics to the application site.

Officers consider that the site is representative of the Landscape Character Type in which it sits and does not possess any particular characteristics that could reasonably and justifiably be said to raise it beyond common countryside. It is acknowledged that the site forms part of the wider setting of an area of Ancient Arden Landscape Character Type which includes a nearby area of ancient woodland that is separated from the site by Honiley Road and some farmland. The site's relationship with the Ancient Arden adds to the site's value, however, it is not considered that this conveys such special qualities that it would elevate the site to a valued landscape in terms of paragraph 174 of the NPPF. This conclusion is relevant in assessing the level of harm to the landscape.

It is nevertheless the case that the proposed development would have a considerable impact on the landscape, resulting in a significant change. Indeed, the LVIA acknowledges that, due to the scale of the proposed development within the Arden Parklands landscape type, the proposals would introduce a notable feature into a predominantly agricultural landscape which would change the physical and perceptual attributes of the landscape. It further acknowledges that although existing elements of the site would be retained and protected and mitigation planting provided, the proposals would likely still form a notable change to the physical and perceptual attributes of the landscape type. It assesses this as a Moderate to Minor adverse level of effect in the longer term.

WCC Landscape consider that the landscape character would be severely diminished by the proposed development, with the proposal industrialising the

area and fundamentally changing its intrinsic character. They consider that the proposal would not harmonise with this rural setting and the introduction of large-scale infrastructure, spanning a number of fields, would appear out of keeping with the landscape. It is considered that the large-scale solar farm immediately abutting the Ancient Arden landscape would be an incongruous feature and would not form an appropriate setting.

WCC Landscape have also raised concerns with the proposed mitigation proposals. The mitigation proposals of tree planting and 3m+ high hedgerows are considered to be harmful to the landscape character. One of the characteristics of the Arden Parklands landscape is "middle distance views enclosed by woodland edge" and the combination of the solar panels and other infrastructure, as well as tall hedgerows, would not allow middle distance views and would not give people a sense of place. WCC Landscape consider that uniformly tall hedgerows would not help to assimilate the development into the landscape, as they would not tie in with hedgerow heights across the wider Arden Parklands area which tend to be low cut. The Warwickshire Landscapes Guidelines' management strategy for Arden Parklands suggests "allowing hedges to grow thicker and taller (up to 2m in height)".

WCC Landscape also make reference to the 'Stratford-on-Avon District Renewable Energy Landscape Sensitivity Study (2014)', which is also applicable to Warwick District as the same landscape character types cross between district borders. This says that the potential for solar energy development within the Arden Parklands Landscape Type "is limited to smaller scale developments which can be located away from highly visible areas next to roads and be mitigated by woodland and hedgerows." WCC Landscape comment that the proposed site does not constitute a small site away from highly visible areas.

Officers agree that there would be a significant impact on the appearance of the landscape, although it is not considered that a solar farm would be inherently industrial in appearance, albeit it would have an urbanising influence as new built form sprawling across the site.

The landscape effects would be mitigated, to a degree, by the local topography. The site itself is relatively flat and the surrounding landscape is gently undulating in nature. The built form would generally be limited to 3m in height which would help to mitigate the impact on the landscape character and the extent of the effects would also reduce over time as the proposed mitigation planting matures. Having said that, there are likely to be variances in the effectiveness of the boundary screening over the course of a year because some of the existing planting appears to be deciduous. As such, the development would be much more noticeable during the winter. The applicant also suggests that the temporary nature of the development further mitigates the effect on the landscape and officers accept that the impacts would be reversible, albeit the effect would be perceived for a long time.

With regards to the height of the hedgerow to the external boundaries, whilst a relatively uniform 3m+ boundary hedge would be at odds with the prevailing height of the established fields boundaries on the site and surrounding area,

which are generally lower in height with more natural variances, it is not considered that this would be significantly harmful to the character of the area. Furthermore, the hedging would be providing substantial benefits in terms of screening. It is to be noted as well that sections of the existing vegetation are already at a substantial height, for example part of the boundary to Honiley Road.

Taking all the above into account, officers conclude that the development would have a harmful impact on landscape character, although the extent of this would be localised and is quantified as a moderate adverse impact. The proposal is therefore contrary to Policies BE1 and NE4 of the Local Plan. This harm is to be weighed in the overall planning balance.

Visual impact

The LVIA identifies visual receptors that could be affected by the proposed development within a Zone of Theoretical Visibility (ZTV). These include residential receptors in the area surrounding the site, users of the hotel to the north, public rights of way and road users. The LVIA also classifies their level of visual sensitivity. Residential receptors, users of the hotel and users of PROWs are classed of high visual sensitivity. Users of the local minor road network may be used by pedestrians and cyclists and are therefore also classed as high sensitivity. People using larger A-roads, where the view is not the focus of activity, are of low sensitivity, however, the A4141 has a narrow footway along its route and although mostly used by motor vehicles, it has been classed as high sensitivity. The LVIA includes a photographic record of viewpoint locations within ZTV. Officers accept the methodology that has been used.

The LVIA concludes that the proposed boundary screening would minimise harmful visual effects on the identified receptors. Furthermore, due to the topography of the surrounding landscape with the network of surrounding woodlands and tree lined hedgerows, the visibility of the proposed development is limited in nature. The impact on residential receptors ranges from 'no effect' up to 'moderate adverse'. The 'moderate adverse' impact reduces to 'moderate to minor adverse' at year 5 once the planting has become more established. There is 'no effect' identified on users of the local public right of way network and, where impacts on road users have been identified, these are assessed as ranging from 'moderate to minor adverse' up to 'major adverse' up to year 5. This then reduces to a worst case scenario of 'moderate to minor adverse' thereafter. The greatest impact is identified on users of Drum Lane, where much of the electrical infrastructure is adjacent to the roadside.

There are no public rights of way crossing the site however there are public rights of way within the vicinity of the site. WCC Landscape have commented that the roads around the site are all well-used for recreation (walkers, runners, cyclists and horse riders). They have also stated that the site boundaries are also very close to a number of residential properties which are currently in a very rural setting and the introduction of man-made features on such a scale would have a negative impact upon this setting and the views from these properties. WCC Landscape state that there are a number of properties in the local area that

would have direct views of the proposed development, resulting in a significant change. WCC Landscape also consider that the effect of allowing the hedgerows to grow taller so as to soften / screen the development would make people feel 'hemmed in and prevent views over the wider countryside that people enjoy and that are characteristic of Arden Parklands.

There would inevitably be some impact on visual receptors as a result of the development. As with the assessment of the effects on landscape character, there are nevertheless some mitigating factors that would help to limit the extent of these impacts. Views of the development from the residential properties on the eastern side of Honiley Road along Greenacres and Three Ways would be screened and/or heavily filtered by existing vegetation that exists between these properties and Honiley Road, with the proposed boundary screening significantly adding to this. Views from Meadow View, which lies to the south of the site, would also be well screened by new planting and the orientation of this property is such that its main outlook is not towards the site. A similar situation exists with the hotel to the north of the site. Views from Manor Farm, Wroxall village and Glendale, which lie towards the west, would be heavilly filtered by intervening vegetation (existing and proposed) which would limit visibility. Views from residential properties within the wider vicinity would also be restricted by the presence of existing field boundary hedges and woodland, and the relatively low level form of development and new planting would further limit the potential for the development to be seen. As such, officers consider that the impact on residential receptors would be relatively limited and localised in nature. There would be perceptible change to the character of the roads adjacent to the site as a result of the 3m+ hedgerow and this is likely to give road users a feeling of being 'hemmed in', particularly along Drum Lane where the site straddles both sides of the road. However, when experienced from Honiley Road and Manor Lane it would only be perceived on the development side of the road and the existing level of openness would be maintained on the other. Overall, it is considered that the visual impact of the proposal would result in moderate harm. In identifying harm, the proposal would conflict with Policies BE1 and NE4 of the Local Plan. This harm is also to be weighed in the planning balance.

Appeals

During the application process, the applicant provided some recent appeal decisions for ground mounted solar developments which discuss the impact on the landscape and visual impacts. Officers have considered these appeal decisions in the context of the proposal. It is difficult to draw too many parallels with different schemes in other parts of the country because each site will have its own unique set of characteristics and surrounding context which will influence the effects on the landscape and visual receptors. Nevertheless, the sample of appeal decisions provided by the applicant are useful in so much as they give an indication of the weight that Inspectors have been attributing to the harm caused by solar developments within a rural landscape. The landscape and visual impact assessment that officers have undertaken above is not deemed to be inconsistent with the general thrust of the appeal decisions.

Cumulative visual and landscape effects

The LVIA does not identify any other existing or planned solar farms or other large scale renewable energy projects within the area and officers do not consider that there are any such projects that would need to be taken into account when assessing this application. The site is relatively close to Balsall Common in Solihull and officers are aware that there is a potential future scheme for a large solar farm at Holly Lane but that has not reached planning stage yet and, in any event, it is some distance from the application site.

Heritage Assets

Section 72 of the Planning (Listed Buildings and Conservation Areas) 1990 imposes a duty when exercising planning functions to pay special attention to the desirability of preserving or enhancing the character of a Conservation Area. Section 66 of the same Act imposes a duty to have special regard to the desirability of preserving a listed building or its setting when considering whether to grant a planning permission which affects a listed building or its setting. This means that considerable importance and weight must be given to any harm caused to designated assets in the planning balance.

Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage assets, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Policy HE1 of the Local Plan states that development will not be permitted if it would lead to substantial harm to the significance of a designated heritage asset. Where the development would lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal.

The site contains no designated or non-designated built heritage assets. The site's wider context includes:

- The Grade II Registered Park and Garden of Wroxall Abbey c.260m to the west of the site. This Registered Park and Garden also contains a Grade II Listed Entrance Lodge and a Scheduled Monument.
- Wroxall Conservation Area which lies to the north of Wroxall Abbey and contains a Grade II listed school house (Wren Hall).
- The Grade II Listed Building of Manor Farmhouse c.300m to the west of the site.
- The Grade II listed Cheney's Farmhouse c.180m east of the site.

- Several listed buildings at Honiley to the north which include the Grade II Listed Church Farmhouse c.400m east of the north-eastern corner of the Site, the Grade I Listed Church of St John the Baptist, Grade II* Listed gate piers to the church, the Grade II Listed Malthouse and North and South Lodge.

The application is accompanied by a Heritage Statement which officers consider provides an appropriate and proportionate level assessment of the potential impact of the proposed development on designated heritage assets within and beyond a 1km radius of the site.

The Heritage Statement gives particular attention to the Grade II Registered Park and Garden of Wroxall Abbey and the Grade II Listed Building of Manor Farmhouse, which have an historic association of land ownership and occupancy with the application site. It concludes that the central/northern-central parts of the application site make a small contribution though setting to the significance of Manor Farmhouse; the proposed development would change the historic agricultural landscape character and the solar arrays would be visible from the east-facing rear and south-facing side elevations of the asset. This is anticipated to result in a small degree of harm to the significance of Manor Farmhouse. The Heritage Statement also concludes that the site makes no meaningful contribution to the significance of Wroxall Abbey or any other designated heritage asset, and as such no potential harm to any other designated heritage asset is identified.

The Council's Conservation Section has assessed the application and no objections have been raised. Historic England were also consulted on the application, with no issues by this consultee.

Officers consider that the harm that would be caused to the significance of Manor Farmhouse by virtue of the change to its setting would be limited and towards the lower end of 'less than substantial harm' in the context of paragraph 202 of the NPPF. It is also considered that there would be no harm to any other designated heritage asset.

In accordance with paragraph 202 of the NPPF and Policy HE1 of the Local Plan it is necessary to weigh the identified harm against the public benefits of the proposal. This requires a balanced planning judgement and this is provided at the end of this appraisal.

Archaeology

Policy HE4 of the Warwick District Local Plan states that development will not be permitted that results in substantial harm to archaeological remains of national importance, and their settings unless in wholly exceptional circumstances. The Council will require that any remains of archaeological value are properly evaluated prior to the determination of the planning application.

A report detailing the results of a geophysical survey has been provided with the application and the submitted Heritage Statement submitted considers the

potential impact of the development on archaeological heritage assets. The Heritage Statement concludes that there is some potential for the site to contain within it archaeological remains most likely relating to medieval and post-medieval agricultural activity and that remains relating to buildings shown on the 1840's tithe mapping are also likely to be present. The Heritage Statement also considers that the site has a low potential to contain within it archaeological remains dating from prehistoric, Roman and early medieval periods. Little evidence for pre-medieval activity has been identified within the site.

WCC Archaeology consider that the lack of evidence for pre-medieval activity may be a reflection of a lack of previous investigations across this area rather than providing any evidence of a lack of archaeological remains. The potential for this site to contain archaeological remains from the prehistoric periods onward should therefore be considered to be unknown and it therefore follows that the age, depth, extent, and significance of any archaeological deposits should they be present will also be unknown.

WCC Archaeology initially advised that the archaeological implications of the proposal could not be adequately assessed based on the available information and recommended that further archaeological evaluation was undertaken prior to determining the application. It was envisaged that this would comprise a programme of trial trenching. Nevertheless, following discussions between the applicant, WCC Archaeology and WDC a consensus view was reached whereby it was agreed that archaeological matters could be adequately addressed through appropriately worded pre-commencement planning conditions. This would allow for trial trenching to take place and, subject to the findings of the archaeological investigation, provide a scheme of mitigation. This is considered to be a proportionate approach in this case.

Effect on Agricultural Land

Paragraph 174(b) of the NPPF places value on recognising the intrinsic character and beauty of the countryside including the best and most versatile agricultural land. The glossary within the NPPF defines Best and Most versatile (BMV) agricultural land as being land in grades 1, 2 and 3a of the Agricultural Land Classification.

Policy EC2 of the Local Plan relates to farm diversification and seeks to protect BMV agricultural land. Additionally, Policy NE5 (Protection of Natural Resources) states that development proposals will be expected to demonstrate that they avoid the best and most versatile agricultural land unless the benefits of the proposal outweigh the need to protect the land for agricultural purposes.

The application is supported by an Agricultural Land Classification (ALC) Report. This has determined that the quality of agricultural land across the site is a mix of Grade 2 (0.8 Ha, 1.5% of total Site area) and Grade 3b (53.8 Ha, 98.5% of total Site area). As such, the overwhelming majority of the site is classified as being moderate quality agricultural land that falls outside the classification as BMV land.

Nevertheless, it is recognised that the site provides arable value and the development would mean that it would no longer be capable of providing such a function. The applicant has sought to justify the loss of arable land on the basis that the development is temporary and fully reversible and that the management of the land under the solar PV panels over the operational life of the scheme has the potential to improve soil health, such as increasing soil organic matter and organic carbon which would provide benefits for the soil. Furthermore, the applicant confirms that the site is proposed for use for low intensity sheep grazing during the operational period, which represents a continued agricultural use of the site.

The justification put forward by the applicant provides some mitigation although officers consider that it is unlikely to fully offset the loss of the arable land for such a substantial period of time. Nevertheless, as the significant majority of the site does not meet the BMV classification, it is not considered that there would be grounds to refuse the application and the loss of a small amount of Grade 2 land is attributed very minor harm in the planning balance.

Impact on Amenity

Warwick District Local Plan Policy BE3 requires all development to have an acceptable impact on the amenity of nearby users or residents and to provide acceptable standards of amenity for future users or occupiers of the development. Development should not cause undue disturbance or intrusion for nearby users in the form of loss of privacy, loss of daylight, or create visual intrusion.

Paragraph 185 of the NPPF states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health on health and living conditions.

The applicant has submitted a landscape and visual impact assessment (LVIA) which includes an assessment of the visibility of the proposed solar farm at local residential properties. Officers have already made an assessment of the likely visual impact and the level of harm, taking into consideration relevant mitigating factors.

The application is accompanied by a glint and glare assessment report which considers the potential for adverse impacts to arise from reflected sunlight at nearby residential and road receptors. The potential impacts on aircraft has also been considered. With regards to residential receptors, the report has identified that existing landscaping will provide screening for the majority of identified residential receptors. Once existing screening has been accounted for, one residential dwelling located approximately 300 metres away has been identified where reflected solar glare is geometrically possible.

The report suggests that the distance between the proposed development and the identified residential receptor would significantly reduce the visibility of the reflective area and that impacts would be limited to early mornings when the sun

is just above the horizon. The report also indicates that solar reflection can only occur when the sky is clear and that the reflective areas would not be visible from ground floor level at the identified receptor.

The report concludes that the risk of glint and glare is low and that no specific mitigation measures are necessary in this instance. WDC Environmental Protection have assessed the application and raise no concerns in relation to glint and glare. It is to be noted that WDC Highways have not raised any issues with glint and glare in respect of highway safety.

The proposed development would require the installation of various inverters, transformers, and battery energy storage plant which may give rise to noise. The applicant has provided a noise impact assessment which considers whether these items of plant would have an adverse impact on nearby amenity. The assessment includes a measurement of existing background sound levels at two representative locations as well as the calculation of possible noise impacts using manufacturer sound data. The assessment concludes that plant noise would have a low risk of adverse noise impact at nearby noise sensitive premises during both day and night time operation.

To ensure that proposed plant and equipment does not cause adverse noise impacts at nearby sensitive receptors, WDC Environmental Protection have recommended a condition to control noise output from the plant/equipment.

To mitigate the impacts on amenity from the construction phase, a condition would be necessary to require the construction works to be completed in accordance with Warwick District Council's construction guidelines. This would help ensure that adverse impacts on nearby residential amenity such as noise, dust, lighting, and waste, are minimised.

Subject to the aforementioned conditions, the development is considered to be in accordance with Local Plan Policy BE3 and relevant guidance in the NPPF.

Biodiversity

The NPPF and Local Plan place great importance on the protection and enhancement of biodiversity, including achieving a biodiversity and green infrastructure net gain when mitigating impacts of new development.

Policy NE2 of the Local Plan states that development will not be permitted that will destroy or adversely affect protected, rare, endangered or priority species unless it can be demonstrated that the benefits of the development clearly outweigh the nature conservation value or scientific interest of the site and its contribution to wider biodiversity objectives and connectivity. Policy NE2 goes on to state that all proposals likely to impact on these assets will be subject to an ecological assessment.

Policy NE3 of the Local Plan states that new development will be permitted provided that it protects, enhances and / or restores habitat biodiversity. Development proposals will be expected to ensure that they lead to no net loss

of biodiversity, and where possible a net gain, where appropriate, by means of an approved ecological assessment of existing site features and development impacts; protect or enhance biodiversity assets and secure their long term management and maintenance, and; avoid negative impacts on existing biodiversity.

The likely effects of the proposed development on nature conservation and biodiversity have been assessed in the Ecological Assessment Report (EAR) and Biodiversity Net Gain Assessment accompanying the application. A Landscape and Ecological Management Plan (LEMP) has also been submitted which sets out management objectives and principals to ensure the long-term ecological value of the site. Proposed measures within the LEMP include planting of pasture/wildflower mix (suitable for sheep grazing) underneath panels to attract invertebrates, in particular bees; additional areas of wildflower planting around site boundaries, native hedgerow planting, woodland buffer planting, provision of bat / bird / owl boxes and hibernacula, insect hotels and log piles.

Habitats

With the exception of the underground cabling route to the SMBC boundary, the site comprises of agricultural land at present. The farmland consists of arable fields, with poor semi-improved grassland field margins, semi-improved grassland areas and mature and semi-mature scattered trees and hedgerow field boundaries. A number of mature trees are present within the hedgerows and fields, including a number ancient/veteran trees. There are five ponds located within the site (although one was dry when the site was surveyed). As such, there are a range of habitats of high and moderate ecological value present on site. Invasive non-native species Japanese knotweed is present in the south of the site. The design of the proposed scheme has largely avoided direct impacts to any trees and hedgerows on site, but the works would result in loss of approximately 10m of existing hedgerow for access routes.

The applicant has confirmed that a small section of the existing planting on the north-eastern edge of the site (approx. 1-2m) would be cleared to allow the installation of the underground cable. Once the installation has taken place, the land would be returned to its previous condition and compensation planting provided, with the land managed in accordance with the LEMP.

There are no statutory designated sites on site or within close proximity to the site. Manor Farm Ancient Woodland and Clattyland Wood Ancient Woodland lie to east and west of the site respectively. The 'Road Verge potential Local Wildlife Site' and 'Pool at Manor Farm potential Local Wildlife Site' are located adjacent to the application site.

Protected and notable species

The EAR considers the impact on protected species, including great crested newts, reptiles birds, bats, otters, water voles, badgers and other protected and notable species.

The initial consultation response from WCC Ecology raised several queries regarding the assessment of impacts on protected species, particularly with regards to great crested newts and skylarks. The applicant provided a formal response and advised that the on-site ponds could be enhanced to increase their aquatic value, with details of these improvements to be provided in a final version LEMP to be secured by condition. With regards to skylarks, the applicant has suggested a bespoke condition requiring a 'Skylark Mitigation Strategy'. Updated comments have subsequently been provided by WCC Ecology (dated 02/06/23) and no specific concerns have been raised with the impact on any species although it is recommended that updated and detailed protected and notable species surveys be provided as part of a revised LEMP.

Biodiversity Net Gain (BNG)

The submitted BNG Assessment demonstrates that the proposed development would be able to deliver a 135.9% net gain in habitat units and 9.9% gain in hedgerow units. The proposed habitat enhancements include native woodland buffer planting, native tree and hedgerow planting, including infilling of existing hedge gaps, and grassland creation and management. WCC Ecology consider the applicant's calculation to be acceptable, although it has been noted that the solar farm footprint for the land take has been estimated at the lower 3% rather than the 5%. A minor adjustment has therefore been made to the metric calculation by WCC Ecology as a precautionary approach to reflect a 5% land take, with the difference being taken away from modified grassland. Given the significant gain generated, this results in an inconsequential alteration of a 131% net gain. An updated LEMP would be required to secure the proposed landscaping and management plan in the long-term and this could be addressed by condition.

Management

An updated LEMP would be required to address comments made by WCC Ecology. This would need to include updated and detailed protected and notable species surveys and reflect the adjusted BNG calculation as mentioned above, as well as provide a minimum 25 year plan for the site's long term management and include monitoring of the proposed species enhancements. Given that the site would be operational for 40 years, it is considered reasonable for the management plan to cover this period. It is considered that a revised LEMP could be secured by condition.

In addition to a revised LEMP, a Construction Environmental Management Plan (CEMP) would be required to ensure appropriate ecological protection during the construction period. This could also be addressed via a planning condition.

Trees

The application is accompanied by a detailed tree survey and impact assessment report which concludes that the scheme could be implemented without significant impact upon the site's arboricultural resources, subject to the implementation of the advice contained within the report. The application has been assessed by the Council's arboricultural officer and no objections have been raised. A condition

has been recommend requiring an Arboricultural Method Statement detailing how the retained trees are to be protected from harm during the construction of the development.

Highway Safety

Policy TR1 of the Warwick District Local Plan states that development will only be permitted that provides safe, suitable and attractive access routes for pedestrians, cyclists, public transport users, emergency vehicles, delivery vehicles, refuse vehicles and other users of motor vehicles. Development proposals will be expected to demonstrate that they are not detrimental to highway safety; are designed to provide suitable access and circulation for a range of transport modes including pedestrians, cyclists, emergency services and public transport services; and create safe and secure layouts for motorised vehicles, cyclists, pedestrians and public transport and integrate the access routes into the overall development.

Policy TR2 of the Local Plan states that all large-scale developments (both residential and non-residential) that result in the generation of significant traffic movements should be supported by a Transport Assessment, and where necessary a Travel Plan, to demonstrate the practical and effective measures to be taken to avoid the adverse impacts of traffic.

Policy TR3 seeks to ensure that sufficient parking is provided.

A Construction Traffic Management Plan (CTMP) accompanies the application. The CTMP sets out the access arrangements for the site during the construction and operational phases. There would be three points of access for the development, all utilising existing field accesses. There is one access from Manor Lane and two from Drum Lane. The accesses would be the same for both the construction and operational phases. Details of access improvement works along with swept path analysis have been provided to demonstrate their suitability.

The CTMP explains the proposed vehicle movements and suggests a construction vehicle route from the strategic highway network to the site. It indicates that there would be an average of approximately 5 HGVs accessing the site per day over the construction phase along with construction workers arriving and departing in the mornings and evenings.

Once operational, maintenance vehicles (transit van or similar) would visit the site approximately twice a month.

WCC Highways are satisfied with the content of the CTMP in respect of proposed vehicle movements and access arrangements. A condition has been recommended requiring the proposed points of access to be provided in accordance with the standard specification of the Highway Authority and the submitted details. On this basis, officers are satisfied that the development would not have an unacceptable impact on highway safety and the application accords with Policy TR1 of the Local Plan and guidance in the NPPF.

The applicant has proposed the inclusion of two permissive paths within the site; one along the southern side of Manor Lane and one parallel to the northern side of Drum Lane. It is intended that these would provide a benefit to pedestrians using these roads because there is not currently any footway within the highway. Officers consider that the provision of such paths would provide a benefit to highway safety. It would be necessary to secure public access over these routes via a legal agreement.

Low Emissions Strategy

As the traffic flows associated with the site would be minimal post the construction phase of the development and owing to the sustainable nature of the development itself, air quality mitigation measures would not be necessary in this instance.

Flood Risk and drainage

A Flood Risk Assessment and Drainage Strategy has been submitted with the planning application. This confirms that the site is located within Flood Zone 1 (low risk) on the Environment Agency 'Flood Map for Planning' and considers that the site would remain in Flood Zone 1 for its operational lifetime given the local topography and the site's distance from existing Flood Zone extents.

The Flood Risk Assessment and Drainage Strategy also identifies that the majority of the site has a very low risk of flooding from surface water, but there are some parts of the site that have a low, medium and high risk of such flooding. The site is also potentially at risk of flooding from groundwater and sewers, however, flood risk from these sources is low.

A sequential approach has been taken in the site layout whereby the most vulnerable parts of the development would be located in the areas at lowest risk of flooding. In particular, the battery storage facility, substation and the inverter stations would be located outside of the surface water flood extents. The solar panels have also been located so as to minimise any potential flood risk impacts.

With regards to the proposed drainage strategy, it is not considered necessary to provide SuDS for the proposed solar panel arrays because the planting across the site would provide adequate mitigation. Nevertheless, as a precautionary approach, swales have been included along the downslope boundaries throughout the site.

The Environment Agency has been consulted on the application and has advised that the proposal falls outside of their statutory remit and as such they have no comments to make.

The Lead Local Flood Authority raise no objection to the application subject to conditions requiring the development to be carried out in accordance with the submitted Flood Risk Assessment and Drainage Strategy and for drainage verification report to be submitted for approval prior to the development being

brought into use. Subject to these conditions, the application is considered to accord with the NPPF and Local Plan Policies FW1 and SC0.

Other matters

There have been 120 objections received to the application. A large proportion of these have been submitted on a template letter and so raise the same issues, many of which have already been addressed within this assessment. In addition, an objection has been received from the Rt. Hon. Sir Jeremy Wright KC MP who supports the objection arguments put forward by Beausale, Haseley, Honiley and Wroxall Parish Council and the concerns raised by the WCC Landscape Team. Ten representations have been received in support.

Objectors have raised concerns about noise from the development, including the battery storage facility, inverters and the motorised articulation of the solar panels. Noise issues have been considered by the Environmental Protection team and no objections have been raised subject to a condition to control noise. Such a condition would measure noise at the facade of the nearest residential receptors and could be worded so as to ensure that noise from all elements of the solar development was adequately controlled.

Objectors have also raised concerns regarding the safety of the operation of the site, particularly in relation to the risk of fire and explosions. Such concerns could be addressed via a condition requiring a detailed Battery Safety Management Plan - which is not uncommon on planning applications for solar farms that have battery storage.

The impact on aircraft safety from glint and glare and electrical activity interfering with aircraft navigation and radio systems has also been raised as a concern by objectors. The applicant submitted a Glint and Glare Assessment with the application which considers potential impacts on aviation. No significant impacts upon aviation activity are predicted and officers have no reason to disagree with this conclusion.

Furthermore, there is no substantive evidence to suggest that the development would have any undue impact on aircraft navigation and radio systems. Similarly, it is not considered that there is any substantive evidence to support concerns that have been raised in relation to exposure to low-level electromagnetic fields around solar farms and potential impacts on health, such that it would represent a material planning consideration.

Privacy concerns have been raised with the use of CCTV. The CCTV would include motion sensors and would be directed into the development. The site is physically separated from the nearest houses. As such, it is not considered that it would have any implications on privacy.

Light pollution has also been mentioned as a concern however no external lighting is proposed as part of the development.

Of the other issues raised by objectors, these are not considered to materially alter officers' assessment.

Very Special Circumstances (VSC)

The applicant's case for VSC is summarised as follows:

- Increasing Renewable Energy Generation: It is estimated that the proposal would provide the equivalent annual electrical needs of approximately 6,000 average family homes in England. The anticipated CO2 displacement is around 5,300 tonnes per annum, which represents an emission saving equivalent of a reduction in approximately 1,750 cars on the road every year.

- Substantial policy support at an international, national and local level to support the increase in renewable energy to urgently tackle climate change and decarbonise the grid.

- Increased energy security: Reduce reliance on imported fuels and better insulate the country from volatility in the energy market.

- Use of best available technology to maximise the use and productivity of the land for the generation of renewable energy: This comes from both the solar panels and battery storage facility.

- Good design of the site to minimise harm and provide significant benefits to the development as a whole.

- Absence of alternative sites that are suitable and available for the proposed development.

- The impacts are temporary (40 years) and reversible.

- Biodiversity net gain: Biodiversity benefits would result from low intensity grazing below the solar panels, new planting and provision of habitat and nesting features.

- Soil regeneration: Benefits are likely to arise from the conversion of land from arable to grassland.

- Green Infrastructure: This includes new hedgerow and tree planting.

- Provision of permissive paths within the site: These are intended to benefit pedestrians/dog walkers, providing a social benefit in terms of safety, health and wellbeing.

- Farm Diversification: The additional income generated by the proposed development would help to secure the existing farming business.

- Economic benefits: It is estimated that there would be approximately 60 to 70 construction jobs in addition to jobs being created in the supply chain.

The proposal represents significant capital expenditure and would result in a business rates contribution to the Council. The applicant estimates the business rates attracted by the proposed solar farm (excluding battery storage) would be in the region of £75,000 per annum, which could therefore help to deliver both economic and social benefits through the Council's public interest and services spending.

- Connection to the National Grid Network: The proposed connection to the transmission network rather than the distribution network yields benefits in terms of the speed of delivery of the development.

The applicant contends that the benefits stated above amount to very special circumstances that would outweigh the harm to the Green Belt by reason of inappropriateness and any other harm.

During the application process, the applicant has also provided some recent appeal decisions which relate to solar farms in the Green Belt where Inspectors held that the benefits of those schemes outweighed the harm that would arise, including harm to the Green Belt by reason of inappropriateness. The applicant contends that this demonstrates the 'direction of travel' in terms of consideration of solar farms in the Green Belt and provides the Council with some comfort to accept the application's VSC case.

One of these appeals relates to a large solar development in the metropolitan Green Belt in Essex (APP/W1525/W/22/3300222). The appeal site is around 30 hectares bigger than the Honiley Road application site and would provide power for around 16,581 households. The Inspector concluded that the proposal would result in encroachment and moderate harm to the openness of the Green Belt. The Inspector found that the benefits of renewable energy raised substantial benefits in favour of the proposal and ultimately concluded that the public benefits of this were of sufficient magnitude to outweigh the substantial harm to the Green Belt and all other harm that was identified.

It is important to note in the Essex case that the council had quite recently approved two other solar farms near to the appeal site, one within the Green Belt and one adjacent to the Green Belt. The Inspector took those decisions into account as material planning considerations when determining the appeal. The Inspector also commented that these other solar farms would contribute to the visual evolution of the appearance of the area and noted that the appeal site sat within a depression of land and the surrounding landscape already included a range of man-made interventions. This serves to highlight the difficulty in drawing central conclusions from other planning applications, especially when it comes to planning decisions outside of Warwick District. There are fundamental differences with the Honiley Road application, where the proposal would form an isolated solar development within the Green Belt.

Another of the appeal decisions concerns a solar farm together with associated infrastructure within Basildon Borough Council (APP/V1505/W/22/3301454). In that case the Inspector afforded considerable weight to the energy benefit of the

proposal and the appeal was allowed. However, again, there are some fundamental differences between the appeal scheme and the Honiley Road development. The appeal site only related to a small part of a much larger solar farm. Around 35 hectares of the surrounding land had approval from Brentwood Borough Council for a solar farm within the Green Belt and the appeal site represented a small proportion of the overall solar development (circa 3 hectares). The Inspector acknowledged the significant impact of the approved scheme on the openness of the Green Belt and the encroachment into the countryside, and concluded that, due to the limited size and scale of the appeal proposal when compared to the approved solar farm, it would result in limited additional harm to the openness of the Green Belt. This appeal decision is therefore of limited relevance to the application.

Turning to the applicant's VSC in detail, the applicant's principal justification concerns the contribution that the development would make to the production of renewable energy and associated environmental benefits that fully align with international, national and local targets and aspirations to transition to a low carbon economy and tackle climate change. This in turn would also provide knock-on benefits for national energy security.

The NPPF identifies that Very Special Circumstances may include wider environmental benefits associated with the production of energy from renewable sources.

Officers recognise that there is a significant policy requirement and need to tackle climate change and decarbonise the grid network. The provision of low carbon energy is central to the economic, social and environmental dimensions of sustainable development set out in the NPPF. There is strong national policy support for the development from the Government's Energy White Paper (2020), National Policy Statement EN-1 (2021), Net Zero Strategy: Build Back Greener (2021) and British Energy Security Strategy (2022), to increase capacity of the national grid network and to reduce costs for consumers. The application is also consistent with the overarching principles of delivering sustainable development within the Local Plan as well as the Council's Climate Change Declaration, albeit the latter is not a planning policy and is just a statement of intent.

The proposals are of a scale to make a significant contribution to renewable energy production, providing enough clean energy to power approximately 6,000 average family homes per year. The contribution that the development would make to tackling climate change and decarbonising the grid would therefore be significant and attracts substantial weight.

The applicant's VSC also identifies other planning benefits that attract weight in favour of the proposal. The economic benefits associated with the development are considered to attract substantial weight. The considerable biodiversity net gain, which has been assessed at 131% and is far above the minimum 10% biodiversity net gain objective within upcoming legislation, would be of great benefit to the wildlife within the area and this also attracts significant weight (this also covers Green Infrastructure). There is also the potential for benefits to

be realised to the health of the soil, although limited supporting information has been provided to support this assertion and as such it is considered to attract limited weight.

With regards to farm diversification, there is support in the NPPF and Local Plan Policy EC2 for farm diversification projects that meet sustainable development objectives and help sustain agricultural enterprise, subject to it not adversely affecting the countryside and residential amenity. The applicant's Panning Statement puts forward a case for the diversification of the existing farming business and states that the additional income generated by the proposed development would help to secure the business. Officers recognise that the proposal would secure an income stream for the farm business and would thereby help it to diversify, whilst also enabling some farming activity to continue on the land in the form of low level sheep grazing. It is considered that limited weight can be afforded to the diversification of the farming business.

The temporary and reversible impacts of the development have been taken into account as part of the officer assessment and so this has already been weighed within the consideration of the proposal. As such, it is not considered to be a VSC in its own right that should be attributed weight here.

The use of best available technology to maximise the use and productivity of the land for the generation of renewable energy and good design of the site are reasonable expectations for any new infrastructure development such as this and as such officers attribute no weight to these factors.

The applicant cites the absence of alternative sites that are suitable and available for the proposed development as a VSC. The Design and Access Statement details the site selection process that has been undertaken. The first requirement is for the identification of suitable grid connection point. In this case Berkswell substation was one of those identified and the applicant has an agreement with National Grid to allow for a future connection here. A connection to potential sites are then identified within a suitable radius of the point of connection having regard to a range of factors including environmental and planning policy constraints, geographical and topographical considerations, land ownership and commercial viability. Officers accept that these represent pertinent and comprehensive criteria for site selection.

The submission also includes An Alternative Site Assessment (dated November 2021) which was prepared in support of the previous application for a solar farm (W/21/2080). It is to be noted however that the current proposal is for a reduced scale of development, with the proposed land take being less than half of the previous scheme.

The connection to the Berkswell substation has been the driver behind the site selection process and this has therefore determined the search area. Much of the land within a 5km radius of the point of connection (POC) is within the West Midlands Green Belt, with the remainder generally falling within the urban areas of Coventry and Balsall Common.

The Alternative Site Assessment advises confirms that the Brownfield Register for both WDC (2020 update) and SMBC (2020 update) were consulted and no previously developed (brownfield) sites were available to accommodate the proposal within the search area. However, the age of the Alternative Site Assessment and the fact that it relates to a significantly larger development site area than the current application limits its relevance. Nevertheless, officers have already accepted that it is unlikely that suitable brownfield site would exist for the development as now proposed given that it remains of a very substantial size and the potential brownfield sites are unlikely to be viable, suitable in all other regards and available for such use. Furthermore, given the make-up of the land within the 5km radius of the POC, it is somewhat inevitable that potential sites are going to be on agricultural land within the Green Belt.

The site selection process that has been undertaken has resulted in the application site being proposed for development, with the site area having been refined in response to issues raised under application W/21/2080.

A solar farm requires grid capacity and a viable connection to operate. As such, this requirement places a locational restriction on site selection that limits the number of appropriate sites for such a facility. Agreement with the National Grid has already been secured for the POC, with planning permission also approved for much of the underground cabling.

The applicant has set out a reasonable rationale for the approach to site selection based on the proposed POC. The agreement in place with the National Grid to connect into the network here and the approval from SMBC for much of the underground cabling would also help to facilitate the delivery of the development and realise the benefits of the scheme for renewable energy production. This lends some support for the selected site. However, one area that has not been fully explained by the applicant is which other substations were considered as a POC and whether there may be an alternative that could serve the solar farm and potentially avoid land within the Green Belt. This therefore introduces an element of uncertainty and weakens the applicant's case for this being the only suitable site, particularly when a much smaller development than that originally proposed is now being considered for development. This negates the weight that can be attributed to site selection. Indeed, this is considered to weigh against the application in the context of the Green Belt assessment.

Connection to the National Grid Transmission Network, rather than the distribution network, is also put forward as a VSC because it yields benefits in terms of the speed of delivery of the development. This is principally associated with the applicant's ability to begin identifying potential solar sites once a connection is identified. This avoids delays in securing both the connection with the Distribution Network Operator (DNO), land and ultimately the delivery of renewable energy. It is considered that this matter is bound up with the site selection process and as such no positive weight can be afforded to this.

Planning Balance and Conclusion

The proposed development would result in harm to the Green Belt from inappropriateness, loss of openness and encroachment; substantial weight is to be afforded to this harm. Officers have concluded that the proposal would also cause moderate harm to the landscape character and result in moderate visual harm to the area. There would also be less than substantial harm to the setting of a designated heritage asset. The proposal would also convey limited harm to the loss of a small proportion of BMV arable land, attracting limited adverse weight.

Conversely, the benefits of renewable energy raise substantial benefits in favour of the proposal. The development would provide power for around 6,000 average homes, resulting in a saving of approximately 5,300 tonnes of CO2 per annum. The benefits associated with renewable energy generation are recognised at the national and local level and the planning system has an important role in facilitating the delivery of renewable technologies to help tackle climate change.

There would also be benefits to biodiversity and economic benefits, which both attract substantial weight in favour of the proposal. The proposed permissive paths within the site provide a modest benefit. Other potential benefits include improved soil health and the diversification of a farming business, which attract limited weight in favour of the scheme.

Of the other matters identified, including highway safety and amenity impacts, these either result in no material harm or raise technical matters that could be adequately addressed through the imposition of appropriate conditions. As such they neither weigh for or against the proposal.

The policy support for renewable energy and associated development given in the NPPF is caveated by the need for the impacts to be acceptable, or capable of being made so. The Local Plan also recognises that the need for green energy does not automatically override environmental protections and the planning concerns of local communities.

The main issue is whether the benefits of the development, particularly those arising from the provision of renewable energy, are of sufficient magnitude to clearly outweigh the harm to the Green Belt and the other harm that has been identified. If so, this would constitute very special circumstances to justify the proposed development.

Officers conclude that the provision of renewable energy does not clearly outweigh the harm to the Green Belt by reason of inappropriateness, the harm to the spatial and visual qualities of the Green Belt in this location and the harm to one of the five purposes of including land within Green Belt (encroachment). Officers also have some concerns with the site selection process and whether there are sites available outside of the Green Belt which could accommodate the proposal, however, this would not materially alter the overall conclusion on this issue.

The harm to the landscape character and visual impact on the area add to the Green Belt harm and this further tilts the planning balance against the proposal.

The 'less than substantial' harm that has been identified to Manor Farmhouse (Grade II listed building) would, as a standalone issue, be outweighed by the public benefits associated with the environmental and economic aspects of the proposal in the opinion of officers. As such, there would not be grounds to refuse the application on a heritage basis.

This is a finely balanced assessment, however in this case, it is considered that very special circumstances do not exist. The application is therefore recommended for refusal.

REFUSAL REASONS

1. The NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Local Plan policy DS18 echoes the requirements of the NPPF.

   It is considered that the proposal represents inappropriate development, which is harmful by definition. There would be substantial harm to the openness of the Green Belt in both visual and spatial terms and the development would represent encroachment which would conflict with one of the purposes of the Green Belt. It is not considered that there are very special circumstances which exist that clearly outweigh the harm to the Green Belt.

2. Warwick District Local Plan Policy BE1 states that new development will be permitted where it positively contributes to the character and quality of its environment through good layout and design. It should harmonise with or enhance land use and should relate well to local topography and landscape features.

   Policy NE4 of the Local Plan states that new development will be permitted that positively contributes to landscape character. Proposals must demonstrate that they consider landscape context, including local distinctiveness and enhance key landscape features, ensuring their long term maintenance. Proposals must also identify their likely visual impacts on the local landscape and should conserve, enhance or restore important landscape features. Detrimental impacts on features which make a significant contribution to character, history and setting of an area or asset should be avoided.

   Policy CC2 of the Local Plan relates to renewable energy and low carbon generation, stating that proposals for such technologies (including associated infrastructure) will be supported in principle subject to all of

a number of criteria being demonstrated. One of these is that the proposal has been designed to minimise the impact (including any cumulative impacts) on the natural environment in terms of landscape and visual impact.

The proposed development would introduce an expansive area of new built form into a predominantly agricultural landscape. This would significantly alter the physical and perceptual attributes of the landscape, resulting in a sense of urbanisation and changing its intrinsic character. The established character of the landscape would be further altered by the proposed boundary planting and management scheme, which would introduce tall hedgerows that would be uncharacteristic of the area. The development proposal would be out of keeping with its landscape setting, harming the character of the landscape and having a detrimental impact on the visual qualities of the area. The development is thereby considered to be contrary to the aforementioned policies.
